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State of Oregon

2021-2025

Consolidated Plan

PREPARED FOR:

State of Oregon
Oregon Housing and Community Services
Oregon Health Authority
Business Oregon

SUBMITTED

06/15/2021

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State of Oregon Draft 2021-2025 Consolidated Plan

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2021-2025 Five-year Consolidated Plan & 2021 Annual Action Plan

State of Oregon

Oregon Housing & Community Services

Oregon Health Authority

Business Oregon



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Acknowledgements

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Executive Summary

ES-05 Executive Summary - 91.300(c), 91.320(b)

1. Introduction

Annually, the State of Oregon receives federal block grant funds through the U. S. Department of Housing and Urban Development (HUD) to address housing and community development needs in small cities and rural areas. These funds include the Community Development Block Grant (CDBG), Housing Investment Partnerships Program (HOME), Emergency Solutions Grant (ESG), the national Housing Trust Fund (HTF), and Housing Opportunities for Persons with AIDS (HOPWA) funds. As a condition of these funds, the state is required to develop a five-Year Consolidated Plan that includes housing and community development goals for the five year planning cycle.

The State of Oregon's 2021-2025 Consolidated Plan was developed jointly by Oregon Housing and Community Services (OHCS), Oregon Business Development Department-Infrastructure Finance Authority (OBDD-IFA in this document and also known as Business Oregon), and the Oregon Health Authority (OHA). Root Policy Research served as the consultant for development of the Consolidated Plan.

What is the Consolidated Plan?

A Consolidated Plan is required of any city, county or state that receives federal block grant dollars for housing and community development funding from HUD. The **purpose of the Consolidated Plan** is:

- To identify a city's, county's or state's housing and community development needs, priorities, goals and strategies;
- To identify the housing and service needs of low and moderate income households, persons experiencing homelessness and non-homeless special needs populations; and
- To stipulate how funds will be allocated to housing and community development activities during the five year planning period.

The Consolidated Plan is also a tool for priority-setting and targeted investment planning for housing and community development. It embraces need-driven, place-based decisions, and informed public participation in guiding funding decisions over the next five years.

In Oregon, five block grant programs are covered by this Consolidated Plan. These include:

Community Development Block Grant (CDBG). CDBG is administered by the Oregon Business Development Department, referred to as OBDD-IFA throughout this plan. The primary objective of this program is to develop viable communities by providing decent and affordable housing, a suitable living environment, and economic opportunities, principally for persons of low- and moderate-income. OBDD-IFA assesses the non-housing community development needs in the state through economic development stimulation and addressing major deficiencies in public infrastructure. OBDD-IFA invests in projects within non-entitlement communities that enhances livability, retains and expands job creation, protects our water and sewer systems and builds community facilities for the benefit of the residents, of which the majority are low to moderate income.

The **Housing Investment Partnerships Program (HOME)** program, the **Housing Trust Fund (HTF)** program and the **Emergency Solutions Grant (ESG)** are administered by Oregon Housing and Community Services (OHCS). OHCS' mission is to provide stable and affordable housing, and engage leaders to develop integrated statewide policy to address poverty and provide opportunity for Oregonians. OHCS provides housing development finance tools to developers of affordable rental housing. OHCS also has responsibility for administering housing stabilization resources through community service providers including the Community Action network. OHCS allocates ESG and HOME TBRA to their service partners to address issues of homelessness and options to help renters retain or obtain permanent housing. OHCS uses federal and state resources to provide energy and weatherization assistance via our service partners. OHCS also administers programs which help Oregonians access affordable homeownership and avoid foreclosure; which is a critical strategy in this challenging and ever changing housing market. The HOME and HTF programs are used to fund some of these efforts.

Housing Opportunities for Persons with AIDS (HOPWA). The Oregon Health Authority (OHA) administers the HOPWA program for the non-entitlement areas of the state. The program is designed to assist people living with HIV/AIDS in creating a continuum of stable and sustainable housing. OHA helps people living with HIV/AIDS create a continuum of stable, sustainable housing through the Oregon Housing Opportunities in Partnership (OHOP) program. The OHOP program assists households in establishing and maintaining a stable living environment, thereby reducing the risk of homelessness, and improving access to HIV treatment and other health care and support.

Methodology notes. The Consolidated Plan typically defers to demographic categories and terms used in the U.S. Census. In some cases, persons of different ethnicities are grouped together, such as Asian Americans, Alaska Natives or Pacific Islanders. In other cases, income ranges and household characteristics are broad. This plan utilizes the most current data, disaggregates broad data categories, and uses culturally acceptable terms wherever possible. However, some of the required tables in this plan, which are pre-populated by HUD, retain broader labels.

The term Area Median Income (AMI) is used to explain Comprehensive Housing Affordability Strategy (CHAS) data derived from American Community Survey data. Because Comprehensive Housing Affordability Strategy data are derived from American Community Survey data, Census definitions dictate the definitions of the variables discussed in these tables:

- Small Family Household: A household with two-four members
- Large Family Household: A household with five or more members
- Elderly: Ages 62-74
- Frail Elderly or Extra Elderly: Ages 75+
- Household: All people living in a housing unit. Members of a household can be related or unrelated
- Family: Related individuals living in the same household
- Nonfamily: Unrelated individuals living in the same household

Consolidated Plan data sources include the Comprehensive Housing Affordability Strategy (CHAS) dataset (2011-2015), Census data from both Decennial enumerations (2010) and American Community Survey estimates (2018 1-year and 5-year), the 2019 Point-In-Time count from the Balance of State Continuum of Care, local, regional, and state plans and studies, and contributions from stakeholder consultations and resident engagement.

Other sources include:

- HUD's Multifamily Assisted Living and Section 8 housing inventories;
- The Longitudinal Employer-Household Dynamics database;
- Forecasts from the Portland State University Population Research Center;
- Community needs surveys;
- Reports on the extent and characteristics of residents living in poverty in Clackamas County, Jackson County, Lane County, Multnomah County, and Washington County;
- Data on sub-populations with special needs obtained from Oregon's Department of Human Services, Oregon's Department of Corrections, and the Oregon Health Authority;
- Data on students experiencing homelessness and housing instability from the Oregon Department of Education;
- 2019 Oregon Statewide Shelter Study;
- 2019 Affordable Housing Cost Study;
- Oregon Coalition Against Domestic and Sexual Violence's 2019 Striving to Meet the Need annual report;
- 2020 Independent Consultant Report #6, "Oregon Health Authority Activities to Implement the Oregon Performance Plan"
- "Oregon's Infrastructure Opportunities: Funding, Economic Development, and Resilience", Institute for Policy and Research Engagement, University of Oregon, October 2020;
- The Oregon Community Foundation's 2019 study "Homelessness in Oregon, A Review of Trends, Causes, and Policy Options";
- National Low-Income Housing Coalition's 2019 Out of Reach Study;

- The “2019 Report Card” for Oregon’s Infrastructure by the Oregon Section of the American Society of Civil Engineers;
- 2016 League of Oregon Cities Infrastructure Survey data; and
- The Center for Disease Control’s “Behavioral and Clinical Characteristics of Persons with Diagnosed HIV Infection Medical Monitoring Project 2018 Cycle”.

Note that data on the number of persons experiencing homelessness comes from a count of sheltered and unsheltered people conducted in January of 2019. While the Point-in-Time data does not provide a comprehensive assessment of homelessness in the state, the data does provide a snapshot of the homeless population on a given day.

Participating jurisdictions, also referred to as “entitlement” jurisdictions, receive housing and community development allocations directly from HUD. Jurisdictions are eligible to receive funds if they meet population and need thresholds. These jurisdictions complete separate Consolidated Plans. Conversely, the balance of state is also referred to as “non-entitlement” areas.

Jurisdictions that are not designated as participating jurisdictions (PJ) are considered part of the balance of state (BOS). BOS jurisdictions differ depending on funding source, as some may qualify for a direct allocation of the Community Development Block Grant (CDBG) but not the HOME Investment Partnership Program (HOME); larger communities will qualify for both. Additionally, the term balance of state is used in the following way to designate a specific organization: *Balance of state Continuum of Care*, which is also known as the Rural Oregon Continuum of Care.

2. Summary of the objectives and outcomes identified in the Plan Needs Assessment

This Five-year Consolidated Plan builds upon the Statewide Housing Plan (SWHP) and furthers initiatives implemented during the 2020 program year to respond to the housing and economic needs of Oregon’s residents and communities worsened by the COVID-19 pandemic and wildfires.

Through ESG investments, this plan anticipates providing homeless prevention services to 1,700 persons in Oregon annually. ESG also plans to provide Tenant Based Rental Assistance to 300 households and shelter services to 1,500 persons on an annual basis. The plan proposes street outreach to 6,500 persons through ESG funding on an annual basis as well. HOPWA investments are projected to provide Tenant Based Rental Assistance and supportive services to 60 households annually and 15 households with permanent housing placement services. HOME will support new construction of 60 affordable housing units annually and provide more than 2,000 households with housing assistance and homeless prevention. CDBG and the HTF will support housing condition improvements for more than 150 affordable units.

CDBG will stabilize and revitalize rural communities through investments in public facilities, public infrastructure, and microenterprise business assistance.

3. Evaluation of past performance

Each year Oregon submits to HUD a Consolidated Annual Performance and Evaluation Report (CAPER) and a Performance Evaluation Report (PER). Together these reports summarize the accomplishments achieved with HUD's five grant programs. These documents may be accessed at the following link <https://www.oregon.gov/ohcs/development/Pages/consolidated-plan.aspx>

Completion of the CAPER allows the state to consider policies and projects that have been successful in past program years, and where changes need to be made to best address needs. The evaluation of past performance captured in the CAPERs, as well as the collection of new needs data and stakeholder feedback on desired outcomes from block grant investments, helped inform the 2021-2025 Consolidated Plan goals, priorities, and projects.

As of the filing of the 2019 CAPER, which covers four program years from the last five-year Consolidated Plan, the state had accomplished the following:

- **CDBG**—Exceeded its goal for housing rehabilitation (327 homes); public works projects (18 projects); SL1 community facilities (food banks, family resource centers, community centers, senior centers, fire stations or libraries 8 projects); and community capacity technical assistance. The number of SL3 projects (rehabilitation or construction of drug and alcohol treatment centers, head start facilities, mental health and health clinics, and sheltered workshops for person with disabilities) were lower than expected, with just 1 project compared to the 3 expected. Five-year goals for microenterprise assistance have been lower than expected, with 190 projects compared to 500 expected. Economic development projects have historically been challenging to accomplish and were not a priority area in the last five-year plan due to lack of demand. This has changed with the COVID-19 pandemic, and Oregon has allocated supplemental CDBG dollars received through the CARES Act (CDBG-CV) to enhanced small business assistance and microenterprise projects.
- **HOME and HTF**—Exceeded goals for number of rental units rehabilitated (223 units); tenant based rental assistance (TBRA, 3,292 households). Slightly under goals for rental units constructed (228—76% of goal). A significant need remains for affordable rental units and the less-than-expected number of rental units constructed should not be interpreted as a sign of declining need; instead, this is a reflection of rising construction

costs and increased competition for public subsidies which can complicate applications and completion of projects.

- **ESG**—Exceeded goals for TBRA (4,083 households); on-track to accomplish homeless prevention goals; and slightly under homeless shelter assistance goals (7,371).
- **HOPWA**—Slightly under goals for supportive housing provision by assisting 163 households compared to the 193 expected and strongly exceeded goals for relocation services and temporary lodging by assisting 36 households compared to the 28 expected.

The state’s performance in accomplishing past goals has been very strong, and project areas of focus remain consistent with the current needs identified in this new five-year plan. Tenant based rental assistance, in particular, has demonstrated strong demand, as has the ongoing need for rental units (including those newly developed) which meet fair market rent standards, and community facilities. The unusual events during 2020—the COVID-19 pandemic and historical wildfire activity—tilt current needs and priorities toward housing stability efforts, as well as community health care projects and access to telehealth services.

4. Summary of citizen participation process and consultation process

OBDD-IFA, OHCS, and the Root team are grateful to the residents and stakeholders who shared their experiences and perspectives on the most pressing housing, community development, economic development, and fair housing needs across Oregon. The community engagement process included:

- A stakeholder survey focused on economic and community development fielded with local and regional economic and community development experts, local elected officials, and city and county staff (OBDD-IFA Community Development Stakeholder Survey, 76 respondents);
- A stakeholder survey focused on housing needs, special needs populations, and fair housing with a diverse range of local experts in housing, human services, advocacy and more (OHCS Housing Stakeholder Survey, 109 respondents);
- Six regional roundtable discussions (conducted by zoom) with representatives of rural Oregon community and economic development organizations and human service agencies (26 participants);
- Six focus groups with residents most likely to experience housing discrimination and economic insecurity; and
- In-depth interviews with state and local experts on topics ranging from emergency management and disaster recovery to broadband access to advocacy and service provision to the state’s immigrant communities.

- In addition, OBDD-IFA hosted a statewide conference

5. Summary of public comments

Public comments were received by three organizations. Two comments were specific to the HOME program and one comment was specific to the Analysis of Impediments. To see the public comments in their entirety please see Attachment C of this document. A summary of these comments are as follows:

Housing Oregon – Commented on the American Rescue Plan Act funding that has been earmarked for the HOME program. The commentor asked that these funds be used to support existing projects facing financial hurdles as opposed to using the dollars for new projects.

Habitat for Humanity of Oregon – Commented that they would like to see HOME funds utilized for homeownership purposes including but not limited to land acquisition, new construction, down payment assistance and repair/rehabilitation.

Housing Land Advocates – Commented that they would like to see additional action items added to the Analysis of impediments to include establishing a state Affirmatively Furthering Fair Housing policy, long term integration of the Regional Housing Needs Analysis (HB-2003), expansion of the local governing bodies who must comply with the Housing Production Strategies tied to HB-2003, a more robust Post-Acknowledgement Plan Amendment process at the state level, periodic review of state land use regulations and added protections to the development of state farmworker housing.

6. Summary of comments or views not accepted and the reasons for not accepting them

Housing Oregon – the public comments from Housing Oregon were specific to HOME funds that are to be received through the American Rescue Plan Act (ARPA). ARPA resources are currently not integrated into the 2021-2025 Consolidated Plan but are scheduled to be addressed through an amendment process, likely in the fall. OHCS will retain this public comment and respond to it at that time.

Habitat for Humanity of Oregon – Homeownership is a priority of OHCS and our Consolidated Plan partners as stated in the Oregon Statewide Housing Plan. OHCS will continue to look at all state and federal resources to determine how best to prioritize available funding. OHCS and other Consolidated Plan partners have prioritized resources other than federal HOME dollars to support households in accessing and maintaining the benefits of homeownership. CDBG resources administered by Business Oregon are used for homeowner rehab and state general

fund resources support down payment and foreclosure prevention assistance given the more flexible nature of those resources.

Housing Land Advocates – Recommendation made by Housing Land Advocates were largely integrated into the Consolidated Plan through the Analysis of Impediments. Some modifications to the recommendations were made primarily as a need for additional work such as research, stakeholder engagement or legislative directives still need to occur. However, by and large these recommendations were incorporated.

7. Summary

This document is the Five-year Consolidated Plan for the State of Oregon. It sets priorities and goals for investment of HUD block grant funds over a five year period. Annually, the state will propose how to allocate these funds using the five-year plan as guidance.

The Process

PR-05 Lead & Responsible Agencies 24 CFR 91.300(b)

1. Describe agency/entity responsible for preparing the Consolidated Plan and those responsible for administration of each grant program and funding source

The following are the agencies/entities responsible for preparing the Consolidated Plan and those responsible for administration of each grant program and funding source.

Agency Role	Name	Department/Agency
Lead Agencies	OREGON	Oregon Business Development Department and Oregon Housing and Community Services
CDBG Administrator	OREGON	Oregon Business Development Department
HOPWA Administrator	OREGON	Oregon Health Authority
HOME Administrator	OREGON	Oregon Housing and Community Services
ESG Administrator	OREGON	Oregon Housing and Community Services
HTF Administrator	OREGON	Oregon Housing and Community Services

Responsible Agencies

Narrative

The State of Oregon’s 2021-2025 Consolidated Plan was developed jointly by Oregon Business Development Department-Infrastructure Finance Authority (OBDD-IFA), Oregon Health Authority (OHA), and Oregon Housing and Community Services (OHCS). Concurrently, the partners prepared an Analysis of Impediments to Fair Housing Choice (AI) for the state. Stakeholder consultation and citizen participation included stakeholder surveys, roundtable discussions, in-depth interviews, and focus groups with residents.

The analysis in this document is conducted for three distinct geographic levels as data allow—the state overall, non-entitlement areas only, and by region. The regional analyses align with Oregon’s Office of Economic Analysis (OEA) regions:

- Central Oregon—Crook, Deschutes, and Jefferson counties;
- Columbia Gorge—Gilliam, Hood River, Sherman, Wasco, and Wheeler counties;
- North Coast—Clatsop, Lincoln, and Tillamook counties;
- Northeast Oregon—Baker, Grant, Morrow, Umatilla, Union, and Wallowa counties;
- Portland MSA—Clackamas, Columbia, Multnomah, Washington, and Yamhill counties;

- South Central/Southeast Oregon—Harney, Klamath, Lake, and Malheur counties;
- South Coast—Coos and Curry counties;
- Southern Oregon—Douglas, Jackson, and Josephine counties; and
- Willamette Valley—Benton, Lane, Linn, Marion, and Polk counties.

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PR-10 Consultation – 91.100, 91.110, 91.200(b), 91.300(b), 91.200(I) and 91.315(I)

1. Introduction

The state of Oregon, through Oregon Housing and Community Services (OHCS), Oregon Business Development Department-Infrastructure Finance Authority (OBDD-IFA), and Oregon Health Authority (OHA), consulted with other agencies, and housing and human service providers, economic and community development stakeholders, and residents across the state to identify the greatest housing and community development needs and prioritize activities to address unmet needs.

Concurrent with the Consolidated Plan development, the state prepared a 2021 Analysis of Impediments to Fair Housing Choice.

Provide a concise summary of the state’s activities to enhance coordination between public and assisted housing providers and private and governmental health, mental health and service agencies (91.215(I))

In the development of this Consolidated Plan, community engagement included a statewide survey of stakeholders with expertise in affordable housing provision and development, services for persons experiencing homelessness including representatives of Continuum’s of Care (CoC), human services, and mental and behavioral health care. Participants identified housing, supportive service, and community development needs. Findings from this consultation are incorporated throughout the Consolidated Plan, including shaping the strategic plan and goals for both state and federal funds.

The Oregon Health Authority (OHA) was a partner in development of this Plan. OHA assisted in and reviewed the estimates of homes with lead based paint hazards, especially for low income children occupying older homes.

Local health departments participated in identifying housing and community development needs through their involvement in the stakeholder survey; 15% of respondents were from the health care field.

Oregon’s strong state funding support for meeting the housing, human service, and mental health needs of its residents allow both state and federal funds to be leveraged for the greatest impact on meeting the identified needs. The OBDD-IFA, OHCS, and OHA staff work closely with local stakeholders to build capacity and advance projects to benefit low and moderate income residents, those experiencing homelessness, and those who are members of special need populations.

Describe coordination with the Continuum of Care and efforts to address the needs of homeless persons (particularly chronically homeless individuals and families, families with children, veterans, and unaccompanied youth) and persons at risk of homelessness

Oregon is served by a Homeless Services team within OHCS who support a network of community action agencies (CAAs) across the state. CAAs are members of a Continuum of Care (CoC). Each CoC is regionally unique and one, the Rural Oregon CoC, represents 75 percent of the state- geographically. The connection with regional CoCs is strong, as many overlap with Community Action Agencies (CAAs) who by statute are direct OHCS grantees.

In addition to the consultation for this Consolidated Plan, Homeless Services recently completed in-depth consultation with seven of the state's eight CoCs to inform the state's strategy for administering ESG funds. In this process, OHCS gained a rich understanding of how local shelter and homeless service provision has been impacted by COVID. The CoC consultations included discussion of the disproportionate impact of COVID on persons of color in Oregon and the need to increase outreach to agencies led by or serving people of color. Just as COVID disproportionately impacts communities of color, so does homelessness. As discussed in the 2021 Analysis of Impediments, in Oregon, White residents, Black or African American residents, and Native American residents are slightly overrepresented among homeless individuals, even after adjusting for poverty. Although, the Hispanic community is less likely to be street homeless or living in shelters, it is more likely to be doubled-up and living in multigenerational households.

OHCS is the statewide lead for HMIS and has set aside funds to help more organizations, particularly those led by or serving people of color to build the capacity to operate HUD programs and ensure that Oregon's residents experiencing homelessness or high risk of homelessness are served by culturally specific and culturally responsive organizations. There is a real need to broaden and strengthen culturally specific partnerships; while these agencies exist, they typically do not have any history of doing homelessness programming. These agencies need investment, partnership, and collaboration to successfully administer ESG and other HUD programs.

Homelessness and increased risk of homelessness is tied to many factors that cross multiple state agencies. In order to holistically assess needs and the extent to which Oregon's systems are meeting needs, OHCS is investing in a data repository to bring together and tie HMIS and other homeless data to health authority data, data from the Department of Human Services (DHS), K-12 education, and more. As a result, OHCS will be better positioned to ensure that strategies and projects are data-driven and that state and federal resources are being deployed to maximum effect.

Describe consultation with the Continuum(s) of Care that serves the state in determining how to allocate ESG funds, develop performance standards and evaluate outcomes, and develop funding, policies and procedures for the administration of HMIS

Oregon's CAA network are the state mandated homeless grantees, and network agency staff have leadership roles on their local or regional CoC. Each CoC regionally is unique, but there are opportunities for more collaboration and expansion in their system. Many of Oregon's CoCs operate as HUD intends, at a high level and with strong coordination across the region. Others need support to build regional capacity. For example, some CoCs excel at using HMIS and other program data to direct decision-making, while others are less successful at using data to drive program operations.

As mentioned above, Homeless Services consulted with the CoCs to inform the ESG strategy. One of the key findings from the consultation process is the significant need for Permanently Supportive Housing (PSH). OHCS's PSH Institute, funded by state general funds, is in its second year of operation. OHCS intends to direct state funds to homeless prevention efforts and prioritize ESG allocations on shelter and PSH. OHCS received a significant amount of funding from the state legislature which the CAAs overwhelmingly focused on homelessness prevention activities to help households affected by the COVID-19 pandemic keep their existing housing. As a result, OHCS directed the CAAs to spend 80% of their federal funds for services to the homeless, including shelter and rapid re-housing rental assistance.

2. Describe Agencies, groups, organizations and others who participated in the process and describe the jurisdictions consultations with housing, social service agencies and other entities.

Consultation with stakeholders included two surveys, six regional roundtable discussions, and focus groups with residents as described in PR-05.

Participants in the OBDD-IFA survey described their primary role in their community as:

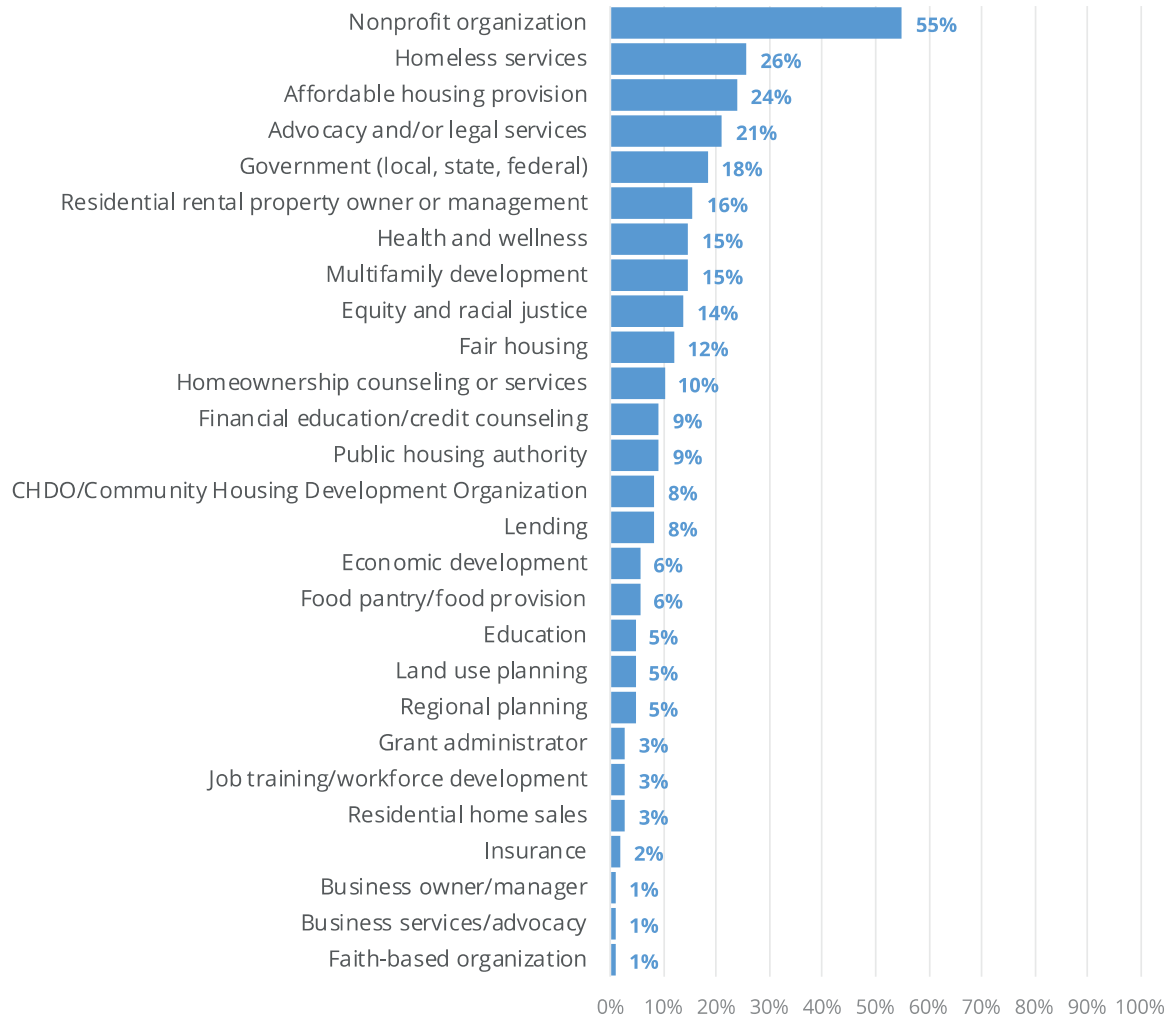
- Economic development (45%);
- Community development (29%);
- Grant administrator (22%);
- Public works (17%);
- Land use planning (12%); and
- City administration or City Manager (11%).

The balance identified roles ranging from finance to regional planning to transportation planning and being an elected official.

More than half of OHCS stakeholder survey participants work for nonprofit organizations. As shown in the figure below, the industry or organization type of these respondents is diverse and includes homeless services (26%), affordable housing (24%), advocacy and legal services (21%), government (18%), and rental property owners and managers (16%).

Participants in the regional stakeholder roundtables included staff with regional economic development organizations, childcare providers, and housing providers.

Agencies, groups, organizations who participated



Note: n=109.

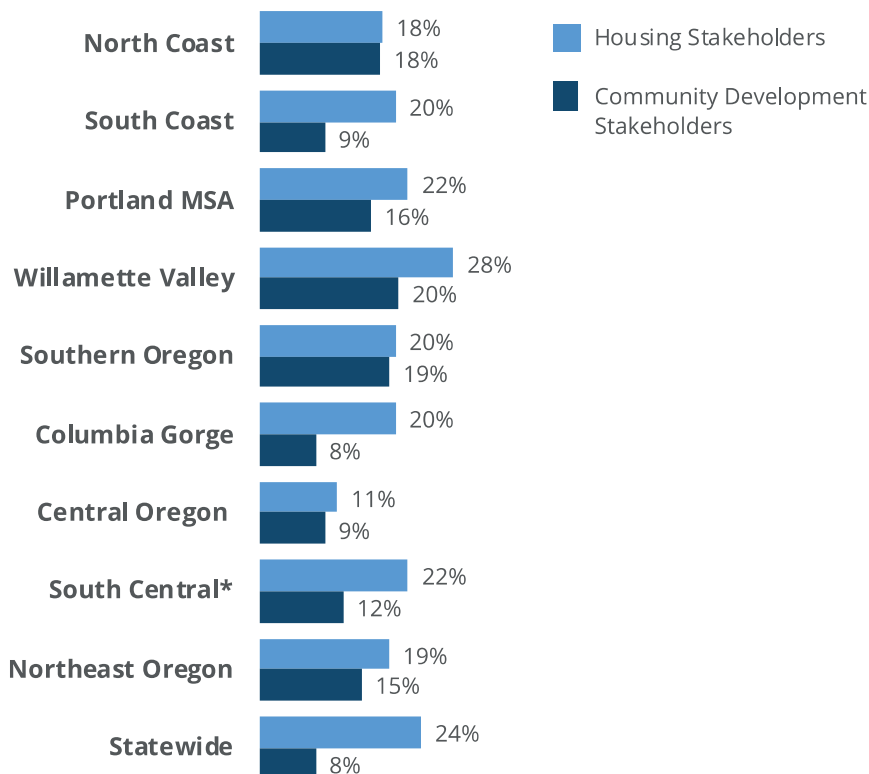
Source: Root Policy Research from the 2020 OHCS Housing Stakeholder Survey.

The figure below shows the regions of Oregon served by participants in the Housing and Community Development stakeholder surveys. Each region of the state is represented as well as organizations with statewide operations.

Region(s) Served

Note:
 Numbers add to greater than 100 percent due to multiple response. n=106 housing stakeholders and n=74 community development stakeholders.

Source:
 Root Policy Research from the 2020 OHCS Housing Stakeholder Survey and the 2020 Business Oregon Community Development Stakeholder Survey.



See the Community Participation Appendix for a detailed summary of the community engagement process and findings from engagement.

Identify any Agency Types not consulted and provide rationale for not consulting.

The state developed a broad approach to consultation for the consolidated plan. To that end, there were no agencies that were not provided an opportunity to actively be engaged, or be consulted with, in the development of this plan.

Other local/regional/state/federal planning efforts considered when preparing the Plan

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
2021 State of Oregon Analysis of Impediments to Fair Housing Choice	OBDD-IFA	This Strategic Plan will mitigate housing disparities and further housing choice by addressing housing condition challenges; reduce and divert people from homelessness; create affordable housing; and promote fair housing activities. As discussed in this plan and in the AI, BIPOC residents and residents with disabilities have disproportionately higher rates of housing needs
“Breaking New Ground” Oregon’s Statewide Housing Plan for 2019-2023	OHCS	This Strategic Plan helps implement the goals of the SWHP by providing funding to address priority housing needs and reduce disparities in housing choice, furthering equity
2019 Report Card for Oregon’s Infrastructure	Oregon Section of the American Society of Civil Engineers	The Public Works goals within this Strategic Plan address challenges of public infrastructure in rural communities
Oregon’s Workforce and Talent Development Strategic Plan	Oregon Workforce and Talent Development Board	The Strategic Plan will assist small and emerging business owners build skills and employment capacity
Statewide Land Use Planning Goals	Department of Land Conservation and Development	This Strategic Plan will support Goal 10: Housing calls for Oregon cities to plan for and accommodate needed housing types by leveraging HUD block grant funds to create new affordable housing

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
2021 State of Oregon Analysis of Impediments to Fair Housing Choice	OBDD-IFA	This Strategic Plan will mitigate housing disparities and further housing choice by addressing housing condition challenges; reduce and divert people from homelessness; create affordable housing; and promote fair housing activities. As discussed in this plan and in the AI, BIPOC residents and residents with disabilities have disproportionately higher rates of housing needs
“Breaking New Ground” Oregon’s Statewide Housing Plan for 2019-2023	OHCS	This Strategic Plan helps implement the goals of the SWHP by providing funding to address priority housing needs and reduce disparities in housing choice, furthering equity
2019 Report Card for Oregon’s Infrastructure	Oregon Section of the American Society of Civil Engineers	The Public Works goals within this Strategic Plan address challenges of public infrastructure in rural communities
Oregon’s Workforce and Talent Development Strategic Plan	Oregon Workforce and Talent Development Board	The Strategic Plan will assist small and emerging business owners build skills and employment capacity
Prosperity for All Oregonians	OBDD-IFA Strategic Plan 2018-2022	This Strategic Plan will support: 1) Building local economic development capacity in rural communities; 2) Aligning infrastructure investments to support long-term growth; and 3) Addressing barriers to opportunity for BIPOC residents

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
2021 State of Oregon Analysis of Impediments to Fair Housing Choice	OBDD-IFA	This Strategic Plan will mitigate housing disparities and further housing choice by addressing housing condition challenges; reduce and divert people from homelessness; create affordable housing; and promote fair housing activities. As discussed in this plan and in the AI, BIPOC residents and residents with disabilities have disproportionately higher rates of housing needs
“Breaking New Ground” Oregon’s Statewide Housing Plan for 2019-2023	OHCS	This Strategic Plan helps implement the goals of the SWHP by providing funding to address priority housing needs and reduce disparities in housing choice, furthering equity
2019 Report Card for Oregon’s Infrastructure	Oregon Section of the American Society of Civil Engineers	The Public Works goals within this Strategic Plan address challenges of public infrastructure in rural communities
Oregon’s Workforce and Talent Development Strategic Plan	Oregon Workforce and Talent Development Board	The Strategic Plan will assist small and emerging business owners build skills and employment capacity
Continuum of Cares	OHCS	Strategic Goals for HOME, ESG, and HOPWA will help reduce and divert homelessness and facilitate deeply affordable rental units
Oregon 2020-2023 WIOA Combined State Plan	OBDD-IFA, Governor’s Office	The Strategic Plan will assist small and emerging business owners build skills and employment capacity

Other local / regional / federal planning efforts

Describe cooperation and coordination among the State and any units of general local government, in the implementation of the Consolidated Plan (91.315(I))

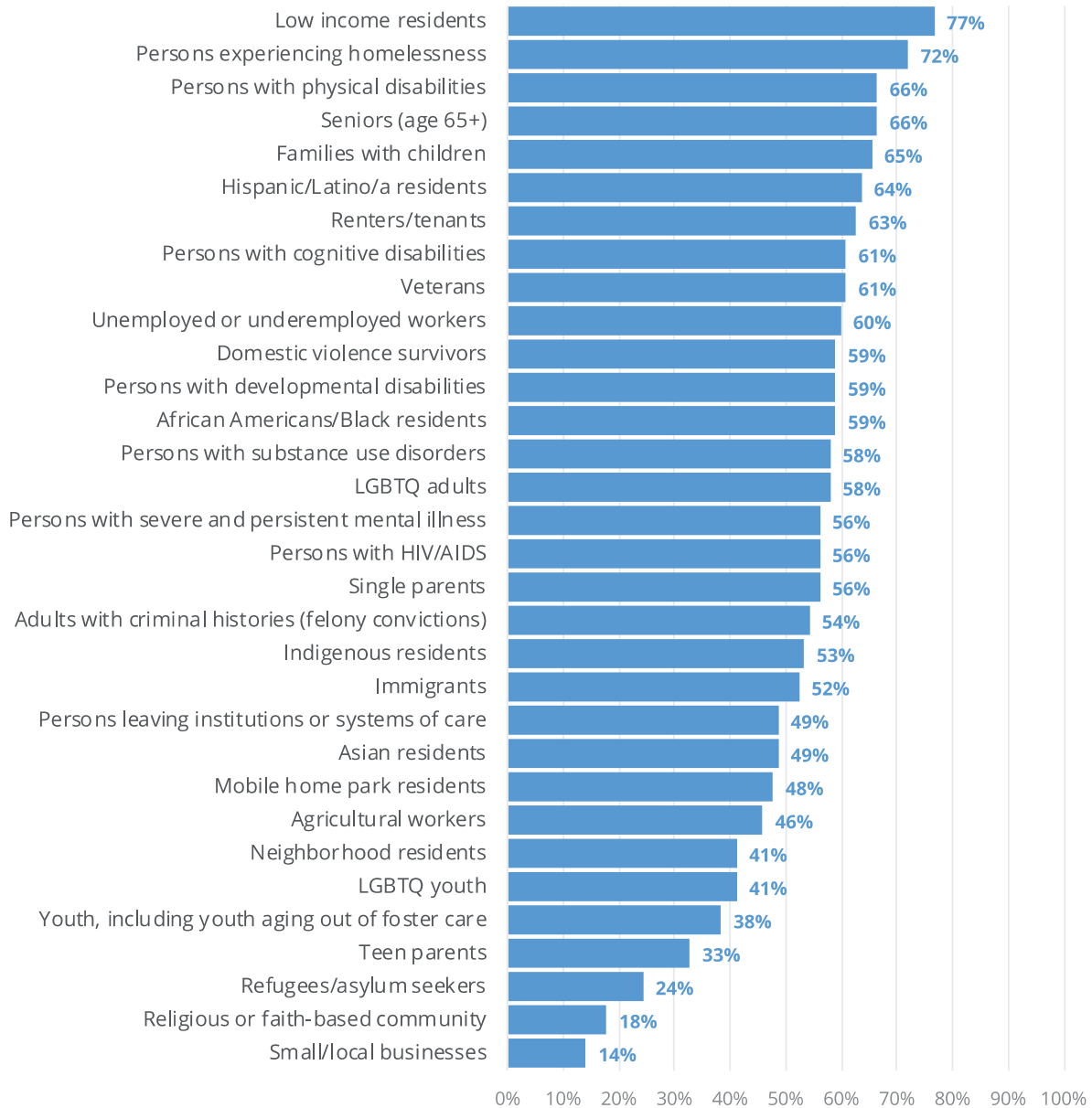
Through citizen participation and consultation, OBDD-IFA, OHA, and OHCS sought input from local government throughout Oregon’s non-entitlement areas. Local government staff and staff from regional economic development organizations, councils of local governments, and professional associations representing cities and counties participated in stakeholder surveys and roundtable discussions to both identify the greatest unmet housing and community development needs in their area and to prioritize the housing activities, services, and economic development initiatives to best meet those needs. In addition to representatives of local government, stakeholders representing a broad range of housing and human service providers, civil rights and fair housing organizations, and other community leaders participated in the OBDD-IFA, OHA, and OHCS stakeholder surveys and roundtables. A detailed summary of the community engagement process and key findings can be found in the Community Participation Appendix.

PR-15 Citizen Participation – 91.105, 91.115, 91.200(c) and 91.300(c)

**1. Summary of citizen participation process/Efforts made to broaden citizen participation
Summarize citizen participation process and how it impacted goal-setting**

As described in PR-05, citizen participation included stakeholders and residents from across the state. Conducted in late summer and fall 2020 during the COVID pandemic, all of the engagement was conducted online, either by survey or zoom/Microsoft Teams meetings. More than 2,300 stakeholders received the invitation to participate in the OHCS survey and 581 in the OBDD-IFA survey. As described in PR-10, stakeholders who responded to the surveys represent each region of Oregon, a host of professions and areas of expertise, and serve or advocate for Oregon’s low and moderate income residents, special needs populations, persons experiencing homelessness, people of color, immigrants and refugees, and the small business community.

Populations Served



Note: n=109.

Source: Root Policy Research from the 2020 OHCS Housing Stakeholder Survey.

Partnering with the League of Oregon Cities and Counties, OBDD-IFA invited economic development, housing, and human service providers to participate in regionally-designated roundtable discussions. These roundtable discussions provided an opportunity for community members to share the unique qualities of their region that impact housing and community development.

COVID impacts on engagement. The shift from in-person meetings to online had the greatest impact on the resident focus groups. Originally planned for in-person focus groups hosted by trusted organizations, the shift to online focus groups made recruiting participants much more difficult. In normal times, host organizations—typically smaller nonprofit organizations operating with limited resources—can host a focus group with little staff time spent recruiting, as staff often interact with potential participants in-person daily. For the resident focus groups, every effort was made to partner with local organizations to facilitate online focus groups with historically marginalized populations, particularly farmworkers and immigrants in rural Oregon. During the COVID pandemic, many organizations contacted did not have the capacity to host, as every spare moment needed to be spent helping clients through the crisis. Those organizations who had capacity quickly learned that residents, especially those who are undocumented, were not comfortable participating in an online discussion out of concerns for their privacy.

The digital divide—particularly access to high speed Internet and devices—was also a factor in both resident *and* stakeholder focus groups, where not all participants had sufficient bandwidth to participate by video and were thus limited to audio. Digital literacy is also a factor; it was not uncommon for participants to say “no” because they did not have experience with zoom.

Engagement impact on goal setting. Findings from the community engagement are woven throughout the Needs Assessment (NA) and Housing Market Assessment (MA) sections of this Consolidated Plan. Together these analyses informed prioritization of housing and community development needs and development of the Strategic Plan (SP) and Annual Goals and Objectives (AP). In addition to influencing goal setting for this Consolidated Plan, the lead agencies will integrate key findings into other plans and daily operations as they work to serve the people of Oregon.

Citizen Participation Outreach

Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
OBDD-IFA Infrastructure Roundtables	Representatives of local government, and community and economic development organizations in Oregon’s small rural communities.	A total of six roundtable discussions grouped by region, with 26 participants.	Participants discussed local housing, economic and community development needs, challenges experienced by non-homeless special needs populations, and capacity of local government and agencies to respond to these community development and economic needs.	All comments accepted.	

Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (if applicable)
OBDD-IFA Infrastructure Summit, “The Oregon Summit”	Local governments and governmental agencies or organizations charged with maintaining public infrastructure in Oregon	400 registrants participated, including representatives from more than 80 Oregon local governments, 10 states, and Canadian province.		All comments accepted.	https://theoregonsummit.com/about/

Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
OHCS Stakeholder Survey	Local experts in housing, human services, education, civil rights, tenant rights, housing advocacy	109 respondents representing non-entitlement areas in all regions of Oregon	Participants identified and prioritized the housing activities needed to address urgent housing needs, urgent needs of residents experiencing homelessness, and assessed potential barriers to fair housing choice and access to opportunity. See Appendix A for a detailed summary of responses.	All comments accepted.	

Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (if applicable)
OBDD-IFA Stakeholder Survey	Economic and community development fielded with local and regional economic and community development experts, local elected officials, and city and county staff	76 respondents representing non-entitlement areas in all regions of Oregon	Participants identified the greatest community and economic development needs in their region and prioritized those needs. See Appendix A for a detailed summary of responses.	All comments accepted.	

Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
Resident Focus Groups	Residents vulnerable to housing discrimination and at-risk of housing instability, including persons with disabilities, extremely low and very low income households, people of color, including immigrants	Six focus groups were conducted via Zoom and/or conference call.	Participants identified the greatest housing and community and economic development needs in their region and prioritized those needs. See Appendix A for a detailed summary of responses.	All comments accepted.	

Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
Advisory Board Consultations	Meetings, interviews	OBDD-IFA CDBG AAD Committee members, three guests from the general public.	Discussion of housing and community development priorities identified in the roundtables and surveys; discussion of capacity issues and opportunities to increase local capacity.	All comments accepted	
Public Comment	General Public and Stakeholders	3 public comments / no attendance at 2 public hearings	2 comments received regarding HOME funds and 1 comment regarding the AI. See Attachment C.	See Attachment C	

Citizen Participation Outreach

Needs Assessment

NA-05 Overview

The Housing Needs Assessment describes the housing needs of all Oregonians, with a focus on low-income households, special needs populations, and persons experiencing homelessness. Some elements of this section also address non-housing community development needs in the state.

This section primarily relies on data provided by HUD through the Comprehensive Housing Affordability Strategy (CHAS) dataset, Census Data (the American Community Survey, or ACS), data and plans from Continuums of Care, and data forecasts of special needs populations prepared for this Consolidated Plan. While CHAS data is somewhat dated, it is useful in identifying specific populations that have particular housing challenges.

The goal of this section is to provide a clear picture of the demand for housing and related supportive services of special needs populations in Oregon.

Top needs include:

- According to CHAS data, and consistent with the findings in the Statewide Housing Plan (SWHP), the most common housing problem in Oregon is cost burden. Nearly 390,000 households pay more than 30 percent of their incomes in housing costs, up by 7 percent since the last five-year Consolidated Plan. Renters are more likely to be cost burdened.

The SWHP found that 27 percent of Oregon renters households are severely cost burdened. This proportion increased significantly from 2000 (19%) and disproportionate falls on persons of color in the state: more than 50 percent of households with persons of color are cost burdened compared to 34 percent of White households.

- As may be expected, cost burden largely affects those with lower incomes—especially extremely low and very low income renters, who have cost burden rates of 70 and 76 percent, respectively.

By income range and special need, the estimated needs of Oregon households include the following:

- Extremely low income families—those earning incomes below the poverty level—total nearly 182,000 households in Oregon. Those with housing needs will grow by 10,000 over the next five years.
- Low income families—those earning incomes between the poverty level and the median income—total 261,000 in Oregon. Their needs will grow by much less (8,300 additional households) over the next five years.
- Elderly households (62+) total nearly 905,381 and live in 526,675 households. Of these households, 23 percent have housing needs. Those with housing needs are expected to grow by 7,000 households by 2025. Many of these needs will take the form of home accessibility modifications, home repairs, and home health care, as seniors make up a large share of residents who live alone and who have disabilities. Frail elderly (defined as an elderly person who requires assistance with three or more activities of daily living) total 61,518 residents.
- Oregon residents with disabilities total 581,000 and occupy 428,000 households. By 2025, these households with needs will grow by nearly 12,000.
- More than 300,000 persons in Oregon struggled with substance abuse challenges before the COVID-19 pandemic occurred, and these needs have grown during the pandemic. Oregonians who have ever had mental health challenges total 757,000 with 172,000 having serious mental health challenges.
- Approximately 178,000 residents 18 and older in Oregon have experienced some type of domestic violence, dating violence, sexual assault and/or stalking by an intimate partner in the previous year. In the most severe cases, these victims must leave their homes—an estimated 4,200 residents who are victims of domestic violence in Oregon require housing services each year.
- Nearly 16,000 people were identified as experiencing homelessness in Oregon in 2019, an increase of 13 percent since 2017. Two in three are unsheltered.
- Nearly 17,000 households live in substandard housing, based on Census surveys of housing units lacking complete plumbing or kitchen facilities. The number of households in substandard housing decreased by 4 percent compared to the 2021-2025 plan.
- Approximately 29,000 households live in units that are either overcrowded or severely overcrowded. The number of households in overcrowded conditions increased by 19 percent since the last plan.

Stakeholders identified and prioritized housing and community development needs in Oregon’s non-entitlement areas through online surveys and participation in regional roundtable discussions.

Stakeholder perspective—housing needs. Stakeholders’ assessment of the housing activities most needed to address urgent housing needs in their service area align with the findings from the analyses of cost burden and overcrowding. The figure below shows the number of respondents who selected each of 24 housing activities to meet urgent housing needs in their service area. As demonstrated in the figure, the activities selected by the greatest number of respondents to address urgent housing needs are:

- Housing activities that result in more rental units for extremely low income households (<30% Area Median Income or AMI), very low income households (<60% AMI for survey purposes to align with Low Income Housing Tax Credit levels), and low to moderate income households (<80% AMI);
- Emergency shelters for people who are homeless and transitional housing for people moving out of homelessness;
- Repurposing vacant buildings for affordable housing; and
- Affordable and accessible housing for people with disabilities.

Among the following housing activities, where should housing funds be directed to meet urgent needs in your service area? (Select up to 5.)

Housing Activity	# of Responses
More rental units for extremely low income/poverty-level households (at 30% AMI)	61
More rental housing for very low income households (60% AMI or less)	61
Emergency shelters for people who are homeless	49
Transitional housing for people moving out of homelessness	46
More rental housing for low to moderate income households (80% AMI or less)	42
Repurpose vacant/underutilized properties into affordable housing	41
Affordable and accessible housing units for people with disabilities	40
Long-term tenant based rental assistance (6+ months)	38
Funds to pay rental debts accumulated from March 2020 to present (COVID-related)	28
More homes for low to moderate income households to buy (60%-120% AMI)	28
Services that help residents achieve or maintain housing stability (supportive services)	26
Navigators to help residents locate and qualify for affordable housing/housing assistance	24
Emergency assistance to pay utilities	18
Short-term tenant based rental assistance (3-6 months)	15
Preservation of affordable homeownership in manufactured home communities	15
Funds to pay mortgage debts accumulated from March 2020 to present (COVID-related)	14
Assistance to low income homeowners for accessibility modifications (ramps, grab bars)	14
Emergency assistance for vehicle repairs	11
Assistance for health and safety repairs for low and moderate income homeowners	11
Assistance to low income renters for accessibility modifications (ramps, grab bars)	10
Search engine/database to locate and qualify for affordable housing/housing assistance	10
Assistance for health and safety repairs for low and moderate income renters	6
Housing for area workforce	6
Lead-based paint abatement and control	2

Note: n=99.

Source: Root Policy Research from the 2020 OHCS Housing Stakeholder Survey.

Disproportionate housing needs of persons of color. Overall, the vast majority of Oregon residents self-report their race as White (84%) and this share is unchanged from 2010. Hispanic residents comprise the largest racial or ethnic group, representing 13 percent of the total population or more than 500,000 residents—a very slight increase from 12 percent in 2010. Asian residents represent 5 percent of Oregon’s population, nearly the same proportion as

residents reporting Two or more races. Black or African American residents represent 2 percent of the state population.

- The counties with the highest share of people of color overall include Morrow (40%), Jefferson (40%), Malheur (39%), Hood River (36%), and Marion (34%).
- The counties with the largest Hispanic resident population are Morrow (35.9%), Malheur (33.4%), Hood River (31.5%), Umatilla (26.4%), and Marion (26.3%).
- The counties with the highest proportion of Black or African American residents are Multnomah (5.3%), Washington (1.9%), Marion (1.2%), Polk (1.0%), and Malheur (1.0%).
- The counties with the highest proportion of Asian residents are Washington (10.1%), Multnomah (7.2%), Benton (7.1%), Clackamas (4.1%), and Lane (2.6%).
- The counties with the highest proportion of Native American residents include Jefferson (16%), Gilliam (4.3%), Klamath (3.6%), Wasco (3.4%), Lincoln (2.6%).

According to HUD, disproportionate need occurs when a household category has a level of need that is at least 10 percentage points higher than the level of need of all households in a particular income category.

- Among extremely low income households, 150,422 or 88 percent have housing needs (experiencing one or more of the four housing problems). No disproportionate housing needs by race or ethnicity are evident in the CHAS data. This is a shift from the prior Consolidated Plan which found that extremely low income Pacific Islanders had disproportionate housing needs.
- Among very low income households, 647 or nearly all (99%) Pacific Islanders experience housing problems, 21 percentage points higher than other very low income households. A disproportionate need that was not found in the prior Consolidated Plan.
- Among low income households, 141,739 or 54 percent experience housing problems. A total of 2,578 or 65 percent of low income Black or African American households experience housing problems—higher by 11 percentage points. A total of 414, or 64 percent, of low income Pacific Islander households experience severe housing problems, at a rate 19 percentage points higher than other low income households.
- Among moderate income households, 54,471 or 35 percent have housing problems. Nearly half (48%), or 183, moderate income Pacific Islanders experience housing problems, 13 percentage points higher than other moderate income households. Similarly, 83, or 22 percent, of Pacific Islander households experience severe housing problems, 12 percentage points higher than other moderate income households.

- Overall, 256,381, or 17 percent, of Oregon households are severely cost burdened. A total of 7,899, or 34 percent, of Black or African American households are severely cost burdened, 17 percentage points higher than other Oregon households.

It is important to note that the small number of certain populations in Oregon can lead to large margins of error around estimates. As such, disproportionate needs data signal when there is a likely disparity among resident groups; however, they should not be interpreted as actual, known, numbers.

Stakeholder perspective—disproportionate housing needs. Relative to all low and moderate income populations, persons with criminal histories, persons with serious and persistent mental illness (SMPI), those who are currently precariously housed, persons with substance use disorders are considered to have disproportionate housing needs by at least half of stakeholder survey respondents. Two in five stakeholders identify residents with a prior eviction, persons with cognitive disabilities, persons with physical disabilities, residents of Hispanic descent, immigrants lacking documentation, and seniors as having disproportionately high housing needs—defined in the survey as having needs that were much higher than would be expected given those groups’ share of the overall population and relative to all residents.

Homelessness in Oregon. The 2019 Point-in-Time Count revealed nearly 16,000 people were homeless in Oregon, an increase of 13 percent since 2017 when there were nearly 14,000 people living in homelessness.

The unsheltered population grew by 27 percent over the same period from nearly 8,000 unsheltered to 10,142 (64% of all homeless). The sheltered population decreased by 5 percent to 5,734 (36% of all homeless).

While adults living alone represented a majority (74%) of all individuals living in homelessness (11,694 individuals), there were over 3,500 families with children (22%) and 660 unaccompanied youth (4%).

Overall, there are 2,558 children experiencing homelessness. Of the total children experiencing homelessness, 63 percent were unsheltered. Of the families living with children, 56 percent were unsheltered on the night of the count in January 2019.

White residents, Black or African American residents, and Native American residents are slightly overrepresented among homeless individuals, even after adjusting for poverty. Although, the Hispanic community is less likely to be street homeless or living in shelters, Hispanic residents are more likely to be doubled-up and living in multigenerational households. In Oregon, 14 percent of residents of Hispanic descent live in overcrowded conditions, compared to 2 percent of non-Hispanic Whites.

NA-10 Housing Needs Assessment - 24 CFR 91.305 (a,b,c)

For the purposes of this plan, HUD defines four categories of low and moderate income households, and these definitions will be used consistently throughout the NA and MA sections.

- 0-30% AMI (Area Median Income)= extremely low income
- 30-50% AMI = very low income
- 50-80% AMI = low income
- 80-100% AMI = moderate income

Additionally, HUD considers all households making 100 percent or less of AMI (all four income ranges combined) “low to moderate income” households.

Summary of Housing Needs

Compared to other household types, extremely low income families are most likely to have housing problems. Overall, 8 in 10 extremely low income households in the state’s non-entitlement areas have one or more housing challenges. As household income rises, the share of households with housing needs falls: for example, 80 percent of extremely low income renters (<30% AMI) experience housing problems, compared to 28 percent of low to moderate income renters (80-100% AMI), and 79 percent of extremely low income owners experience housing problems compared to 40 percent of low to moderate income owners. Renter households in non-entitlement areas are slightly more likely than homeowners to experience housing needs (68% v. 55%).

Statewide (including entitlement areas), the total number of renter households with housing needs is expected to increase to 324,000 in five years. The total number of owner households with needs could grow to 213,000.

The following figure presents the number and share of households with current and forecasted housing needs in Oregon across incomes, household types and characteristics.

Statewide Current and Five Year Needs Projections (Current and 2025)

Household Type	Current			2025
	Total Households	# of Households with Housing Need	% of Households with Need	# of Households with Housing Need
Extremely low income families	188,270	168,090	89%	178,024
Low income families	181,895	143,100	79%	151,557
Moderate income families	260,610	141,835	54%	150,217
Middle income families	155,295	54,410	35%	57,626
Renters	575,036	306,230	53%	324,328
Owners	958,394	201,205	21%	213,096
Elderly Households (HH contains at least one person 62+)	526,675	121,515	23%	128,696
Single person households	447,712	49,676	11%	52,612
Large families	110,555	31,275	28%	33,123
LEP households	43,094	7,037	16%	7,453
Households containing persons with hearing, vision, cognitive, ambulatory, self-care and independent living difficulty	427,520	197,551	46%	209,226

Data 2000 Decennial Census, 2018 ACS, 1 year estimates (Most Recent Year), CHAS
Source: 2015

Demographic Overview

According to Portland State University’s Population Research Center’s Annual Report for 2019, Oregon’s population was 4,236,400 in July 2019, an increase of nearly 11 percent from the 2010 decennial Census. Most growth during this period was due to net migration to the state. The most significant demographic changes since the last five-year plan include the significant growth of the state’s older adults, and a modest increase in ethnic diversity of residents.

According to ACS data, shown in the table below, Oregon grew by 9 percent between 2010 and 2018, with household growth keeping a similar pace over the same period (8%). The

supplemental table shows the counties with the largest and smallest population change. Deschutes County’s population grew by 15 percent, while counties in the Portland MSA region experienced comparatively strong growth. Five counties—Sherman, Grant, Malheur, Harney, and Wallowa—lost population.

Housing Needs Assessment Demographics

Demographics	Base Year: 2010	Most Recent Year: 2018	% Change
Population	3,831,074	4,190,713	9%
Households	1,518,938	1,639,970	8%
Median Income	46,560	63,426	36%

Housing Needs Assessment Demographics

Data 2010 Decennial Census (Base Year), 2018 ACS, 1 year estimates (Most Recent Year)
Source:

Counties with Largest Population Increase and Decreases, 2010-2018

County	Base Year: 2010	Most Recent Year: 2018	% Change
Deschutes	157,733	180,640	14.5%
Washington	529,710	581,821	9.8%
Multnomah	735,334	798,647	8.6%
Polk	75,403	81,427	8.0%
Clackamas	375,992	405,788	7.9%
Sherman	1,765	1,605	-9.1%
Grant	7,445	7,183	-3.5%
Malheur	31,313	30,431	-2.8%
Harney	7,422	7,228	-2.6%
Wallowa	7,008	6,924	-1.2%

Housing Needs Assessment Demographics
Counties with Largest Population Increase and Decreases, 2010-2018

Data 2010 Decennial Census (Base Year), 2014-2018 ACS, 1 year estimates (Most Recent Year)
Source: Year)

Number of Households Table

The table below presents the distribution of households by HUD Adjusted Median Family Income (HAAMI) for all Oregon households. The HAAMI share of households is shown in Table 6a. In Oregon, the most common household type is the Small Family household, which represents 41 percent of total households. One in three households include a member age 62 or older. Households with at least one person 75 years old or older or with one or more children six years old or younger (34% and 36% respectively) are more likely to have incomes below the state median household income than other household types.

	0-30% HAAMI	>30-50% HAAMI	>50-80% HAAMI	>80-100% HAAMI	>100% HAAMI
Total Households	188,270	181,895	260,610	155,295	747,360
Small Family Households	52,850	55,255	87,270	60,055	367,565
Large Family Households	11,120	13,685	22,335	12,445	50,970
Household contains at least one person 62-74 years of age	32,790	39,035	59,625	36,395	183,000
Household contains at least one person age 75 or older	20,760	35,045	43,020	18,055	58,950
Households with one or more children 6 years old or younger	30,390	30,550	41,360	24,340	72,620

Total Households Table

Data 2011-2015 CHAS
Source:

	0-30% HAAMI	>30-50% HAAMI	>50-80% HAAMI	>80-100% HAAMI	>100% HAAMI
Total Households	12%	12%	17%	10%	49%
Small Family Households	8%	9%	14%	10%	59%
Large Family Households	10%	12%	20%	11%	46%
Household contains at least one person 62-74 years of age	9%	11%	17%	10%	52%
Household contains at least one person age 75 or older	12%	20%	24%	10%	34%
Households with one or more children 6 years old or younger	15%	15%	21%	12%	36%

Total Households Table

Data 2011-2015 CHAS
Source:

Housing Needs Summary Tables

The following tables contain data pertaining to the housing problems experienced by homeowners and renters based on their income level and household type. The four housing problems that HUD considers includes: cost burden (housing costs exceeding 30% of gross monthly income) and severe housing cost burden (housing costs exceeding 50% of gross monthly income), overcrowdedness, and housing condition which includes units that lack complete kitchen and lack complete plumbing facilities.

The most prevalent housing problem experience by households, both renters and owners, is cost burden.

According to 2011-2015 CHAS data, over 630,000 households in Oregon are low or moderate income (less than 80% AMI), an increase of 30,000 low and moderate income households since the 2016-2020 Consolidated Plan. Among these low and moderate income households:

- Nearly 390,000 households are cost burdened. The number of cost burdened households increased by 7 percent or 25,000 households since the 2016-2020 Consolidated Plan;
- Nearly 17,000 households live in substandard housing which includes lacking complete plumbing or complete kitchen facilities. The number of households in substandard housing decreased by 4 percent or 700 households compared to the 2016-2020 plan.
- Approximately 29,000 households live in units that are either overcrowded or severely overcrowded. The number of households in overcrowded conditions increased by 19 percent or 4,650 households since the last plan.

Based on CHAS data, HUD estimates that 253,550 renter households with low to moderate incomes experience cost burden, with two in five cost extremely low income (below 30% AMI). Around 350,000 low to moderate income owner households experienced cost burden. Unlike renters, the greatest proportion of owner occupied households with cost burden are low income households, with incomes between 50 and 80 percent AMI. Among all low to moderate income households, nearly 60 percent of renters and over 50 percent of owners experienced cost burden.

More than 136,000 low to moderate income renter households—one in three—experience severe cost burden. Among these renter households, severe cost burden is disproportionately experienced by those with extremely low income (below 30% AMI).

1. Housing Problems (Households with one of the listed needs)

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
NUMBER OF HOUSEHOLDS										
Substandard Housing - Lacking complete plumbing or kitchen facilities	6,265	4,540	3,475	1,470	15,750	965	690	820	320	2,795
Severely Overcrowded - With >1.51 people per room (and complete kitchen and plumbing)	2,130	1,760	1,540	485	5,915	305	395	595	475	1,770
Overcrowded - With 1.01-1.5 people per room (and none of the above problems)	5,700	5,870	5,825	2,355	19,750	675	1,570	2,845	1,595	6,685
Housing cost burden greater than 50% of income (and none of the above problems)	83,820	40,650	10,965	1,060	136,495	33,735	27,515	24,435	7,615	93,300

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
Housing cost burden greater than 30% of income (and none of the above problems)	9,520	41,725	53,415	12,395	117,055	7,380	18,385	37,920	26,640	90,325
Zero/negative Income (and none of the above problems)	11,265	0	0	0	11,265	6,330	0	0	0	6,330

Housing Problems Table

Data 2011-2015 CHAS

Source:

2. Housing Problems 2 (Households with one or more Severe Housing Problems: Lacks kitchen or complete plumbing, severe overcrowding, severe cost burden)

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
NUMBER OF HOUSEHOLDS										
Having 1 or more of four housing problems	97,915	52,820	21,810	5,370	177,915	35,680	30,175	28,695	10,005	104,555

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
Having none of four housing problems	24,610	55,625	104,385	58,135	242,755	12,475	43,275	105,720	81,785	243,255
Household has negative income, but none of the other housing problems	11,265	0	0	0	11,265	6,330	0	0	0	6,330

Housing Problems 2

Data 2011-2015 CHAS

Source:

3. Cost Burden > 30%

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
NUMBER OF HOUSEHOLDS								
Small Related	35,360	34,065	25,105	94,530	9,440	12,620	23,630	45,690
Large Related	7,790	7,230	4,265	19,285	2,080	3,055	6,855	11,990
Elderly	18,425	20,635	14,645	53,705	20,130	24,220	23,460	67,810
Other	43,265	29,780	24,525	97,570	10,775	7,720	10,280	28,775
Total need by income	104,840	91,710	68,540	265,090	42,425	47,615	64,225	154,265

Cost Burden > 30%

Data 2011-2015 CHAS

Source:

4. Cost Burden > 50%

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
NUMBER OF HOUSEHOLDS								
Small Related	31,735	15,160	3,440	50,335	8,330	8,705	8,940	25,975
Large Related	6,565	2,685	495	9,745	1,800	2,010	1,785	5,595
Elderly	15,500	11,335	4,765	31,600	15,205	12,465	9,830	37,500
Other	39,610	15,320	3,555	58,485	9,485	5,260	4,355	19,100
Total need by income	93,410	44,500	12,255	150,165	34,820	28,440	24,910	88,170

Cost Burden > 50%

Data 2011-2015 CHAS

Source:

5. Crowding (More than one person per room)

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
NUMBER OF HOUSEHOLDS										
Single family households	6,975	6,475	6,245	2,290	21,985	895	1,545	2,835	1,370	6,645
Multiple, unrelated family households	620	820	810	400	2,650	80	440	645	710	1,875
Other, non-family households	400	365	445	205	1,415	45	4	30	4	83
Total need by income	7,995	7,660	7,500	2,895	26,050	1,020	1,989	3,510	2,084	8,603

Crowding Information – 1/2

Data 2011-2015 CHAS

Source:

	Renter				Owner			
	0-30% AMI	>30- 50% AMI	>50- 80% AMI	Total	0-30% AMI	>30- 50% AMI	>50- 80% AMI	Total
Households with Children Present								

Crowding Information – 2/2

Describe the number and type of single person households in need of housing assistance.

Of the 1.6 million households in Oregon, nearly 450,000, about 27 percent, are single person households according to 2018 ACS estimates. The total number of single person households is evenly split between owner households and renter households. Median household income among single person households is less than half of households overall (\$31,941 compared to \$63,426) and the poverty rate among single person households is 17 percent, compared to 13 percent for Oregonian.

More women live in single person households (57%) than men (43%). Seniors make up approximately 43 percent (195,000) of all single person households.

Based on HUD CHAS data, it is estimated that approximately 11 percent of single person households statewide need housing assistance, or 49,676 households.

The share of Oregon's population age 65 and older increased from 14 percent in 2010 to 18 percent in 2019. The Population Research Center forecasts growth in older until 2035 when it will plateau at nearly 1.1 million residents (22% of all residents). Older adults have the highest likelihood of having a disability (34%) of any of the state's age cohorts.

The growing proportion of older residents in Oregon present significant housing, health and social services, as well transportation related challenges, particularly in rural areas where services may already be limited. In five counties—Grant, Curry, Wheeler, Wallowa, and Gilliam—more than three in 10 residents are age 65 or older. All are very rural areas, where residents often live considerable distances from healthcare and social service providers.

Estimate the number and type of families in need of housing assistance who are disabled or victims of domestic violence, dating violence, sexual assault and stalking.

Residents with disabilities. Fourteen percent of Oregon's residents, or about over 580,000 people, had at least one type of disability according to 2018 ACS estimates. Nearly half are age 65 or older, and many live alone.

The 2011-2015 CHAS data indicate that among low and moderate income households with a member with a disability, 68 percent experience at least one housing problem.

Of the 63,000 units of affordable housing in Oregon's Affordable Housing Inventory (OAH),

- Seven percent or 4,727 of the total restricted units are designated for residents with physical disabilities.
- Two percent are designated for residents with developmental disabilities (1,328 units).

Nearly nine in 10 stakeholder survey respondents characterize the availability of housing stock in their service area that is **accessible** to persons with disabilities as an “insufficient number of accessible units.” Single level units, first floor units, and units with zero step entrances are the most common types of units stakeholders report are most needed in their service area. Making accessibility modifications to existing housing units is also a need. Several respondents described a need for supportive services and peer living options.

Domestic violence, dating violence, sexual assault and stalking survivors. Nearly 178,000 residents 18 and older in Oregon have experienced some type of domestic violence, dating violence, sexual assault and/or stalking by an intimate partner in the previous year. In the most severe cases, these victims must leave their homes:

- 4,200 residents who are victims of domestic violence in Oregon require housing services each year.
- According to the Oregon Coalition Against Domestic and Sexual Violence’s 2019 Striving to Meet the Need annual report, there were more than 8,000 unmet requests for shelter by survivors of intimate partner violence.

One-third of OHCS stakeholder survey respondents identify domestic violence survivors as having disproportionately high housing needs relative to all low and moderate-income populations overall in their service area.

What are the most common housing problems?

Cost burden (housing costs exceeding 30% of gross monthly income) is the most prevalent housing problem experienced by both renter and owner households in Oregon, with nearly 400,000 low income households affected in non-entitlement areas, according to CHAS data. Of these, 220,000 are severely cost burdened. Specifically,

- Nearly 253,600 or 59 percent of all renter households with low to moderate incomes experience cost burden, and 40 percent of cost burdened renters are extremely low income (below 30% AMI).
- Around 350,000 or 52 percent of low to moderate income homeowner households are cost burdened. Unlike renters, the greatest proportion of owner occupied households with cost burden are low income households, those making between 50 and 80 percent AMI.
- More than 136,000 low to moderate income renter households experience severe cost burden, or one in three low to moderate income renters. Among these renter households, severe cost burden is disproportionately experienced by those with

extremely low income (below 30% AMI)—nearly two-thirds of extremely low income renters or 93,410 households are severely cost burdened.

- Similarly, 62 percent or 34,800 extremely low income homeowners are severely cost burdened.
- Compared to the 2016-2020 Consolidated Plan, the number of severely cost burdened households in Oregon decreased by 4 percent or nearly 6,000 households.

Overall, nearly 16,000 low to moderate income renter households and nearly 3,000 low to moderate income owner households experience substandard housing conditions. Renter and owner households with extremely low incomes are more likely than other households to experience substandard housing conditions: 5 percent and 2 percent of these households lack complete plumbing for kitchen facilities, respectively.

Overcrowding—defined as between 1 and 1.5 persons per room—affects 5 percent of low to moderate income renters, or 19,750 households. Severe overcrowding—more than 1.5 persons per room—affects 1 percent, or nearly 6,000 low and moderate income households. Overcrowding is less common among owner households than renter households (2% compared to 5%) but affects 6,700 low and moderate income homeowners. Severe overcrowding affects 1,770 owner households.

The following figure shows the number of OHCS stakeholder survey respondents who selected each of 24 housing activities to meet urgent housing needs in their service area. As shown, housing activities resulting in more rental units for extremely low income households (<30% AMI), very low income households (<60% AMI), and low to moderate income households (<80% AMI) comprise three of the five activities the greatest number of respondents selected to address urgent needs. Emergency shelters for people who are homeless and transitional housing for people moving out of homelessness complete the top five.

Among the following housing activities, where should housing funds be directed to meet urgent needs in your service area? (Select up to 5.)

Housing Activity	# of Responses
More rental units for extremely low income/poverty-level households (at 30% AMI)	61
More rental housing for very low income households (60% AMI or less)	61
Emergency shelters for people who are homeless	49
Transitional housing for people moving out of homelessness	46
More rental housing for low to moderate income households (80% AMI or less)	42
Repurpose vacant/underutilized properties into affordable housing	41
Affordable and accessible housing units for people with disabilities	40
Long-term tenant based rental assistance (6+ months)	38
Funds to pay rental debts accumulated from March 2020 to present (COVID-related)	28
More homes for low to moderate income households to buy (60%-120% AMI)	28
Services that help residents achieve or maintain housing stability (supportive services)	26
Navigators to help residents locate and qualify for affordable housing/housing assistance	24
Emergency assistance to pay utilities	18
Short-term tenant based rental assistance (3-6 months)	15
Preservation of affordable homeownership in manufactured home communities	15
Funds to pay mortgage debts accumulated from March 2020 to present (COVID-related)	14
Assistance to low income homeowners for accessibility modifications (ramps, grab bars)	14
Emergency assistance for vehicle repairs	11
Assistance for health and safety repairs for low and moderate income homeowners	11
Assistance to low income renters for accessibility modifications (ramps, grab bars)	10
Search engine/database to locate and qualify for affordable housing/housing assistance	10
Assistance for health and safety repairs for low and moderate income renters	6
Housing for area workforce	6
Lead-based paint abatement and control	2

Note: n=99.

Source: Root Policy Research from the 2020 OHCS Housing Stakeholder Survey.

Are any populations/household types more affected than others by these problems?

Household types generally experience housing need at comparable rates within each income category. Where differences exist according to CHAS data, they occur for:

- Small and large related owner households, who experience cost burden and severe cost burden at higher rates than other household types;
- Extremely low income renters, whose severe cost burden exceeds 60 percent except for elderly households (49%);
- Overcrowding was most prevalent (54%) among extremely low income non-family households however this group only represented 45 total households.

The following figure depicts the populations stakeholders believe have disproportionately high housing needs relative to all low and moderate income populations. Those with criminal histories, persons with serious and persistent mental illness (SMPI), those who are currently precariously housed, and persons with substance use disorders are considered to have disproportionate housing needs by at least half of respondents.

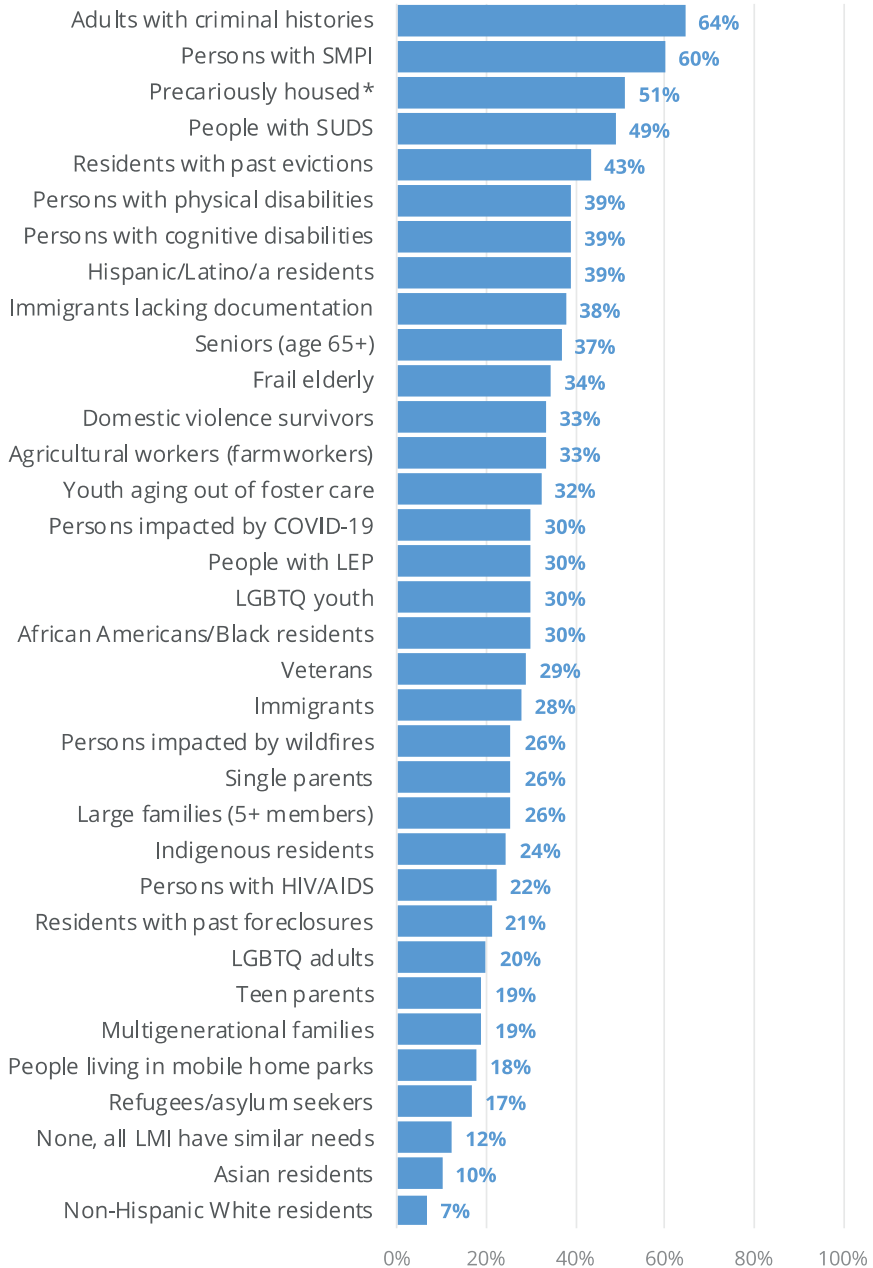
Which of the following populations have disproportionately high housing needs relative to all low and moderate-income populations overall in your service area?

Note:

*Precariously housed are residents living in non-traditional and/or multiple-family/“couch-surfing” situations who are vulnerable to being evicted or kicked out (e.g., due to a fight with friends). SUDS = substance use disorders, SPMI = serious and persistent mental illness.

Source:

Root Policy Research from the 2020 OHCS Housing Stakeholder Survey.



Describe the characteristics and needs of Low-income individuals and families with children (especially extremely low-income) who are currently housed but are at imminent risk of either residing in shelters or becoming unsheltered 91.205(c)/91.305(c)). Also discuss the needs of formerly homeless families and individuals who are receiving rapid re-housing assistance and are nearing the termination of that assistance

Oregonians considered by stakeholders to be most at-risk of homelessness are those with serious and persistent mental illness (SMPI), substance use disorders, criminal histories, those who are precariously housed, and persons with cognitive disabilities.

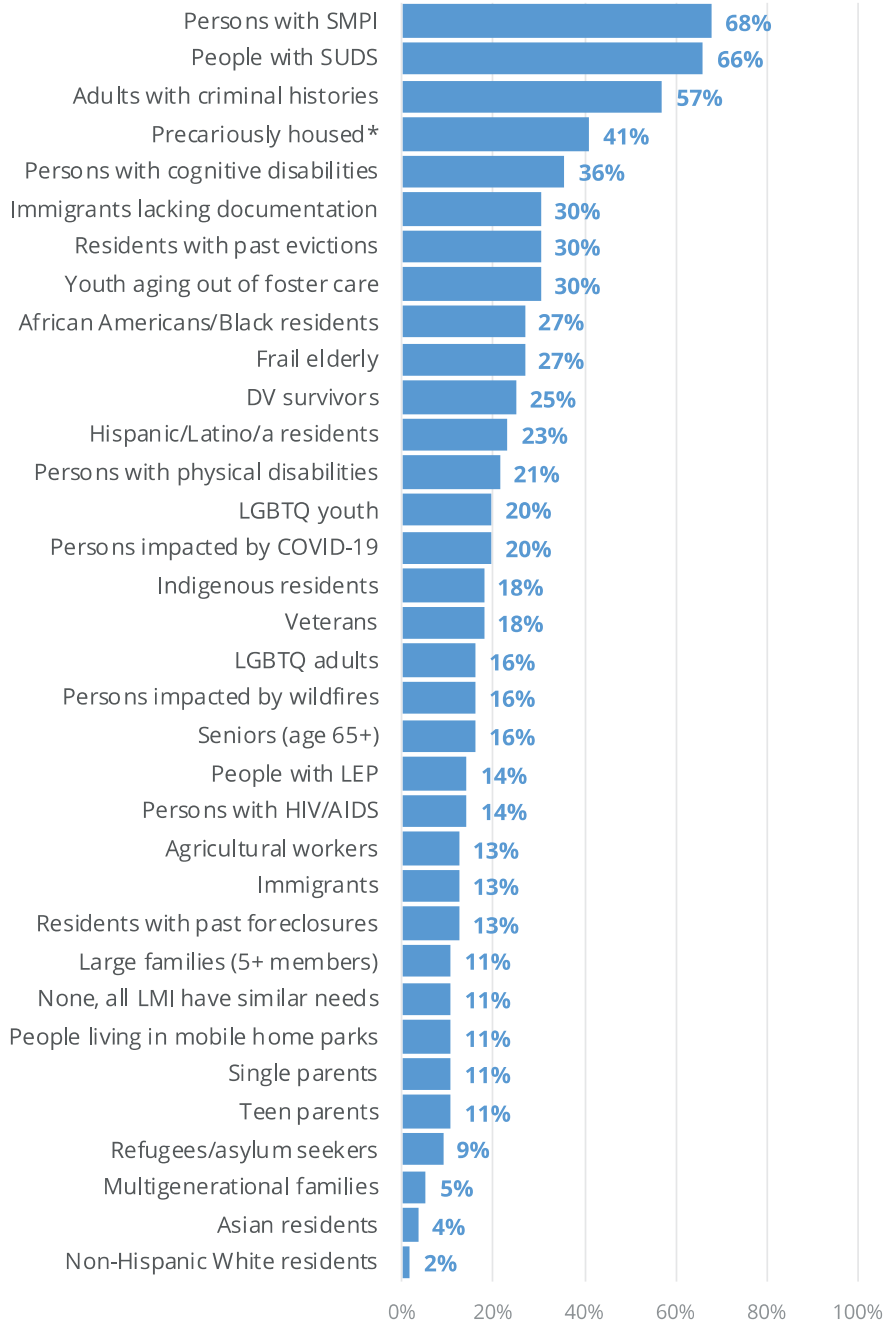
Among low or moderate income households, which populations are disproportionately at higher risk for homelessness in your service area?

Note:

*Precariously housed are residents living in non-traditional and/or multiple-family/"couch-surfing" situations who are vulnerable to being evicted or kicked out (e.g., due to a fight with friends). SUDS = substance use disorders, SPMI = serious and persistent mental illness.

Source:

Root Policy Research from the 2020 OHCS Housing Stakeholder Survey.



The COVID pandemic and resulting economic and social consequences place additional households at-risk of homelessness due to job loss, mental health difficulties, and increased substance use disorders.

Most stakeholders (60%) believe that homelessness has increased in their area due to the COVID pandemic. Nearly two in five stakeholders' assessment of the populations most at-risk of homelessness changed since the onset of the COVID pandemic. These stakeholders observe

that immigrants who are undocumented are especially at-risk of homelessness due to job loss and inability to participate in federal financial relief and other benefits programs. Other populations not previously at-risk of homelessness are those who experience job loss and long-term unemployment resulting from business closures. Several stakeholders mentioned barriers to accessing services resulting from lack of access to public facilities like libraries to access the Internet or print required forms.

- *“People that don't have access to public benefits because of documentation status have been more impacted. Higher cases of COVID, more job loss, not able to access stimulus payment and unemployment benefits.” (Stakeholder survey respondent)*
- *“I have noticed more unemployment due to businesses having to downsize employees or close down the business. More cases of suicide, and drug use leading to homelessness in most cases.” (Stakeholder survey respondent)*
- *“Harder to get access to assistance—no libraries open to get WiFi or print things. Other services closed.” (Stakeholder survey respondent)*

Households receiving Rapid Re-housing (RRH) receive support from area Community Action Agencies (CAA). RRH assistance has a 24 month max over a 3 year period. If a household has reached that limit and still is struggling, the CAA’s continuum of services provides support. The CAA develops a plan for that household and provides assistance from a variety of funding sources.

If a jurisdiction provides estimates of the at-risk population(s), it should also include a description of the operational definition of the at-risk group and the methodology used to generate the estimates:

The state does not collect data from Continuum of Care on clients that received services and are at imminent risk of losing their housing. In the past, the state has used the number of households with incomes at or below 30 percent of AMI who spend more than half of their income on housing and utility costs as a proxy, given their limited capacity to absorb external financial pressures. According to HUD’s 2011-2015 CHAS data, a little more than 128,210 households at this income level were severely cost burdened; 93,410 of these were renters and 34,800 were homeowners.

OHCS uses HUD’s published definition of at-risk of homelessness: For individuals and families that includes An individual or family who: (i) Has an annual income below 30% of median family income for the area; AND (ii) Does not have sufficient resources or support networks immediately available to prevent them from moving to an emergency shelter or another place defined in Category 1 of the “homeless” definition; AND (iii) Meets one of the following

conditions: (A) Has moved because of economic reasons 2 or more times during the 60 days immediately preceding the application for assistance; OR (B) Is living in the home of another because of economic hardship; OR (C) Has been notified that their right to occupy their current housing or living situation will be terminated within 21 days after the date of application for assistance; OR (D) Lives in a hotel or motel and the cost is not paid for by charitable organizations or by Federal, State, or local government programs for low-income individuals; OR (E) Lives in an SRO or efficiency apartment unit in which there reside more than 2 persons or lives in a larger housing unit in which there reside more than one and a half persons per room; OR (F) Is exiting a publicly funded institution or system of care; OR (G) Otherwise lives in housing that has characteristics associated with instability and an increased risk of homelessness, as identified in the recipient's approved Con Plan.

Specify particular housing characteristics that have been linked with instability and an increased risk of homelessness

As discussed, above severe cost burden, paying over 50 percent of total income on housing related expenses, is linked with instability and increased risk of homelessness. Other characteristics that are linked with housing instability and increased risk of homelessness include domestic violence, unstable employment, and increased risk of health issues all of which may force unexpected and sudden increased costs or decreased income on a household that does not have sufficient financial resources or savings to keep the households afloat through periods of lost income or to meet unexpected expenses. Stakeholders participating in the community engagement process considered residents with criminal histories, persons with serious and persistent mental illness (SMPI), those who are currently precariously housed, and persons with substance use disorders to have disproportionate housing needs and be at increased risk of homelessness.

NA-15 Disproportionately Greater Need: Housing Problems - 91.305 (b)(2)

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.

Introduction

This section discusses housing problems as defined by HUD, using HUD-prepared housing needs data. The tables show the number of Oregon households that have housing problems by income and race and ethnicity. The data in this section come from HUD’s 2011-2015 CHAS dataset which breaks households down by race, ethnicity, income, and housing problems.

Disproportionate housing needs in a population are defined as having one or more of the following four housing problems in greater proportion than the jurisdiction as a whole or than White households:

- 1) Living in housing that lacks complete kitchen facilities;
- 2) Living in housing that lacks complete plumbing facilities;
- 3) More than one person per room (overcrowded); and
- 4) Cost burden greater than 30 percent of Area Median Income (AMI).

0%-30% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	150,422	20,220	17,615
White	112,159	16,302	13,855
Black / African American	6,105	934	487
Asian	5,340	727	1,493
American Indian, Alaska Native	2,066	350	246
Pacific Islander	778	70	75
Hispanic	17,985	1,269	862

Number of Households Disproportionally Greater Need 0 - 30% AMI

Data 2011-2015 CHAS

Source:

*The four housing problems are:

- 1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30% of AMI

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems
Jurisdiction as a whole	88%	12%
White	87%	13%
Black / African American	87%	13%
Asian	88%	12%
American Indian, Alaska Native	86%	14%
Pacific Islander	92%	8%
Hispanic	93%	7%

Percent of Households with Disproportionally Greater Need 0 - 30% AMI

Data 2011-2015 CHAS, Totals for percentages excludes no/negative income.

Source:

*The four housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30% of AMI

30%-50% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	143,124	38,887	0
White	109,688	32,622	0
Black / African American	3,065	571	0
Asian	4,405	838	0
American Indian, Alaska Native	1,768	532	0
Pacific Islander	647	4	0
Hispanic	19,336	3,383	0

Disproportionally Greater Need 30 - 50% AMI

Data 2011-2015 CHAS

Source:

*The four housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30% of AMI

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Disproportionate Need
Jurisdiction as a whole	79%	21%	No
White	77%	23%	No
Black / African American	84%	16%	No
Asian	84%	16%	No
American Indian, Alaska Native	77%	23%	No
Pacific Islander	99%	1%	Yes
Hispanic	85%	15%	No

Percent of Households with Disproportionally Greater Need 30 - 50% AMI

Data 2011-2015 CHAS, Totals for percentages excludes no/negative income.

Source:

*The four housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30% of AMI

50%-80% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	141,739	118,742	0
White	114,460	98,871	0
Black / African American	2,578	1,418	0
Asian	4,004	2,561	0
American Indian, Alaska Native	1,123	1,253	0
Pacific Islander	428	493	0
Hispanic	15,689	11,396	0

Disproportionally Greater Need 50 - 80% AMI

Data 2011-2015 CHAS

Source:

*The four housing problems are:

1. Lacks complete kitchen facilities,
2. Lacks complete plumbing facilities,
3. More than one person per room,
4. Cost Burden greater than 30% of AMI

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Disproportionate Need
Jurisdiction as a whole	54%	46%	No
White	54%	46%	No
Black / African American	65%	35%	Yes
Asian	61%	39%	No
American Indian, Alaska Native	47%	53%	No
Pacific Islander	46%	54%	No
Hispanic	58%	42%	No

Percent of Households with Disproportionally Greater Need 50 - 80% AMI

Data 2011-2015 CHAS, Totals for percentages excludes no/negative income.

Source:

*The four housing problems are:

1. Lacks complete kitchen facilities,
2. Lacks complete plumbing facilities,
3. More than one person per room,
4. Cost Burden greater than 30% of AMI

80%-100% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	54,461	100,870	0
White	45,529	83,849	0
Black / African American	691	1,158	0
Asian	1,849	2,482	0
American Indian, Alaska Native	469	883	0
Pacific Islander	183	198	0
Hispanic	4,464	9,367	0

Disproportionally Greater Need 80 - 100% AMI

Data 2011-2015 CHAS

Source:

*The four housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30% of AMI

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Disproportionate Need
Jurisdiction as a whole	35%	65%	No
White	35%	65%	No
Black / African American	37%	63%	No
Asian	43%	57%	No
American Indian, Alaska Native	35%	65%	No
Pacific Islander	48%	52%	Yes
Hispanic	32%	68%	No

Percent of Households with Disproportionally Greater Need 80 - 100% AMI

Data 2011-2015 CHAS, Totals for percentages excludes no/negative income

Source:

*The four housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30% of AMI

Discussion

This section discusses the income categories in which a racial or ethnic group has a disproportionately greater share of housing problems.

Extremely Low-income: 0-30 Percent of Area Median Income

- All groups have relatively high rates of housing problems, but no single group experiences a disproportionately high rate of need relative to the state as a whole.
- At this income level, 88 percent of all households have at least one of the four housing problems.

Very Low income: 30-50 Percent of Area Median Income

- Similar to the 0-30% AMI income level, all households in this income group have relatively high rates of housing need (79% overall).
- Pacific Islander households experience disproportionately high rates of housing need (99%) compared to White households (77%) and the jurisdiction as a whole (79%).

Low Income: 50-80 Percent of Median Income

- At this income level, 54 percent of households in the jurisdiction overall have at least one of the four housing problems.

- Black/African American households experience disproportionately high rates of housing need (65%) compared to White households and Oregon overall (both 54%).

Moderate Income: 80-100 of Area Median Income

- At this income level, 35 percent of households have at least one of four housing problems.
- Pacific Islander households experience a disproportionately high rate of need (48%) relative to White households and the jurisdiction as a whole at this income level (both 35%).

It is important to note that the frequent occurrence of Pacific Islanders as having housing problems is largely due to the small numbers of residents in this racial category. The number of Pacific Islanders in Oregon is very small overall and represents less than one percent of the residents with housing problems in the state overall. The small sample size of Pacific Islanders in Oregon leads to large margins of error in the CHAS estimates, and therefore the numbers presented here should be used with caution.

NA-20 Disproportionately Greater Need: Severe Housing Problems – 91.305(b)(2)

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.

Introduction

This section discusses severe housing needs as defined by HUD, using HUD-prepared housing needs data. The tables show the number of Oregon households that have severe housing needs by income, race, and ethnicity.

Needs are defined as one or more of the following housing problems:

- Housing lacks complete kitchen facilities
- Housing lacks complete plumbing facilities
- Household has more than 1.5 persons per room
- Household cost burden exceeds 50 percent of AMI.

0%-30% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	133,566	37,156	17,615
White	98,688	29,718	13,855
Black / African American	5,560	1,468	487
Asian	4,881	1,174	1,493
American Indian, Alaska Native	1,791	624	246
Pacific Islander	728	120	75
Hispanic	16,482	2,764	862

Severe Housing Problems 0 - 30% AMI

Data 2011-2015 CHAS

Source:

*The four severe housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden over 50% of AMI

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Disproportionate Need
Jurisdiction as a whole	78%	10%	No

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Disproportionate Need
White	77%	11%	No
Black / African American	79%	7%	No
Asian	81%	25%	No
American Indian, Alaska Native	74%	10%	No
Pacific Islander	86%	9%	No
Hispanic	86%	4%	No

Percent of Households with Severe Housing Problems 0 – 30% AMI

Data 2011-2015 CHAS, Totals for percentages excludes no/negative income.

Source:

*The four severe housing problems are:

1. Lacks complete kitchen facilities,
2. Lacks complete plumbing facilities,
3. More than 1.5 persons per room,
4. Cost Burden over 50% of AMI

30%-50% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	82,997	98,933	0
White	63,736	78,487	0
Black / African American	1,893	1,735	0
Asian	2,757	2,501	0
American Indian, Alaska Native	1,082	1,210	0
Pacific Islander	414	231	0
Hispanic	10,702	12,017	0

Severe Housing Problems 30 - 50% AMI

Data 2011-2015 CHAS

Source:

*The four severe housing problems are:

1. Lacks complete kitchen facilities,
2. Lacks complete plumbing facilities,
3. More than 1.5 persons per room,
4. Cost Burden over 50% of AMI

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Disproportionate Need
Jurisdiction as a whole	46%	10%	No
White	45%	11%	No
Black / African American	52%	7%	No
Asian	52%	25%	No
American Indian, Alaska Native	47%	10%	No
Pacific Islander	64%	9%	Yes
Hispanic	47%	4%	No

Percent of Households with Severe Housing Problems 30 – 50% AMI

Data 2011-2015 CHAS, Totals for percentages excludes no/negative income.
Source:

*The four severe housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden over 50% of AMI

50%-80% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	50,547	209,979	0
White	39,000	174,315	0
Black / African American	892	3,100	0
Asian	1,492	5,058	0
American Indian, Alaska Native	317	2,097	0
Pacific Islander	203	712	0
Hispanic	7,462	19,598	0

Severe Housing Problems 50 - 80% AMI

Data 2011-2015 CHAS
Source:

*The four severe housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden over 50% of AMI

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Disproportionate Need
Jurisdiction as a whole	19%	81%	No
White	18%	82%	No
Black / African American	22%	78%	No
Asian	23%	77%	No
American Indian, Alaska Native	13%	87%	No
Pacific Islander	22%	78%	No
Hispanic	28%	72%	No

Percent of Households with Severe Housing Problems 50 – 80% AMI

Data 2011-2015 CHAS, Totals for percentages excludes no/negative income.

Source:

*The four severe housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden over 50% of AMI

80%-100% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	15,411	139,911	0
White	11,890	117,392	0
Black / African American	252	1,597	0
Asian	668	3,669	0
American Indian, Alaska Native	102	1,256	0
Pacific Islander	83	297	0
Hispanic	2,126	11,724	0

Severe Housing Problems 80 - 100% AMI

Data 2011-2015 CHAS

Source:

*The four severe housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden over 50% of AMI

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Disproportionate Need
Jurisdiction as a whole	10%	90%	No
White	9%	91%	No
Black / African American	14%	86%	No
Asian	15%	85%	No
American Indian, Alaska Native	8%	92%	No
Pacific Islander	22%	78%	Yes
Hispanic	15%	85%	No

Percent of Households with Severe Housing Problems 80 – 100% AMI

Data 2011-2015 CHAS, Totals for percentages excludes no/negative income

Source:

*The four severe housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden over 50% of AMI

Discussion

This section discusses the income categories in which a racial or ethnic group has a disproportionately greater severe housing need.

Extremely Low-income: 0-30 Percent of Area Median Income

- Like the previous discussion on housing needs, all racial/ethnic groups at this income level have relatively high rates of severe housing problems, but no single group experiences a disproportionately high rate of need relative to the jurisdiction as a whole.
- At this income level, 78 percent of all households have a severe housing problem.

Very Low-income: 30-50 Percent of Area Median Income

- Forty-six percent of all households earning 30-50% of AMI in the jurisdiction have a severe housing need.
- Pacific Islander (64%) households experience disproportionately high severe housing problems.

Low-Income: 50-80 Percent of Median Income

- At this income level, 19 percent of households in the jurisdiction overall have a severe housing problem.

- No single racial/ethnic group experiences a disproportionately high rate of severe housing problems relative to the jurisdiction as a whole at this income level.

Moderate Income: 80-100 of Area Median Income

- Only 10 percent households earning 80-100% AMI in the jurisdiction have a severe housing problem.
- These data indicate that Pacific Islander households at this income level experience severe housing problems at a disproportionately high rate (22%).

It is important to note that the frequent occurrence of Pacific Islanders as having housing problems is largely due to the small numbers of residents in this racial category. The number of Pacific Islanders in Oregon was very small overall and represented less than one percent of the residents with housing problems in the state overall. The small sample size of Pacific Islanders in Oregon leads to large margins of error in the CHAS estimates, and therefore the numbers presented here should be used with caution.

NA-25 Disproportionately Greater Need: Housing Cost Burdens – 91.305 (b)(2)

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.

Introduction

This section provides data on households with disproportionate levels of housing cost burden. Housing cost burden occurs when households pay more than 30 percent of their gross household income toward housing costs, which includes utilities. Severe housing cost burden occurs when housing costs are 50 percent or more of gross household income.

Housing Cost Burden

Housing Cost Burden	<=30%	30-50%	>50%	No / negative income (not computed)
Jurisdiction as a whole	968,081	290,088	256,381	18,881
White	830,310	236,664	202,846	14,803
Black / African American	10,704	4,826	7,899	617
Asian	30,729	8,776	8,690	1,638
American Indian, Alaska Native	7,465	2,755	3,016	251
Pacific Islander	1,943	994	968	75
Hispanic	66,352	28,373	24,442	886

Greater Need: Housing Cost Burdens AMI

Data 2011-2015 CHAS

Source

:

Housing Cost Burden	<=30%	30-50%	>50%	30-50% Disproportionate Cost Burden	> 50% Disproportionate Cost Burden
Jurisdiction as a whole	64%	19%	17%	No	No
White	65%	19%	16%	No	No
Black / African American	46%	21%	34%	No	Yes
Asian	64%	18%	18%	No	No
American Indian, Alaska Native	56%	21%	23%	No	No

Pacific Islander	50%	26%	25%	No	No
Hispanic	56%	24%	21%	No	No

Greater Need: Percent Housing Cost Burdens AMI

Data 2011-2015 CHAS

Source:

Discussion

Overall cost burden in the state of Oregon was 36 percent according to HUD provided 2011-2015 CHAS data. One in five Oregon households experience cost burden of 30 to 50 percent and nearly one in five are severely cost burdened.

African American households are disproportionately more likely to be severely cost burdened than other Oregon households. One in three (34%) African American households are severely cost burdened, paying more than 50 percent of their income for housing costs. The share of Oregon households overall with severe cost burden was much lower (17%).

NA-35 Public Housing – (Optional)

Introduction

Although this section of the Consolidated Plan is optional for states, the state of Oregon feels it is important to include the needs of current voucher holders and residents residing in public housing, as well as families on the wait list for these programs, to add greater detail and clarity on the needs of low income renters, and the availability of programs to accommodate those needs.

Totals in Use

	Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers			Special Purpose Voucher		
				Total	Project - based	Tenant - based	Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
# of units vouchers in use	0	701	5,365	32,028	42	30,878	399	66	515

Public Housing by Program Type

*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition

Data PIC (PIH Information Center)
Source:

Characteristics of Residents

	Program Type							
	Certificate	Mod-Rehab	Public Housing	Vouchers			Special Purpose Voucher	
				Total	Project - based	Tenant - based	Veterans Affairs Supportive Housing	Family Unification Program
# Homeless at admission	0	64	44	155	6	72	76	1
# of Elderly Program Participants (>62)	0	79	1,289	6,514	2	6,342	60	2
# of Disabled Families	0	222	1,960	11,222	27	10,512	217	6
# of Families requesting accessibility features								
# of HIV/AIDS program participants	0	0	0	0	0	0	0	0
# of DV victims	0	0	0	0	0	0	0	0

Characteristics of Public Housing Residents by Program Type

Data PIC (PIH Information Center)

Source:

Race of Residents

Race	Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers			Special Purpose Voucher		
				Total	Project - based	Tenant - based	Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
White	0	588	4,386	26,836	39	25,777	345	59	498
Black/African American	0	73	668	3,566	3	3,512	39	1	5
Asian	0	14	110	686	0	677	1	1	6
American Indian/Alaska Native	0	24	152	787	0	759	14	5	6
Pacific Islander	0	2	46	153	0	153	0	0	0
Other	0	0	3	0	0	0	0	0	0

***includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition**

Race of Public Housing Residents by Program Type

Data PIC (PIH Information Center)

Source:

Ethnicity of Residents

Ethnicity	Certificate	Mod-Rehab	Public Housing	Program Type					
				Vouchers			Special Purpose Voucher		
				Total	Project - based	Tenant - based	Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
Hispanic	0	30	657	2,616	5	2,555	9	6	23
Not Hispanic	0	671	4,705	29,412	37	28,323	390	60	492

***includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition**

Ethnicity of Public Housing Residents by Program Type

Data PIC (PIH Information Center)

Source:

Section 504 Needs Assessment: Describe the needs of public housing tenants and applicants on the waiting list for accessible units:

While OHCS does not manage public housing units or maintain a waitlist, participants in the community engagement process described the need for affordable housing that meets the needs of residents with disabilities.

As shown in the figure below, stakeholders think there are an insufficient number of housing units accessible to persons with disabilities in their service area, as well as an insufficient number of housing units that are visitable by persons with disabilities.

Housing Stock Accessibility and Visitability for Persons with Disabilities

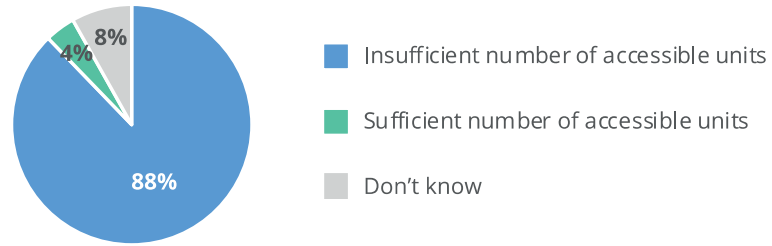
Note:

n=49 and n=46.

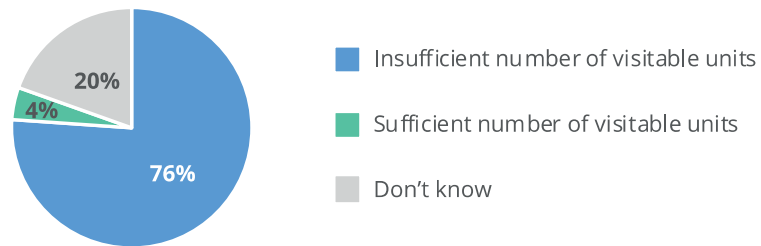
Source:

Root Policy Research from the 2020 OHCS Housing Stakeholder Survey.

How would you characterize the availability of housing stock in the area you serve that is **accessible** to persons with disabilities?



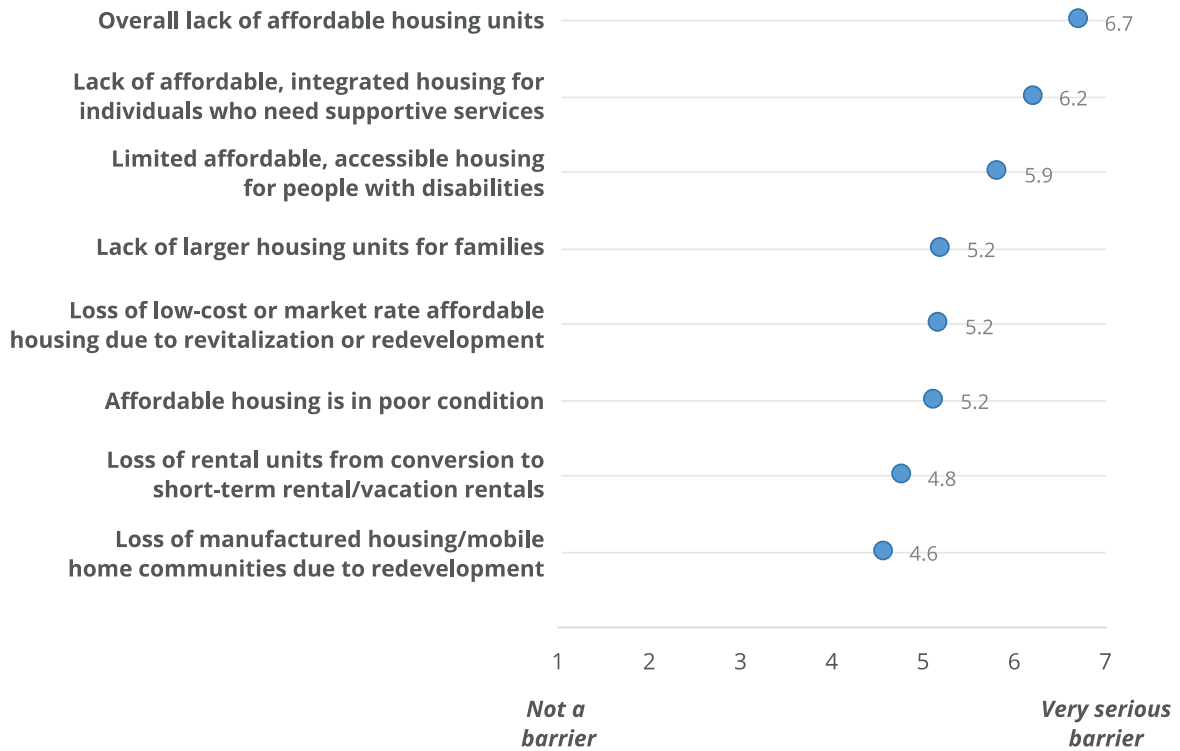
How would you characterize the availability of housing stock in the area you serve that is **visitable** to persons with disabilities?



In a focus group with extremely low income residents with disabilities, all of the participants lived in publicly-supported housing, including LIHTC, project-based Section 8, and voucher programs. A voucher program participant shared that many landlords did not want to rent to voucher program participants—despite the state’s source of income laws. Another participant shared that it took her 10 months to find an accessible unit in Tillamook County; the unit she eventually rented, a single-level cottage, does not have the ramp she needs to safely enter the building. Because she is able to stand, she uses her wheelchair to work her way up the two steps required to enter her home. This resident is in the process of trying to find resources to build a ramp.

Among the eight potential barriers to housing choice related to housing availability, stakeholders considered the overall lack of affordable housing units; lack of affordable, integrated housing for individuals who need supportive services; and the limited affordable, accessible housing for people with disabilities to be the most serious barriers to housing choice. Conversion of rentals to short-term or vacation rentals and the loss of manufactured housing/mobile home communities to development were considered relatively less serious barriers.

Seriousness of Potential Housing Choice Barriers Locally—Housing Availability Factors



Note: Rated on a scale from 1 to 7, where 1=Not a Barrier and 7=Very serious Barrier. n=72.

Source: Root Policy Research from the 2020 OHCS Housing Stakeholder Survey.

What are the number and type of families on the waiting lists for public housing and section 8 tenant-based rental assistance? Based on the information above, and any other information available to the jurisdiction, what are the most immediate needs of residents of public housing and Housing Choice voucher holders? How do these needs compare to the housing needs of the population at large?

OHCS does not manage public housing units or maintain a waitlist. However, the needs of households on public housing and voucher waitlists are likely similar to those with extremely low and very low household incomes, households that are severely cost burdened, and persons with disabilities whose accessibility needs are not met in their current housing situation.

NA-40 Homeless Needs Assessment – 91.305(c)

Introduction:

Each year there are nationwide efforts to count every homeless person across the country. Occurring every January, these efforts—known as Point-in-Time (PIT) Counts—attempt to provide a snapshot of both sheltered and unsheltered persons experiencing homelessness. In January 2019 volunteers in Oregon collected data to count the number of persons living on the street (unsheltered), as well persons living in a range of shelters including emergency shelters and transitional housing throughout the state (sheltered). Researchers also collected demographic characteristics of the people they encountered, including age, gender, race, ethnicity, veteran status.

The 2019 Point-in-Time Count identified nearly 16,000 persons experiencing homelessness in Oregon. Among these residents, 36 percent (5,734 people) were sheltered while the majority, 64 percent, were unsheltered (10,142 people). The number of Oregonians experiencing homelessness has been increasing and is up 13 percent since 2017, when there were a total of nearly 14,000 people living in homelessness.

Most of this increase was driven by an increase in the unsheltered population which grew by 27 percent since 2017, from nearly 8,000 to over 10,000. The sheltered population decreased by 5 percent.

Most stakeholders (60%) believe that homelessness has increased even more than identified by the prior count due to the COVID pandemic.

If data is not available for the categories "number of persons becoming and exiting homelessness each year," and "number of days that persons experience homelessness," describe these categories for each homeless population type (including chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth):

Adults living alone comprise the majority (74%) of all individuals living in homelessness (11,694 individuals) included in the 2019 PIT. There were 4,902 chronically homeless people reported in the 2019 PIT count, or 31 percent of all persons experiencing homelessness. The night of the PIT county four out of five people who are chronically homeless were unsheltered.

Families with children. There were over 3,500 individuals living with adults and children (22%) and 660 children living without adults (4%). Overall, there are 2,558 children experiencing homelessness. Of the total children experiencing homelessness, 63 percent were unsheltered. Of the families living with children, 56 percent were unsheltered on the night of the count in January 2019.

People living in households with children represented comprise one in 20 (6%) chronically homeless residents (293 individuals), and only one in three of these chronically homeless families were sheltered.

Veterans. There were 1,438 veteran or living in homelessness in Oregon during the count in 2019. Among them 43 percent were chronically homeless (619 individuals) which represents 12 percent of the total number of people experiencing chronic homelessness in Oregon. Fifty-eight percent of veterans (828 individuals) were unsheltered.

Chronic substance abuse and mental illness. There were over 3,100, one in five, individuals suffering from severe mental illness who were homeless. The vast majority of these individuals (72%) were unsheltered. Many individuals suffered from chronic substance abuse, nearly 2,900, among whom 73 percent were unsheltered. Victims of domestic violence were also counted among those experiencing homelessness in 2019.

Intimate partner violence survivors. One in ten individuals experiencing homelessness were victims of domestic violence, a total over 1,500 individuals.

Persons with HIV/AIDS. Individuals living with HIV/AIDS and experiencing homelessness represented 1 percent of the total population of homeless individuals, a total of 152 individuals.

Nature and Extent of Homelessness

Population	Total	Sheltered	Unsheltered	Chronically Homeless	Not Chronically Homeless	
Number	15,876	5,734	10,142	4,902	10,974	
Percent	100%	36%	64%	31%	69%	

Data Continuums of Care (CoCs)
Source:

Nature and Extent of Homelessness by Population Subgroup

Population	Estimated Number of People experiencing Homelessness			
	Emergency	Sheltered Transitional Housing	Unsheltered	Total

Population	Estimated Number of People experiencing Homelessness			
Total	3,748	1,986	10,142	15,876
People in Households without Children	2,813	1,294	7,587	11,694
People in Households with Adults and Children	874	666	1,982	3,522
People in Households with Only Children	61	26	573	660
Severely Mentally Ill	538	321	2,265	3,125
Chronic Substance Abuse	374	403	2,109	2,886
Veterans	307	304	827	1,438
HIV/AIDS	34	21	97	152
Victims of Domestic Violence	324	61	1,171	1,556

Data Continuums of Care (CoCs)
Source:

Chronic Homelessness by Household Type

Population	Estimated Number of People experiencing Homelessness			Total
	Sheltered		Unsheltered	
	Emergency	Transitional Housing		
Total	1,030	6	3,866	4,902
People in Households without Children	929	6	3,665	4,600
People in Households with Adults and Children	99	0	194	293
People in Households with Only Children	2	0	7	9

Data Continuums of Care (CoCs)
Source:

Nature and Extent of Homelessness by Population Subgroup—Rural Homelessness

Population	Estimated Number of People experiencing Homelessness			Total
	Sheltered		Unsheltered	
	Emergency	Transitional Housing		
Total	1,075	573	5,438	7,086
People in Households without Children	635	347	2,858	3,840
People in Households with Adults and Children	172	139	1,027	1,338
People in Households with Only Children	35	18	411	464
Chronically Homeless Individuals	172	0	872	1,044
Chronically Homeless Families	10	0	61	71
Veterans	51	69	209	329
HIV/AIDS	0	0	0	0

Data Continuum of Care (CoCs) Balance of State
Source:

For persons in rural areas who are homeless or at risk of homelessness, describe the nature and extent of sheltered and unsheltered homelessness in the jurisdiction.

Rural areas of Oregon experience distinctive challenges in providing shelter and services to people experiencing homelessness. Unreliable funding, access to available services and case management, and transportation issues are chief among these challenges. Additionally, Point-in-Time (PIT) counts that are necessary to achieve adequate funding are arduous due to the geographic dispersion of people and the lack of visibility of people experiencing homelessness, which leads to resource, staffing, and volunteer shortages. Additionally, Oregon’s most rural regions often experience extreme weather events that make unsheltered homelessness extremely risky and potentially life threatening. This pairing of limited shelter and housing availability in Rural Oregon, combined with the very real risks of unsheltered homelessness make for a challenging environment for this critical population.

In addition to the data shared in the chart, HOPWA's surveillance data reflects the annual averages of housing status for people living with HIV at the time of new diagnosis. On average annually, there are 7 people newly diagnosed living in rural Oregon who are homeless or unstably housed.

Estimate the number and type of families in need of housing assistance for families with children and the families of veterans.

Families with children. According to the January 2019 PIT count, there were over 3,500 families living in homelessness. Of the total number individuals in families living with children, 56 percent were unsheltered. Only 1,627 individuals in families with children and children living alone were sheltered on the night of the count in 2019.

Inherent limitations to the PIT methodology mean that the numbers represented in the count necessarily do not represent a full picture of the extent of Oregonians experiencing homelessness.

Student data provided by Oregon's Department of Education (DOE) reveals a more complete picture of the extent of homelessness or students who are without stable housing over the course of the school year. For the 2017-2018 school year, DOE estimated more than 22,000 children experienced homelessness or were without stable housing. Of these youth, 74 percent were living with friends or family (doubled up)—a situation at high risk for homelessness. DOE estimates also reveal a greater number of sheltered and unsheltered number of children (1,841 and 2,572 youth respectively); these estimates include youth living in hotels (1,244 youth).

An analysis of the emergency shelter gap among households with children found that emergency units are underutilized by families with children. The 2019 Oregon Statewide Shelter study included a survey of 232 adults experiencing homelessness. Personal safety concerns, personal privacy concerns, restrictive check in and check out time, and overcrowding in shelter were the top barriers to accessing shelters overall and may explain in part why emergency shelter units for families with children are underutilized.

Veterans. A total of 1,439 veterans experiencing homelessness were included in the 2019 PIT. Nearly three out of five (58%) veterans experiencing homelessness are chronically homeless, compared to the statewide chronically homeless rate of 31 percent. Veterans who are homeless are somewhat more likely to be sheltered compared to all Oregonians experiencing homelessness (42% vs. 36%).

Emergency Shelter Gap Among Households with Children

Population	Number of Emergency Shelter “Units” for Households with Children	Number of Households with Children in Emergency Shelter	Percent Family “Units” Occupied	Number of Unsheltered Households with Children	Number of Unsheltered Persons in Households with Children
Total	434	298	69%	606	1,813

Data Oregon Statewide Shelter Study, 2018
Source:

Homelessness Among Veterans

Population	Total	Sheltered	Unsheltered	Chronically Homeless	Not Chronically Homeless
Number	1,439	611	828	820	619
Percent	100%	42%	58%	57%	43%

Data 2019 Point-in-Time Homeless Count
Source:

Describe the Nature and Extent of Homelessness by Racial and Ethnic Group.

HUD’s CoC Racial Equity Analysis Tool (version 2.1) compiles data on the race and ethnicity of individuals experiencing homelessness from Continuums of Care across the country. Based on the January 2019 PIT counts in Oregon, analysis of the racial and ethnic identity of persons experiencing homelessness found:

- More than 1,500 individuals living in homelessness identified as Hispanic or Latino (10%), a slightly lower proportion than in Oregon’s population overall (13%);
- A total of 6 percent identified as Black or African American—three times the share of Black or African American residents (2%);
- One in 20 (5%) identified as Native American, two percentage points higher than the Native American population share (3%);

- Individuals who identified as either Asian or Native Hawaiian/Pacific Islander each represented 1 percent of the total persons included in the 2019 PIT

Based on 2018 American Community Survey (ACS) population estimates for 2018, Black or African American individuals and Native American individuals are overrepresented among the population living in homelessness. Conversely, Asian individuals, White individuals, and Hispanic individuals are underrepresented.

Homelessness by Race/Ethnicity

Population	Total	% Total	Unsheltered	% Unsheltered	Sheltered	% Sheltered
Asian	158	1%	71	45%	87	55%
Black/African American	948	6%	465	49%	483	51%
Native American	790	5%	521	66%	269	34%
Native Hawaiian/Pacific Islander	158	1%	93	59%	65	41%
White	12,640	80%	8,216	65%	4,424	35%
Hispanic	1,580	10%	932	59%	648	41%

Data 2019 Point-in-Time Homeless Count
Source:

Homelessness by Shelter Type and by Race and Ethnicity

Population	Estimated Number of People experiencing Homelessness		
	Emergency	Transitional Housing	Total
Total	3,748	1,986	15,876
Black or African American	333	128	896
White	2,861	1,647	12,839

Population	Estimated Number of People experiencing Homelessness			
	35	11	36	82
Asian	35	11	36	82
American Indian or Alaska Native	171	88	518	777
Native Hawaiian/Pacific Islander	57	21	117	195
Multiple Races	291	91	705	1,087
Hispanic or Latino	394	264	909	1,567

Data Continuums of Care (CoCs)
Source:

Describe the Nature and Extent of Unsheltered and Sheltered Homelessness.

Over 10,000 individuals, or 64 percent of all Oregonian’s experiencing homelessness, were unsheltered. Of the total number individuals in families living with children, 61 percent were unsheltered. Only 1,576 families with children and children living alone were sheltered on the night of the count in 2019. The unsheltered rate among veterans was similarly high (58% or 828 individuals).

Among racial and ethnic groups living in homelessness, the unsheltered rate was highest among those who identified as Native American (66% or 521 individuals) and those who identified as White (65% or 8,216 individuals). The lowest unsheltered rate was among those who identified as Asian (45% or 71 individuals). Nearly half of individuals identifying as Black or African American were unsheltered (465 individuals). Among individuals living in homelessness who identified as either Native Hawaiian/Pacific Islander or Hispanic, 59 percent were unsheltered, a total of 93 and 932 individuals respectively.

Of the 1,439 veterans living in homelessness, 58 percent or 828 individuals were unsheltered during the January 2019 PIT count.

Discussion:

The number of individuals experiencing homelessness is on the rise, more than 13 percent since 2017, and the majority (64%) of persons experiencing homelessness are unsheltered. The primary nighttime residence of these unsheltered persons is a public place not meant for human habitation including but not limited to: street or sidewalk, vehicle, park, abandoned

building, garage, bus/train station, under a bridge or overpass, the woods or outdoor camp. One in three individuals experiencing homelessness in Oregon are chronically homeless.

Stakeholders representing organizations that provide services to residents experiencing homelessness or who are at-risk of homelessness responded to a series of survey questions regarding the most impactful types of housing or services needed and insight into the populations that are disproportionately more likely to experience or be at-risk of homelessness.

OHCS used one data set for the first two columns - *Estimate the # of persons experiencing homelessness on a given night* (displayed above) and all other columns in the HUD database. The first two columns were filled out using the 2019 PIT Count. The remaining columns were extrapolated from the COC System Performance Data Measurements provided by HUD. No information on HIV Homeless needs could be derived beyond the estimates for a given night.

Most impactful resources. Increasing the affordable housing stock, emergency shelter beds, mental health resources, permanently supportive housing units, and emergency rent assistance are the five activities stakeholders believe would have the greatest impact on persons experiencing homelessness or those at risk of homelessness in Oregon's non-entitlement areas.

Where should housing funds be directed to have the greatest impact on persons experiencing homelessness or at-risk of homelessness in your community? (Top 20 responses)

Most Impactful Type of Housing or Service	# of Responses
Additional affordable housing stock	36
Emergency shelter beds	35
Mental health services	35
Permanently supportive housing units	34
Emergency rent assistance	33
Transitional housing units (up to two years tenancy)	31
Deposit assistance (first and last month, security, pet)	30
Financial assistance for rental application fees, background checks	30
Case management/housing navigator	30
Financial assistance in overcoming barriers to tenancy (e.g., debts owed)	29
Finding housing providers who will forgive/accept past convictions	28
Providing housing assistance benefits (e.g. Housing Choice Vouchers, VASH)	26
More flexible dollars to assist folks in overcoming these barriers	25
Addiction services	24
Finding housing providers who will forgive/accept past evictions	23
Emergency utility assistance	22
Transportation vouchers	20
Culturally-specific or responsive services	20
Life skills training/support	20
Street outreach to homeless	20

Note: n=56. Figure presents the top 20 out of 40 potential housing and service options.

Source: Root Policy Research from the 2020 OHCS Housing Stakeholder Survey.

Effect of COVID pandemic on homelessness. Most stakeholders (60%) believe that homelessness has increased in their area due to the COVID pandemic. Nearly two in five stakeholders’ assessment of the populations most at-risk of homelessness changed since the onset of the COVID pandemic. These stakeholders observe that immigrants who are undocumented are especially at-risk of homelessness due to job loss and inability to participate in federal financial relief and other benefits programs. Other populations not previously at-risk of homelessness are those who experience job loss and long-term unemployment resulting from business closures. Several stakeholders mentioned barriers to accessing services resulting

from lack of access to public facilities like libraries to access the Internet or print required forms.

NA-30 Disproportionately Greater Need: Discussion – 91.305 (b)(2)

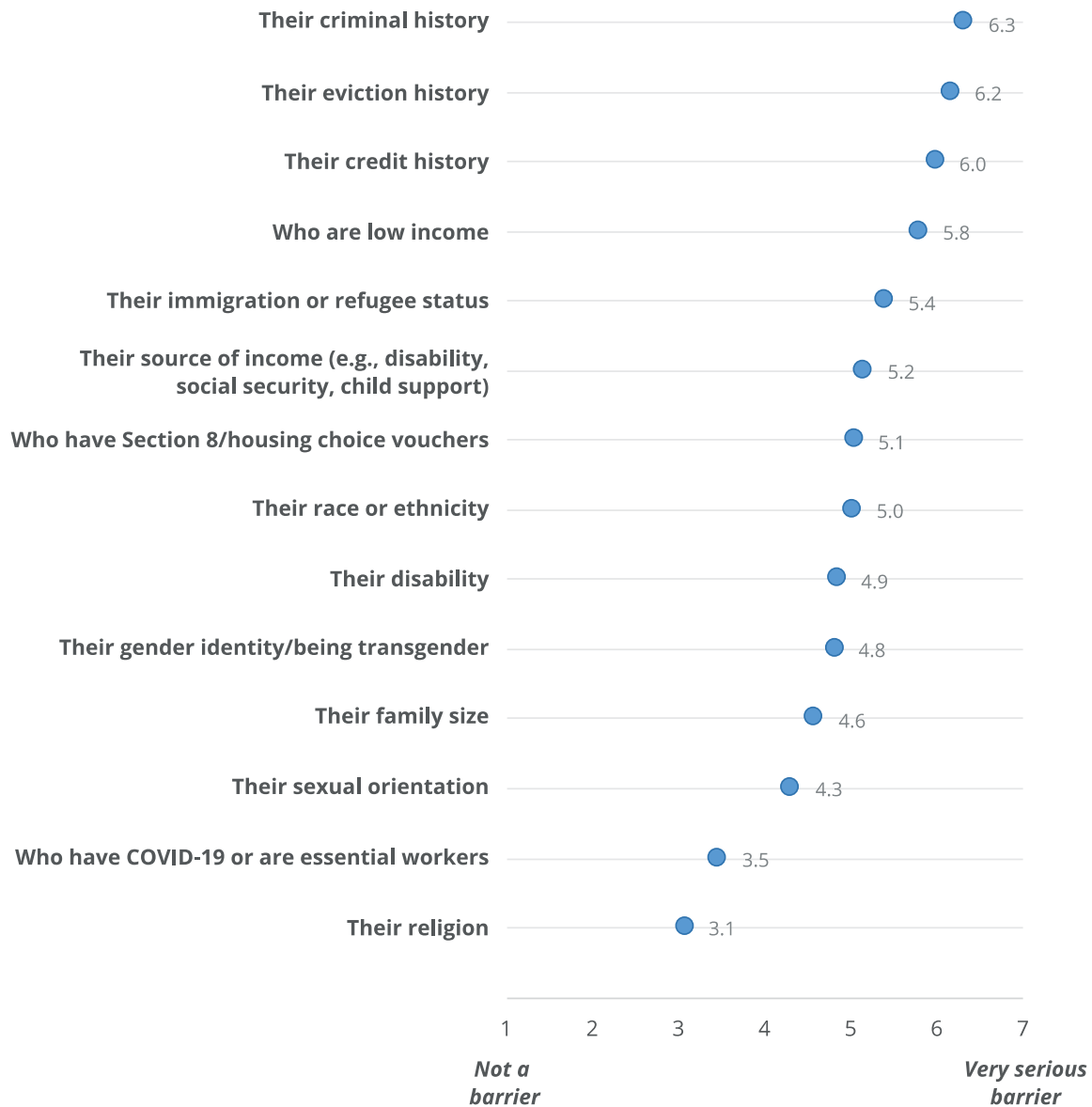
Are there any Income categories in which a racial or ethnic group has disproportionately greater need than the needs of that income category as a whole?

According to the HUD tables in the previous three sections, disproportionate housing needs exist for moderate income Black and African American households, particularly severe housing cost burden. This is also true of Pacific Islander households. In the 2016-2020 Consolidated Plan, extremely low and moderate income Hispanic households had disproportionately greater housing needs; in contrast, the analysis for this plan finds no disproportionate needs for Hispanic households at any income level.

If they have needs not identified above, what are those needs?

To support the development of the 2021 AI, stakeholders rated the seriousness of more than 50 potential barriers to housing choice in Oregon. The figure below presents stakeholders' assessment of the degree to which discrimination against certain populations is a serious barrier to housing choice in their area. As shown, criminal history, eviction history, credit history, and low income, are factors which pose the most serious impediment to housing choice based on housing providers' discernment. With the exception of religion, discrimination against people belonging to classes protected under state and federal fair housing law—national origin, race, disability, gender identity, family size, and sexual orientation—are, on average, considered somewhat serious barriers, with religion being not at all a factor. A history of COVID exposure or increased likelihood of COVID exposure based on employment as an essential worker is also not considered a serious barrier to housing choice.

Seriousness of Potential Housing Choice Barriers Locally—Discrimination Against Certain Populations



Note: Rated on a scale from 1 to 7, where 1=Not a Barrier and 7=Very serious Barrier. n=67.

Source: Root Policy Research from the 2020 OHCS Housing Stakeholder Survey.

Are any of those racial or ethnic groups located in specific areas or neighborhoods in your community?

Housing problems are more likely in areas of concentrated poverty. An analysis of racially/ethnically areas of concentrated poverty in Oregon conducted for the 2021 AI found seven census tracts in the state with both concentrated poverty (3x the county rate) and racial

and ethnic concentrations (20% for non-metro areas). Of these, four are located in the Portland MSA. Others are in communities with a college/university presence and one is adjacent to the Warm Springs Reservation.

Characteristics of Racially and Ethnically Concentrated Areas of Poverty (R/ECAPs) are shown in the following table.

- All but two R/ECAP designated Census tracts have high Hispanic resident concentrations (between 39% and 72%);
- The Multnomah County R/ECAPs are located in the city of Portland and have the highest Black or African American resident concentrations;
- The Hillsboro R/ECAP in Washington County has a relatively high rate of single mother households with children under the age of 18 (31%) compared to other R/ECAPs in the state.
- The R/ECAP Census tract in Medford has a high proportion of individuals with disabilities (23%) as does one of the R/ECAPs in Portland (42%).

Racially/Ethnically Concentrated Areas of Poverty Census Tract Characteristics

	Total Population	People of Color	Hispanic	Black	Families with Children		Persons with Disabilities	LEP
	<i>Num.</i>	<i>%</i>	<i>%</i>	<i>%</i>	<i>Married</i>	<i>Single Mother</i>	<i>%</i>	<i>%</i>
Clackamas County								
Census Tract 9800	75	67%	51%	0%	0%	0%	0%	15%
Jackson County								
Census Tract 1	1,991	45%	39%	1%	10%	19%	23%	10%
Lane County								
Census Tract 38	8,687	29%	9%	2%	1%	3%	9%	5%
Multnomah County								
Census Tract 74	4,236	59%	31%	18%	18%	16%	13%	14%
Census Tract 106	3,144	26%	8%	9%	1%	0%	42%	7%
Washington County								
Census Tract 320.05	4,875	54%	44%	1%	14%	12%	9%	13%
Census Tract 324.09	5,366	75%	72%	1%	26%	31%	11%	37%

Data 2018 5 year ACS 5 year estimates

Source:

NA-45 Non-Homeless Special Needs Assessment – 91.305 (b,d)

Introduction

This section describes the housing needs of special needs populations in Oregon, drawing from the latest data provided by state and national sources on the numbers and needs of special populations.

Describe the characteristics of special needs populations in your community:

Elderly and Frail Elderly

An estimated 908,000 people—18 percent of Oregon’s residents—are over the age of 65. The Population Research Center forecasts that the proportion of older residents will continue to grow until 2035 when it will reach 1.1 million residents (21%), after which growth will plateau.

A total of 60,000 residents statewide are considered “frail elderly,” defined by HUD as an elderly person who requires assistance with three or more activities of daily living, such as bathing, walking, and performing light housework. Older adults have the highest likelihood of having a disability (34%) of any of the state’s age cohorts.

Oregon’s residents ages 65 and older are a greater proportion of the population in more rural, less populated regions including the South Coast, North Coast Southern Oregon, and South Central/Southeast Oregon regions. In each of these regions, senior households exceed 38 percent of all households. The South Coast region of Oregon contains the highest proportion of seniors (44% of all households) and, of those, households, 41 percent live alone. The Portland MSA region, by contrast, has the lowest proportion of senior households (26%); however, seniors living in Portland are comparably likely to be living alone (39%).

Persons with Disabilities

Statewide, nearly 600,000 residents (14%) have a disability. Nearly one-third (31%) or 39,000 working age civilian veterans has a service-connected disability.

Disability by age. The figure below presents the number of Oregon residents by age and type of disability.

- While the overall rate of disability is much lower among children under 18, nearly 42,000 children and youth have a disability. Cognitive disabilities are most prevalent in this age cohort.
- Roughly 295,000 working age adults have a disability, and cognitive and ambulatory disabilities are the most prevalent.

- Not surprisingly, disability is more common among seniors. Among the senior population, ambulatory, hearing and independent living disabilities are the most common.

Number of Persons with Disabilities by Age

State of Oregon	No. of Residents	% of Residents
Total Residents with Disabilities	581,461	14%
Residents Under 18 Years	41,692	5%
Hearing	4,613	1%
Vision	6,704	1%
Cognitive	30,362	5%
Ambulatory	4,765	1%
Self Care	6,683	1%
Residents 18 to 64	295,114	12%
Hearing	70,427	3%
Vision	48,603	2%
Cognitive	142,599	6%
Ambulatory	122,807	5%
Self Care	45,422	2%
Independent Living	108,497	4%
Residents Over 65	244,655	34%
Hearing	117,226	16%
Vision	41,426	6%
Cognitive	58,836	8%
Ambulatory	145,673	20%
Self Care	49,495	7%
Independent Living	94,248	13%

Data Source: 2014-2018 ACS, 1 year estimates

Disability by race and ethnicity. As reported in Cornell University’s 2018 Disability Status Report for Oregon, the prevalence of disability for working age adults is 15 percent among Native American residents, 12 percent among Black and African American residents, 12 percent among White residents, 8 percent of persons of Hispanic descent, and 6 percent among Asian residents. Compared to the state average prevalence of disability among working age adults (12%), Native Americans experience a higher prevalence of disability and Asian residents and Hispanic residents lower rates.

Employment and education of people with disabilities. In 2018, 41 percent of working age adults with disabilities were employed and 8 percent were actively seeking employment.

Among working age adults with disabilities, 15 percent have a bachelor's degree or more, while 39 percent have some college or an associate degree and 30 percent completed their education with a high school diploma or GED.

Disability, income, and poverty. The median earnings of persons with disabilities working full time in Oregon was \$40,500, about \$10,000 per year lower than similarly aged Oregonians without a disability. Median household income of households that include a working age member with a disability was \$50,100 in 2018, about \$26,500 less per year than similar households that do not include a working age member with a disability (\$76,600). More than one in four (28%) working age Oregonians with disabilities lives in poverty, compared to 10 percent without a disability. Slightly less than one in five (17%) receive Supplemental Security Income. In 2020, the federal maximum benefit for an individual on SSI is \$783 and \$1,175 for a couple.

People with Mental Illness

Oregon's 2018 State Health Assessment estimated that one in five Oregon adults has a mental health condition. The 2019 Analysis of Oregon's Publicly Funded Substance Abuse Treatment System by the Oregon Criminal Justice Commission (hereafter OCJC study) found that 757,000 individuals in Oregon experience a mental illness and 172,000 experience serious mental illness. According to the Substance Abuse and Mental Health Services Administration (SAMHSA) report for the state of Oregon, between 2013 and 2017 the annual average prevalence of serious mental illness among adults aged 18 or older was 5 percent or 166,000 individuals. This is above the national rate for the same time period (4%).

People with Substance Use Disorders

The average annual rate of substance use disorders among Oregonians 12 years of age and older between 2015 and 2017 was 11 percent, affecting 367,000 residents. This is moderately higher than the national rate of 8 percent.

The average rate of alcohol use disorders between 2014 to 2017 was 8 percent, affecting 268,000 residents; and the rate for illicit drug use disorders was 4 percent, affecting 143,000 residents. There is likely some duplication in these numbers due to multiple-use disorders.

Intimate Partner Violence Survivors

Nearly 178,000 residents 18 and older in Oregon have experienced some type of domestic violence, dating violence, sexual assault and/or stalking by an intimate partner in the previous year.

In 2018, more than 128,000 calls for help were placed to Oregon's Domestic Violence/Sexual Assault (DVSA) crisis lines, as detailed in the 2019 study "Striving to Meet the Need: Summary of Services Provided by Sexual and Domestic Violence Programs in Oregon."

Justice-Involved Residents

Adults in state custody. In November 2020, 13,149 adults were in the custody of the Oregon Department of Corrections. Among these, 5,763 or 44 percent will be released in the next two years. The median length of stay, excluding those serving life or death sentences or with no parole, was just over two years

- Most adults in custody are White (9,505 or 72%), followed by persons of Hispanic descent (1,771 or 13%), Black or African American adults (1,227 or 9%), Native American adults (419 or 3%), and 186 or 1 percent identify as Asian. Compared to Oregon's population, Black or African American adults and Native American adults are over-represented among adults in state custody.
- One in four adults in custody are between the ages of 18 and 30; the greatest proportion (43% or 5,704) are between the ages of 31 and 45.
- More than half (53% or 6,934) have substance dependence or addiction.
- Nearly 8,000 or 60 percent experience mental health difficulties and would benefit from some form of treatment. More than one in five (3,384 or 26%) have severe mental health problems or require the highest level of treatment.

Adults recently released from state custody. According to the Oregon Department of Corrections, an average of 441 adults were released from custody each month during 2018, for a total of more than 5,300 adults. Many face substantial barriers to finding housing and employment. Stakeholders surveyed for this Consolidated Plan ranked criminal histories as the top barrier to accessing housing in the state due to lack of housing options and discrimination.

Each month most of those released from custody join the 26,280 Oregonians who, in July 2020 were under state supervision (e.g., parole, probation).

PLWHA Populations

The CDC reports that 197.90 of 100,000 Oregon residents live with HIV infection. This translates to 8,293 persons who are HIV positive. A 2017 study by the Oregon Health Authority found that

men in Oregon are 7 times more likely to become infected with HIV than women. The majority of transmission for both men and women is through intimate encounters; one-fifth of infections is from injection drug use. Black/African American and Latinx populations are more likely to be HIV infected. Multnomah County has a disproportionate proportion of HIV/AIDS residents: the county is home to 19% of the state’s population and 47% of people living with HIV. Since 2008, HIV/AIDS cases have been declining in Oregon, especially for Black/African American residents.

What are the housing and supportive service needs of these populations and how are these needs determined?

Among all special needs populations considered, the need for affordable housing is a consistent theme across all groups.

Elderly and Frail Elderly Housing and Supportive Service Needs

The table below, updated from the last five-year plan, shows cost burden for low income seniors by tenure and severity of burden. Cost burden is very high for extremely low income elderly households (60%) and significantly higher than for elderly households overall (17%).

Low Income Senior Households with Moderate or Severe Cost Burden, Oregon

Moderate Cost Burden (< 30, =< 50%)						
Income Level	Renter	Percent	Owner	Percent	Total	Percent
0-30% AMI	2,925	11%	4,925	19%	7,850	15%
31-50% AMI	9,300	35%	11,755	28%	21,055	31%
51-80% AMI	9,880	41%	13,630	20%	23,510	26%
All	26,905	25%	54,735	16%	81,640	18%
Severe Cost Burden (>50%)						
Income Level	Renter	Percent	Owner	Percent	Total	Percent
0-30% AMI	15,500	61%	15,205	60%	30,705	60%
31-50% AMI	11,335	42%	12,465	30%	23,800	35%
51-80% AMI	4,765	20%	9,830	14%	14,595	16%
All	33,850	31%	43,100	12%	76,950	17%

Data 2011-2015 CHAS

Source:

A focus group with frail elderly to support this Plan identified accessibility improvements as a priority need, noting that facilitating aging in place is less costly than the alternatives: *“The average cost is 35K if someone falls and goes to the hospital. Wouldn’t it be cheaper to build safer houses in the first place?”*

PLWHA Populations

Persons with HIV are significantly more vulnerable to becoming homeless during their lifetime, according to HUD. A recent CDC HIV Surveillance Special Report found that 10% of persons with HIV/AIDS are homeless, with 3% experiencing evictions. Addressing the housing needs of persons with HIV/AIDS not only helps to reduce homelessness, housing stability also produces better health outcomes, reduces community transmission, and reduces health care costs from emergency care treatment. The primary challenges of HIV/AIDS residents is finding affordable housing (especially if they have a reduced ability to work full time) near health care facilities and services.

Housing and Supportive Service Needs of People with Physical and Developmental Disabilities

According to the Oregon Affordable Housing Inventory (OAH), last updated in January 2020, there were a more than 63,000 units of affordable housing throughout the state. Seven percent of the total restricted units were target to residents with physical disabilities (4,727 units) and 2 percent were targeted to residents with developmental disabilities (1,328 units).

According to report regarding Oregon Department of Health Services prepared by the Office of Reporting, Research, Analytics and Implementation (ORRAI) and the Office of Forecasting, Research and Analysis (DHS|OHA Shared Service) from 2018, nearly 40,000 Oregon residents used Aging and People with Disabilities (APD) services in 2017.

The national Center on Budget and Policy Priorities (CBPP) estimates federal rental assistance use—a proxy for need. CBPP estimates that federal rental assistance helps 34,600 Oregon residents with disabilities live independently. These residents represent 30 percent of all assisted residents. Federal assistance fails to meet demand, however, and an estimated 64,400 persons with disabilities are rent cost burdened due to lack of support. A focus group with residents with disabilities conducted to inform this plan found that even with subsidies, persons with disabilities have a hard time finding housing that fits their needs and utilizing their Housing Choice Vouchers. Lengthening the time available to find rental units with a voucher would be helpful.

For households with disabilities who cannot work, federal disability payments are their primary source of income. These payments equate to below-poverty living standards, making housing subsidies critical for residents with disabilities: One participant in a focus group with residents with disabilities shared that her rent was higher than her disability income payment, and she would be homeless without her housing voucher.

Housing and Supportive Service Needs of People with Mental Illness

Housing and supportive service needs vary with the degree of seriousness and persistence of mental illness, presence of dual-diagnosis (e.g., substance use disorders), trauma, and recent or current homelessness. As detailed more in MA-35, Oregon has committed to improving mental health services and the supply of supportive housing for adults with SPMI, with a focus on person-centered services like case management, Assertive Community Treatment (ACT), peer supports, supported employment, and living skills training.

Although the prevalence of serious mental illness in Oregon adults is approximately 5 percent, 20 percent of persons experiencing homelessness are severely mentally ill. That persons with mental illness comprise such a disproportionate share of those who are also homeless is indicative of the significant housing and supportive service needs of the SMPI population in Oregon. One of the most urgent housing needs identified by stakeholders is for housing units affordable to extremely low income households. The majority of stakeholders identify persons with SPMI as having disproportionately high housing needs relative to all low and moderate income populations.

Stakeholder survey respondents who identified supportive services as an urgent activity needed to achieve or maintain housing stability described the types of services most needed. Stakeholders emphasized mental health services, alcohol and drug rehabilitation services, and behavioral health services—all necessary, in their view, to maintain housing. While necessary, stakeholders consistently identified a lack of capacity for mental health services in their communities.

Housing and Supportive Services Needs of People with Substance Use Disorders

According to the Oregon Affordable Housing Inventory (OAHI), last updated in January 2020, there were a more than 63,000 units of affordable housing throughout the state. Three percent of the total restricted units were targeted to residents with substance use disorders (1,859 units).

As described above, this population is considered at high risk of homelessness and many require supportive services, including alcohol and drug treatment and mental health services, to maintain housing. Relative to all low to moderate income households, more than two-thirds of stakeholders identify persons with SUDs as being disproportionately at risk of homelessness.

About 11 percent or 367,000 residents of Oregon are estimated to have substance use disorders. The rate is higher than the national rate of 8 percent. In Oregon, the rate of alcohol use disorders from 2014 to 2017 was 8% or 268,000, and the rate for illicit drug use disorders was 4 percent or 143,000 residents.

There is insufficient capacity statewide to treat Oregonians with SUDs. The OCJC study found that 311,000 Oregonians (9%) needed but did not receive treatment for substance use disorders. The study concluded that “Oregon now ranks among the most challenged states in the nation for substance abuse and mental health problems, while at the same time ranking among the worst states for access to care.” (p.14) Statewide, there are 13 licensed detox facilities with a total of 201 beds, and 64 licensed substance abuse treatment programs with 1,427 beds.

Residents participating in a focus group to support this plan agreed that resources for people in recovery after they leave treatment are needed.

Oregon Detoxification Capacity

Table 2.3.1. Statewide Detoxification Capacity (March 2019)

County	Total Beds	Population	Population Per Bed
Washington	12	588,957	49,080
Jackson	12	217,479	18,123
Deschutes	12	186,875	15,573
Marion	32	341,286	10,665
Multnomah	76	807,555	10,626
Douglas	11	109,405	9,946
Umatilla	14	76,985	5,499
Klamath	16	66,935	4,183
Lincoln	16	48,920	3,058
Total	201		

Note:

Figure is reproduced directly from the OCJC report.

Source:

Oregon Criminal Justice Commission, “Analysis of Oregon’s Publicly Funded Substance Abuse Treatment System: Report and Findings for Senate Bill 1041”, Table 2.3.1, p. 16.

Oregon’s Residential Treatment Capacity

Table 2.3.2. Oregon’s Residential Treatment Capacity (March 2019)

County	Men	Women	Male Child	Female Child	Total Beds	Population	Population Per Bed
Clackamas	6	5			11	412,672	37,516
Washington	14	12	13	13	52	588,957	11,326
Deschutes	9	9			18	186,875	10,382
Marion	21	13			34	341,286	10,038
Josephine	5	8			13	86,352	6,642
Columbia	8	8			16	51,782	3,236
Douglas	8	24		15	47	109,405	2,328
Jackson	24	73			97	217,479	2,242
Benton		15	15	16	46	90,951	1,977
Lane	87	115			202	374,748	1,855
Jefferson	13				13	23,758	1,828
Multnomah	197	202	52	12	463	807,555	1,744
Clatsop	16	11			27	39,182	1,451
Umatilla	51	15			66	76,985	1,166
Yamhill	47	48			95	105,722	1,113
Klamath	32	33			65	66,935	1,030
Crook	12	12			24	23,123	963
Malheur	48	12			60	30,480	508
Baker	24	54			78	16,054	206
Total	622	669	80	56	1,427		

Note: Figure is reproduced directly from the OCJC report.

Source: Oregon Criminal Justice Commission, “Analysis of Oregon’s Publicly Funded Substance Abuse Treatment System: Report and Findings for Senate Bill 1041”, Table 2.3.1, p. 17.

Housing and Supportive Services for Survivors of Intimate Partner Violence

Each year, approximately 178,000 Oregonians experience intimate partner violence. In the most severe cases, these victims must leave their homes. Housing needs range from immediate emergency shelter to transitional housing paired with supportive services, to vouchers or other rent subsidies, to housing counseling and home search assistance.

- 4,200 residents (2%) who are victims of domestic violence in Oregon require housing services each year.
- According to the Oregon Coalition Against Domestic and Sexual Violence’s 2019 Striving to Meet the Need annual report, there were more than 8,000 unmet requests for shelter by survivors of intimate partner violence.
- More than 2,000 adults, more than 150 teens, and 1,400 children received emergency shelter in 2018, representing more than 110,000 shelter nights.
- One in 20 (5%) of those receiving emergency shelter have limited English proficiency (LEP).

- One in 10 emergency shelter residents are of Hispanic descent, more than 6 percent are Black or African American, and more than 6 percent are American Indian/Alaskan Native. Nearly 71 percent are White.
- While the majority of emergency shelter residents are women and their children, 10 transgender Oregonians and more than 80 men received emergency shelter services.

One-third of OHCS stakeholder survey respondents identify domestic violence survivors as having disproportionately high housing needs relative to all low and moderate-income populations overall in their service area. Residents participating in a focus group for this plan emphasized the need for trauma-informed care.

Housing and Supportive Services for Justice-Involved Residents

As discussed above, according to the Oregon Department of Corrections, in 2018, there were an average of 441 adults in custody released each month—joining the 26,280 Oregonians who are under state supervision—and many face substantial barriers to finding housing and employment. There is a significant need to address this gap.

Housing options for people released from incarceration is further limited for those with multiple chronic conditions including mental health, addictions, and communicable diseases such as HIV and/or chronic viral hepatitis is extremely limited throughout the state. Depending on the type of conviction, elderly formerly incarcerated people are nearly impossible to place in housing. This lack of housing creates a crisis for multiple care organizations not the least of which are hospital emergency departments and homeless shelters.

According to the Oregon Affordable Housing Inventory (OAH), last updated in January 2020, only one percent of the total restricted units were targeted to residents who have been justice involved (395 units).

When asked about populations with disproportionate housing needs or increased risk of homelessness, the greatest proportions of stakeholders (64%) consistently identified residents with criminal histories. One stakeholder suggested, *“Having a social worker inside jails and prisons to ensure that people have housing arranged for when they get released. Incentivizing more landlords to accept tenants with criminal history.”* These activities—connecting inmates to housing prior to release and expanding the number of felon-friendly landlords—address two of the most persistent housing-only issues. In many cases, having a criminal history is not the only impediment; this population experiences high rates of mental illness and substance use disorders which further exacerbate housing difficulties.

Housing and Supportive Services for People with HIV/AIDS

According to the Oregon Health Authority, as of December 31, 2019, there were 7,707 people living with HIV/AIDS in Oregon. Between 2014 and 2018, an average of 225 new cases were diagnosed each year. From 1981 to 2018, a total of 10,556 Oregonians were diagnosed with HIV infections.

Overall rates of HIV infections in Oregon are significantly higher among male residents (88%), and those age 50 and older (53%).

New infection rates are four times higher for Black or African American residents (702.7 cases per 100,000 residents) than White residents (176.5 cases per 100,000 residents). Among Hispanic residents the rate was 193.4 cases per 100,000 residents; among Native American residents, 160.6 cases; among Native Hawaiian/Pacific Islanders, 142.4 cases; among Asian residents, a much lower 86.0.

Cases are concentrated in urban areas: 47 percent of the state's individuals with HIV/AIDS live in Multnomah County (v. 20% of the state's population).

According to the Oregon Health Authority, as of December 31, 2019, there were 7,707 people living with HIV in Oregon. Between 2014 and 2018, an average of 225 new cases were diagnosed each year.

The Center for Disease Control's "Behavioral and Clinical Characteristics of Persons with Diagnosed HIV Infection, Medical Monitoring Project 2018 Cycle" estimates that nationally, 11 percent of persons with HIV who need shelter or housing services have unmet shelter or housing needs. Applying this rate to Oregon's population of individuals with HIV, approximately 848 individuals may have an unmet need for housing or shelter services.

HOPWA

Current HOPWA formula use:	
Cumulative cases of AIDS reported	10,566
Area incidence of AIDS	
Number of new cases prior year (3 years of data)	225
Rate per population	
Rate per population (3 years of data)	
Current HIV surveillance data:	
Number of Persons living with HIC (PLWH)	7,707
Area Prevalence (PLWH per population)	1.8
Number of new HIV cases reported last year	225

HOPWA Data

Data Oregon Health Authority: HIV Infections in Oregon, 1981-2018 diagnosis. 2014 to
Source: 2018 new diagnosis, 2018 ACS 1 year Population Estimates (1,000 residents).

HIV Housing Need (HOPWA Grantees Only)

Type of HOPWA Assistance	Estimates of Unmet Need
Tenant based rental assistance	60
Short-term Rent, Mortgage, and Utility	0
Facility Based Housing (Permanent, short-term or transitional)	0

HIV Housing Need

Data HOPWA CAPER, based on households on wait lists.
Source:

Discuss the size and characteristics of the population with HIV/AIDS and their families within the Eligible Metropolitan Statistical Area:

N/A; state needs are discussed above.

NA-50 Non-Housing Community Development Needs - 91.315 (f)

Describe the jurisdiction's need for Public Facilities:

Oregon's CDBG program strives to stimulate economic opportunity through a host of community development programs by improving infrastructure, assisting microenterprises, providing housing rehabilitation, and constructing or rehabilitating community facilities. The primary barriers to addressing the need for public facilities is funding and a lack of local capacity for project development, implementation, and grant administration. Many of rural Oregon's small communities have few employees and rely on volunteers to spearhead community projects. OBDD-IFA continues to dedicate resources to build local capacity, including funding regional development officers.

Participants in the OBDD-IFA stakeholder survey consider water and sewer infrastructure to be one of the greatest unmet community development needs in their service area, followed by infrastructure for Internet access to a community or parts of a community, downtown/Main Street revitalization, community facilities/capacity for mental health services, and microenterprise business assistance.

Among different types of public facilities identified among the greatest unmet community development needs, community facilities and expanded capacity for mental health services was one of the top three needs, selected by one in three stakeholders. Downtown/Main Street revitalization, community facilities or capacity for Head Start or Early Childhood Education programs and community facilities or capacity for food bank/food provision are also considered unmet public facility needs.

What are the top five greatest unmet community development needs in your service area?

Community Development Activity	% of Responses
Water and sewer infrastructure	45%
Infrastructure for Internet access to a community or parts of a community	40%
Downtown/Main Street revitalization	37%
Community facilities/capacity for mental health services	36%
Microenterprise business assistance (formation, bookkeeping, etc)	25%
Sidewalk improvements	22%
Infrastructure for Internet access to connect existing fiber/cable to homes or buildings	21%
Job training/skill development	21%
Lack of/limited capacity of nonprofits to provide needed public services	18%
Hotspots for wireless access at community locations	12%
Stormwater infrastructure	12%
Adapting existing facilities to meet CDC, state, or local public health guidelines	12%
Public transit	10%
Capacity building and technical assistance	10%
Community centers (general)	9%
Community facilities/capacity for food bank/food provision	7%
Community facilities/capacity for Head Start or Early Childhood Education programs	7%
Programs to increase digital literacy (e.g., basic Internet skills)	7%
Removal of structural barriers to achieve ADA accessibility	7%
Flood drainage infrastructure	7%
Other type of community facility	6%
Internet-capable devices (e.g., smartphones, tablets) for residents in need	6%
Historic preservation or restoration	6%
Community facilities/capacity for domestic violence shelter	4%
Community facilities/capacity for senior centers	4%
Community facilities/ capacity for libraries	3%
Community facilities/ capacity for fire stations	3%

Note: n=67.

Source: Root Policy Research from the 2020 OBDD-IFA Community Development Stakeholder Survey.

When stakeholders prioritized the most urgent unmet community development needs, they assigned the highest priority to:

- Infrastructure for Internet access to a community or parts of a community;

- Water and sewer infrastructure;
- Community facilities/capacity for mental health services;
- Downtown/Main Street revitalization; and
- Infrastructure for Internet access to connect existing fiber/cable to homes or buildings.

When tasked with prioritizing the unmet needs shown in the preceding figure, community facilities/capacity for mental health services ranked third and Downtown/Main Street revitalization fourth.

In roundtable discussions, access to quality, affordable childcare was consistently raised as an urgent need. Many communities lost childcare slots due to COVID-related closures or capacity restrictions, exacerbating an existing unmet need.

Priority Urgent Community Development Needs by Rank Score

Community Development Needs	Weighted Rank Score
Infrastructure for Internet access to a community or parts of a community	88
Water and sewer infrastructure	82
Community facilities/capacity for mental health services	59
Downtown/Main Street revitalization	50
Infrastructure for Internet access to connect existing fiber/cable to homes or buildir	43
Microenterprise business assistance (formation, bookkeeping, etc)	38
Lack of/limited capacity of nonprofits to provide needed public services	37
Sidewalk improvements	32
Adapting existing facilities to meet CDC, state or local public health guidelines	21
Job training/skill development	20
Stormwater infrastructure	19
Community facilities/capacity for Head Start or Early Childhood Education programs	19
Community facilities/capacity for food bank/food provision	17
Community centers (general)	15
Capacity building and technical assistance	13
Public transit	13
Hotspots for wireless access at community locations	12
Community facilities/capacity for domestic violence shelter	11
Flood drainage infrastructure	9
Internet-capable devices (e.g., smartphones, tablets) for residents in need	8
Programs to increase digital literacy (e.g., basic Internet skills)	7
Removal of structural barriers to achieve ADA accessibility	6
Historic preservation or restoration	4
Other type of community facility	4
Community facilities/capacity for libraries	3
Community facilities/capacity for senior centers	3
Community facilities/capacity for fire stations	2

Note: Higher Rank Scores indicate a greater number of respondents ranking an activity overall and ranking an activity highly. Rank Score = (number of #1 rank * 5) + (number of #2 rank * 4) + (number of #3 rank * 3) + (number of #4 rank * 2) + (number of #5 rank * 1). Highest possible score =260. n=52.

Source: Root Policy Research from the 2020 OBDD-IFA Community Development Stakeholder Survey.

How were these needs determined?

Needs for community facilities were determined through consultation with stakeholders serving Oregon's non-entitlement areas and informed by grant requests during the 2016-2020 Consolidated Plan period.

Describe the jurisdiction's need for Public Improvements:

Oregon is in dire need of basic assistance for infrastructure improvements to address major deficiencies in the existing water and sewer systems. As Identified in the 2019 Report Card of America's Infrastructure for the State of Oregon prepared by the American Society of Civil Engineers, Oregon's infrastructure received a "C-" grade, meaning that the overall condition of the state's infrastructure is between mediocre (C) and at risk (D). The grades among the different infrastructure sectors are as follows: bridges (C), dams (D+), levees (D+), ports (C-), drinking water (C-), rail (C), energy (D+), roads (C+), inland waterways (C-), and wastewater (D) are between mediocre and at risk.

In a 2016 survey of capital project needs for the next 20 years, the League of Oregon Cities found that 107 Oregon cities with populations less than 50,000 report nearly \$5 billion in total infrastructure need. This includes \$2.4 billion in water infrastructure needs and \$2.6 billion in transportation infrastructure needs.

As discussed above, infrastructure needs—for Internet access to a community or parts of a community, water and sewer infrastructure, and infrastructure for Internet access to connect existing fiber/cable to homes or businesses, sidewalk improvements, and stormwater infrastructure—are among the priority urgent infrastructure needs identified by stakeholders. While access to broadband Internet has long been a challenge for rural communities, the COVID pandemic heightened stakeholders' awareness of disparities in access by low and moderate income households, families with children, and local businesses. Stakeholders also see water and sewer infrastructure as a priority community development need, and to a lesser extent sidewalk improvements and stormwater infrastructure.

OBDD-IFA's 2019 Infrastructure Summit explored opportunities to align the state's economic development strategy with investments in critical infrastructure. In their study, "Oregon's Infrastructure Opportunities: Funding, Economic Development, and Resilience," researchers at the University of Oregon's Institute for Policy Research and Engagement built on the findings from the studies discussed above and conducted a series of in-depth interviews with local leaders and stakeholders to understand the connections between infrastructure, resilience, and economic development. Key findings align with the results of engagement conducted for the Consolidated Plan—current resources are insufficient to meet the state's infrastructure needs; small communities lack the capacity to successfully apply for and manage infrastructure

projects; and economic development is hindered by inadequate infrastructure. The authors urge the state to “leverage historically high global capital reserves and historically low government borrowing costs to make large-scale investments in resilient infrastructure systems. In addition, state and local leaders should ensure the efficient and timely delivery of infrastructure to stimulate economic recovery from COVID and the 2020 wildfire season and improve Oregon’s long-term economic growth prospects.”

How were these needs determined?

OBDD-IFA, Oregon’s state business development agency, identified infrastructure investments to promote business growth, specifically throughout rural Oregon, as a key economic strategy for the state in its 2019 Annual Report. Eighty-three percent of all infrastructure and community investment dollars from fiscal year 2019 went into rural Oregon. OBDD-IFA’s Strategic Plan 2018-2022 identified the alignment of infrastructure investment to its long term growth, especially in rural Oregon. This infrastructure included broadband internet access as well as land and water infrastructure projects.

In the OBDD-IFA stakeholder survey, participants identified and prioritized unmet community development needs. Survey findings are consistent with findings from the stakeholder roundtable discussions.

Describe the jurisdiction’s need for Public Services:

Oregon has a significant need for public services eligible for CDBG funding such as mental health care, childcare, and other supportive services. Many of these services have other private, state, and federal funding resources but current resources do not meet demand, particularly demand for supportive services to help residents achieve and maintain housing stability. As discussed previously, stakeholders emphasized the need for mental health services, alcohol and drug rehabilitation services, and behavioral health services—all necessary, in their view, to maintain housing. Supportive services not directly addressing serious and persistent mental illness (SPMI) or substance use disorders (SUDs) focused on life skills for very low income residents, such as budgeting, parenting skills, and navigating benefit programs; support gaining and maintaining employment; legal services; and child care.

How were these needs determined?

These needs were based on the studies referenced above—the 2019 Report Card on America’s Infrastructure for the State of Oregon, the infrastructure survey conducted by the Oregon League of Cities, “Oregon’s Infrastructure Opportunities: Funding, Economic Development, and Resilience”—findings from the 2019 Infrastructure Summit, the 2020 OBDD-IFA’s 2019 Annual report and staff interviews, the stakeholder roundtables conducted with community and

economic development staff from cities, counties, and nonprofits across the state, findings from resident focus groups, findings from the OHCS stakeholder survey, and findings from the OBDD-IFA stakeholder survey. In the OBDD-IFA stakeholder survey, participants identified and prioritized unmet community development needs. In the OHCS stakeholder survey, participants identified and prioritized unmet housing and supportive service needs.

Housing Market Analysis

MA-05 Overview

Housing Market Analysis Overview:

This section describes significant characteristics of the housing market in Oregon including a review of supply and demand as well as the cost and condition of the housing stock. The section concludes with a discussion of high priority needs.

Supply and Demand

According to “Breaking New Ground”—Oregon’s Statewide Housing Plan for 2019-2023 (also referred to as the SWHP)—there is a significant gap in the demand for affordable units and the supply of affordable units for households making less than 50 percent of median family income (AMI). Specifically:

- More than 85,000 units affordable to extremely low income households (making less than 30% AMI) are needed to meet demand; and
- More than 26,000 units affordable to moderate income households, making 50 percent to 80 percent AMI are needed to meet demand.

Housing supply is very tight in the state, especially for owned units: According to the Federal Reserve, in 2019, Oregon homeownership vacancy rates were 1.0 percent and rental vacancy rates were 5.1 percent.

Data from the 2019 National Low-Income Housing Coalition’s annual Out of Reach study found that an Oregon worker with a full-time, minimum wage job, would need to work 1.7 jobs to afford a one-bedroom, market rent unit.

Affordability gaps between what minimum wage workers earn and fair market rents is greatest in urban areas. In Clackamas, Columbia, Multnomah, Washington, and Yamhill counties, for example, an hourly wage of \$27.71 per hour would be required to afford a two-bedroom unit.

Community engagement findings are consistent with the gaps analysis from the Statewide Housing Plan. The top housing activities identified by stakeholders to meet urgent needs in their service area are:

- More rental units for extremely low income households (at or below 30% AMI);
- More rental housing for very low income households (60% AMI or less);
- Emergency shelters for people who are homeless and transitional housing for people moving out of homelessness; and

- More rental housing for low to moderate income households (80% AMI or less).

In addition to rental housing affordable to low and moderate income households, stakeholders also identified urgent needs for accessible and affordable housing units for people with disabilities, rent assistance, and more homes affordable for low to moderate income households to buy (60% to 120% AMI).

Cost and Condition of Housing

Statewide, the median home value rose by 40 percent (nearly \$100,000) between 2010 and 2018. Median rent made a similar jump, increasing by nearly \$300 per month—slightly more than 40 percent.

As noted above, stakeholders consistently identify a lack of rental units affordable to low and moderate income households as an urgent need in Oregon. In addition, survey participants and participants in stakeholder roundtables described substandard housing conditions in many rural communities due to aging homes, aging homeowners unable to keep up with maintenance, or poor conditions in manufactured home/trailer parks. Both accessibility modifications for low income homeowners and home repairs were identified as urgent housing needs, but ranked lower on the priority list than expanding the supply of affordable rental housing.

High Priority Housing Needs

Oregon's Statewide Housing Plan for 2019-2023 identifies six priorities: equity and racial justice, homelessness, permanent supportive housing, affordable rental housing, homeownership, and rural communities. These priorities include the following specific housing related goals:

- Increased parity in housing stability and access, including self-sufficiency and homeownership, across racial and ethnic groups by understanding and addressing systemic injustices experienced by these communities.
- Coordinated statewide efforts to prevent and end homelessness, specifically among children and veteran populations.
- Investing in permanent supportive housing to reduce chronic homelessness and reduce housing insecurity.
- Increase rental housing affordability by building more affordable housing units and reducing cost burden by increasing income.
- Increase homeownership among low and moderate income households, including mortgage loan programs, asset building resources, down payment assistance, lower cost homeownership through preservation and improvement of manufactured housing, especially among minority households.

These priorities are consistent with those identified by participants in the OHCS Stakeholder Survey conducted to support development of the 2021-2025 Consolidated Plan.

Once survey respondents identified their five housing activities to address the most urgent housing needs in their area, stakeholders prioritized the activities in a ranking exercise. As shown in the following figure, the five housing activities stakeholders ranked most highly to address their area's most urgent housing needs are:

- More rental units for extremely low income households;
- Emergency shelters for people who are homeless;
- More rental housing for very low income households;
- Transitional housing for people moving out of homelessness; and
- Affordable and accessible housing for people with disabilities.

Highest Priority Housing Activities to Meet Urgent Needs (By Weighted Rank Score)

Housing Activity	Weighted Rank Score
More rental units for extremely low income households	168
Emergency shelters for people who are homeless	165
More rental housing for very low income households	148
Transitional housing for people moving out of homelessness	127
Affordable and accessible housing for people with disabilities	98
Repurpose vacant/underutilized properties into affordable housing	86
More low/mod rental housing	80
Long-term tenant based rental assistance (6+ months)	79
Homes for low/mod ownership	53
Pay COVID rent debts	51
Supportive services	43
Navigators to help locate and qualify for affordable housing/housing assistance	37
Short-term tenant based rental assistance (3-6 months)	27
Accessibility modifications for homeowners	22
Emergency utility assistance	19
Preservation of affordable homeownership in manufactured home communities	18
Pay COVID mortgage debts	16
Repairs for low/moderate income homeowners	15
Accessibility modifications for renters	11
Housing for area workforce	9
Emergency cash assistance for vehicle repairs	8
Search engine/database to locate and qualify for affordable housing/housing assistance	4
Repairs for low/mod renters	3
Lead-based paint abatement	0

Note: Higher Weighted Rank Scores indicate a greater number of respondents ranking an activity overall and ranking an activity highly. Weighted Rank Score = (number of #1 rank * 5) + (number of #2 rank * 4) + (number of #3 rank * 3) + (number of #4 rank * 2) + (number of #5 rank * 1). Highest possible score = 445.

Source: Root Policy Research from the 2020 OHCS Housing Stakeholder Survey.

MA-10 Number of Housing Units – 91.310(a)

Introduction

Single family detached units remain the most common housing type statewide at 63 percent of all units, followed by multifamily units (24%). Manufactured homes—the majority of units in the “mobile homes, boats, RVs, vans, etc.” category—are 8 percent of the state’s housing stock.

As shown in the following tables, the composition of residential property types varies considerably among Oregon’s different regions. Manufactured homes are an important part of the housing stock in rural regions, comprising more than double to statewide proportion. Conversely, multifamily units are more prevalent in the state’s most urban region, the Portland MSA (36% compared to 24% in the state overall).

The vast majority (80%) of owner occupied units are three bedrooms or larger. Renter occupied units are more varied by size: one in four are one-bedroom units, 41 percent are 2 bedrooms, and 29 percent have three bedrooms.

Renters in more rural regions are more likely to live in larger units than those in urban areas. Conversely, homeowners in more rural areas live in units with fewer bedrooms than their urban and suburban counterparts. This is likely due to the limited supply of traditional multifamily buildings in these regions and the larger proportion of owner-occupied manufactured homes.

All residential properties by number of units

Property Type	Number	%
1-unit detached structure	1,038,382	63.32%
1-unit, attached structure	71,317	4.35%
2-4 units	107,181	6.54%
5-19 units	144,681	8.82%
20 or more units	145,723	8.89%
Mobile Home, boat, RV, van, etc.	132,686	8.09%
Total	1,639,970	100.00%

Residential Properties by Unit Number

Data 2018 ACS, 1 year estimates

Source:

Residential properties by number of units by region

Property Type	Central Oregon	Columbia Gorge	North Coast	Northeast Oregon
1-unit detached structure	79,236	16,894	51,532	43,277
1-unit, attached structure	3,483	610	2,177	1,131
2-4 units	7,363	1,367	4,993	3,833
5-19 units	4,444	1,005	3,280	3,086
20 or more units	3,541	934	2,679	1,908
Mobile Home, boat, RV, van, etc.	9,502	3,646	7,862	11,027
Regional Total	107,569	24,456	72,523	64,262

Residential Properties by Unit Number by Region

Data 2014-2018 ACS, 5 year estimates

Source:

Residential properties by Percent of units in region

Property Type	Central Oregon	Columbia Gorge	North Coast	Northeast Oregon
1-unit detached structure	73.7%	69.1%	71.1%	67.3%
1-unit, attached structure	3.2%	2.5%	3.0%	1.8%
2-4 units	6.8%	5.6%	6.9%	6.0%
5-19 units	4.1%	4.1%	4.5%	4.8%
20 or more units	3.3%	3.8%	3.7%	3.0%
Mobile Home, boat, RV, van, etc.	8.8%	14.9%	10.8%	17.2%
Regional Total	100%	100%	100%	100%

Residential Properties by Percent Unit Number

Data 2014-2018 ACS, 5 year estimates

Source:

Residential properties by properties by number of units by region

Property Type	Portland MSA	South Central/Southeast Oregon	South Coast	Southern Oregon	Willamette Valley
1-unit detached structure	478,112	35,878	28,946	120,378	256,501

Property Type	Portland MSA	South Central/Southeast Oregon	South Coast	Southern Oregon	Willamette Valley
1-unit, attached structure	43,040	1,765	1,405	6,893	17,855
2-4 units	57,049	3,163	2,407	12,659	31,776
5-19 units	85,363	1,531	1,950	6,647	37,479
20 or more units	100,327	1,610	1,440	7,463	26,137
Mobile Home, boat, RV, van, etc.	30,380	9,689	7,729	29,374	36,783
Regional Total	794,271	53,636	43,877	183,414	406,531

Residential Properties by Percent Unit Number

Data 2014-2018 ACS, 5 year estimates

Source:

Residential properties by percent of units by region

Property Type	Portland MSA	South Central/Southeast Oregon	South Coast	Southern Oregon	Willamette Valley
1-unit detached structure	60.2%	66.9%	66.0%	65.6%	63.1%
1-unit, attached structure	5.4%	3.3%	3.2%	3.8%	4.4%
2-4 units	7.2%	5.9%	5.5%	6.9%	7.8%
5-19 units	10.7%	2.9%	4.4%	3.6%	9.2%
20 or more units	12.6%	3.0%	3.3%	4.1%	6.4%
Mobile Home, boat, RV, van, etc.	3.8%	18.1%	17.6%	16.0%	9.0%
Regional Total	100%	100%	100%	100%	100%

Residential Properties by Unit Number

Data 2014-2018 ACS, 5 year estimates

Source:

Unit Size by Tenure

	Owners		Renters	
	Number	%	Number	%
No bedroom	5,634	0.55%	43,290	7.04%

	Owners		Renters	
	Number	%	Number	%
1 bedroom	27,060	2.64%	139,140	22.62%
2 bedrooms	175,266	17.10%	254,342	41.35%
3 or more bedrooms	816,893	79.71%	178,345	28.99%
Total	1,024,853	100.00%	615,117	100.00%

Unit Size by Tenure

Data 2018 ACS, 1 year estimates

Source:

Owner Occupied Unit Size by Region

	Central Oregon	Columbia Gorge	North Coast	Northeast Oregon
No bedroom	260	52	221	146
1 bedroom	1,145	452	1,352	1,101
2 bedrooms	9,674	2,752	8,153	7,510
3 or more bedrooms	48,619	10,280	21,178	27,086
Total	59,698	13,536	30,904	35,843

Owner Occupied Unit Size by Region

Data 2014-2018 ACS, 5 year estimates

Source:

Owner Occupied Unit Size Percentage by Region

	Central Oregon	Columbia Gorge	North Coast	Northeast Oregon
No bedroom	0.4%	0.4%	0.7%	0.4%
1 bedroom	1.9%	3.3%	4.4%	3.1%
2 bedrooms	16.2%	20.3%	26.4%	21.0%
3 or more bedrooms	81.4%	75.9%	68.5%	75.6%
Total	100.0%	100.0%	100.0%	100.0%

Owner Occupied Unit Size by Region (%)

Data 2014-2018 ACS, 5 year estimates

Source:

Owner Occupied Unit Size by Region

	Portland MSA	South Central/Southeast Oregon	South Coast	Southern Oregon	Willamette Valley
No bedroom	2,251	180	204	534	1,045
1 bedroom	10,915	944	1,424	2,791	3,914
2 bedrooms	73,848	6,088	6,499	24,625	38,145
3 or more bedrooms	368,893	20,801	16,427	81,941	184,073
Total	455,907	28,013	24,554	109,891	227,177

Owner Occupied Unit Size by Region

Data 2014-2018 ACS, 5 year estimates

Source:

Owner Occupied Unit Size Percentage by Region

	Portland MSA	South Central/Southeast Oregon	South Coast	Southern Oregon	Willamette Valley
No bedroom	0.5%	0.6%	0.8%	0.5%	0.5%
1 bedroom	2.4%	3.4%	5.8%	2.5%	1.7%
2 bedrooms	16.2%	21.7%	26.5%	22.4%	16.8%
3 or more bedrooms	80.9%	74.3%	66.9%	74.6%	81.0%
Total	100.0%	100.0%	100.0%	100.0%	100.0%

Owner Occupied Unit Size by Region (%)

Data 2014-2018 ACS, 5 year estimates

Source:

Renter Occupied Unit Size by Region

	Central Oregon	Columbia Gorge	North Coast	Northeast Oregon
No bedroom	1,161	416	999	940
1 bedroom	4,040	1,231	3,629	3,272
2 bedrooms	11,428	2,929	6,926	7,346
3 or more bedrooms	13,375	2,938	5,378	7,311
Total	30,004	7,514	16,932	18,869

Renter Occupied Unit Size by Region

Data 2014-2018 ACS, 5 year estimates

Source:

Renter Occupied Unit Size Percentage by Region

	Central Oregon	Columbia Gorge	North Coast	Northeast Oregon
No bedroom	3.9%	5.5%	5.9%	5.0%
1 bedroom	13.5%	16.4%	21.4%	17.3%
2 bedrooms	38.1%	39.0%	40.9%	38.9%
3 or more bedrooms	44.6%	39.1%	31.8%	38.7%
Total	100.0%	100.0%	100.0%	100.0%

Renter Occupied Unit Size by Region (%)

Data 2014-2018 ACS, 5 year estimates

Source:

Renter Occupied Unit Size by Region

	Portland MSA	South Central/Southeast Oregon	South Coast	Southern Oregon	Willamette Valley
No bedroom	24,991	713	710	2,786	7,715
1 bedroom	74,060	2,645	2,187	10,695	28,202
2 bedrooms	120,249	6,076	5,352	24,787	65,786
3 or more bedrooms	74,217	6,744	4,277	20,262	50,539
Total	293,517	16,178	12,526	58,530	152,242

Renter Occupied Unit Size by Region

Data 2014-2018 ACS, 5 year estimates

Source:

Renter Occupied Unit Size by Region

	Portland MSA	South Central/Southeast Oregon	South Coast	Southern Oregon	Willamette Valley
No bedroom	8.5%	4.4%	5.7%	4.8%	5.1%
1 bedroom	25.2%	16.3%	17.5%	18.3%	18.5%

	Portland MSA	South Central/Southeast Oregon	South Coast	Southern Oregon	Willamette Valley
2 bedrooms	41.0%	37.6%	42.7%	42.3%	43.2%
3 or more bedrooms	25.3%	41.7%	34.1%	34.6%	33.2%
Total	100.0%	100.0%	100.0%	100.0%	100.0%

Renter Occupied Unit Size by Region (%)

Data 2014-2018 ACS, 5 year estimates

Source:

Describe the number and targeting (income level/type of family served) of units assisted with federal, state, and local programs.

The Oregon Affordable Housing Inventory (OAHI), last updated in January 2020, identifies more than 63,000 units of affordable housing throughout the state. This inventory includes units with federal, state and local funding.

Of the state’s assisted units, 61 percent were targeted to families and 23 percent were targeted to the elderly.

While elderly and family households are the most common household and family types targeted for affordable units in all regions, the proportion of units targeted to these—and other unique populations—varied by region. Of note:

- Central Oregon and South Central have higher proportion of units targeted for elderly households (34% and 38% respectively).
- Columbia Gorge, Northeast Oregon, and South Central/Southeast Oregon regions had units targeted for Agricultural works above 10 percent of total restricted units.
- Columbia Gorge, which had fewer restricted units (967 units) than all other regions excluding South Coast, also had higher proportions of units targeted at those with physical disabilities (20%) and Veterans (16%).

According to HUD’s Multifamily Assistance and Section 8 Contracts Database, statewide there are 338 properties, representing 12,238 assisted units, with assistance contracts across Oregon.

- Forty percent (40%) of statewide assistance contracts (4,919 assisted units), had rents below 80 percent of Fair Market Rent (FMR);
- One in three (35%) or 4,319 assisted units had rents between 80 percent and 100 percent of FMR; and

- 20 percent or 2,506 assisted units had rents between 100 and 120 percent of FMR.

Assisted units are rare in rural Oregon. The Portland MSA contains 49 percent or 5,954 of all assisted units in Oregon. The next largest number and share of assisted units are located in Willamette County (21% or 2,250 assisted units) and Southern Oregon (11% or 1,288 assisted units). The remaining regions each have less than five percent of the state’s total assisted units. Units in the Portland MSA have the deepest levels of affordability, with 53 percent renting at 80 percent of the FMR. This compares to 37 percent in Southern Oregon and 17 percent in the Willamette Valley.

Statewide, among assisted units, one-bedroom units are the most common (60% of assisted units); studio and two bedroom units each comprise 16 percent of Oregon’s assisted units. Only seven percent of assisted units are three bedroom or larger. The proportion of studio units is highest in the Portland MSA (21%). Larger-sized assisted units are more prevalent in more rural regions. The figure below shows the number of assisted units by program type by region.

Number of Assisted Units by Program Type by Region

	Central Oregon	Columbia Gorge	North Coast	Northeast Oregon
202/8 NC	13	-	-	10
515/8 NC	8	-	80	8
HFDA/8 NC	137	119	98	355
LMSA	68	48	68	156
PRAC/202	85	12		24
HFDA/8 SR	-	-	46	-
PD/8 Existing	-	-	-	60
PRAC/811	-	-	-	19
202/162 NC	-	-	-	-
202/8 SR	-	-	-	-
Preservation	-	-	-	-
Sec 8 NC	-	-	-	-
Sec 8 SR	-	-	-	-
Sr Preservation RAC	-	-	-	-
811 PRA DEMO	-	-	-	-
RAD PH Conv	-	-	-	-
Total	311	179	292	632

Data Multifamily Assistance & Section 8 Database, updated: 3/27/2020

Source:

	Central Oregon	Columbia Gorge	North Coast	Northeast Oregon
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Note: A total of 401 assisted units in the database did not have geographic data, including 108 LMSA units, 268 PRAC/202 units, and 25 PRAC/811.

Number of Assisted Units by Program Type by Region

	Portland MSA	South Central/Southeast Oregon	South Coast	Southern Oregon	Willamette Valley
202/8 NC	818	31	31	100	295
515/8 NC	24		48	127	36
HFDA/8 NC	1,231	116	70	303	629
LMSA	1,290	117	72	131	1,062
PRAC/202	609	62	24	364	188
HFDA/8 SR	421	39	-	76	72
PD/8 Existing	77	-	-	-	-
PRAC/811	359	-	21	82	61
202/162 NC	24	-	-	-	16
202/8 SR	29	-	-	-	8
Preservation	373	-	30	105	20
Sec 8 NC	364	-	-	-	61
Sec 8 SR	268	-	-	-	-
Sr Preservation RAC	67	-	-	-	-
811 PRA DEMO	-	-	-	-	10
RAD PH Conv	-	-	-	-	62
Total	5,954	365	296	1,288	2,520

Data Multifamily Assistance & Section 8 Database, updated: 3/27/2020

Source:

Note: A total of 401 assisted units in the database did not have geographic data, including 108 LMSA units, 268 PRAC/202 units, and 25 PRAC/811.

Provide an assessment of units expected to be lost from the affordable housing inventory for any reason, such as expiration of Section 8 contracts.

Based on the HUD database, 169 properties have contract expiration dates before fiscal year 2026. These 169 expiring contracts affect 41 percent of the total assisted units in Oregon—

more than 12,000 units statewide. In some regions, the total number of units with expiring contracts is considerably higher—77 percent in Central Oregon, 58 percent in Columbia Gorge, 56 percent South Central/Southeast Oregon, and 51 percent in Southern Oregon.

The Portland MSA has nearly 6,000 assisted units covered by contracts that will expire by 2026 (37% of total assisted units in the region).

Does the availability of housing units meet the needs of the population?

The availability of housing units does not meet the need of Oregon residents. For low and moderate income households in Oregon, there is a considerable lack of affordable rental units, not only in higher cost urban areas, but across the state, as demonstrated in Oregon's Statewide Housing Plan which found:

- More than 85,000 units affordable to extremely low income households (making less than 30% AMI) are needed to meet demand; and
- More than 26,000 units affordable to moderate income households, making 50 percent to 80 percent AMI are needed to meet demand.

By far, the greatest urgent unmet housing need identified in stakeholder and resident consultation is to increase the supply of housing overall, but particularly the supply that is affordable to low and moderate income renters. This need exists not only in the Portland MSA but in every region across the state. Consistent with the findings from Oregon's Statewide Housing Plan, stakeholders consulted for this plan identified their region's most urgent (non-homeless) housing needs as:

- Rental units for extremely low income households (<30% Area Median Income or AMI), very low income households (<60% AMI), and low to moderate income households (<80% AMI); and
- Affordable and accessible housing for people with disabilities.

Emergency shelter capacity for persons experiencing homelessness is also a significant need across the state, as the number of people experiencing homelessness continues to rise statewide, including in small and rural communities.

Describe the need for specific types of housing:

The most needed housing types include:

- Rental units affordable to low and moderate income households, particularly rental units affordable to households making 30 percent or below AMI. The state has a deficit of over 85,000 affordable units affordable to these extremely low income households based on the Statewide Housing Plan.
- Housing units that are both accessible and affordable to persons with disabilities are insufficient to meet demand statewide.
- Affordable rental units that cater to the needs of those who have experienced homelessness or who have disabilities, including the states' growing senior population and seniors living alone.
- Low barrier housing or an increased number of landlords willing to rent to residents with criminal histories or prior evictions. Residents with a criminal history or past evictions are disproportionately likely to have unmet housing needs than low income households without these histories.
- Transitional housing programs to assist formerly homeless households achieve long-term housing stability.
- Permanently Supportive Housing.
- Expanded emergency shelter capacity to accommodate increasing homelessness across the state.

Discussion

The need to increase the supply of affordable housing units is critical, but so is ensuring that units—and supportive services—are available to those with disproportionate housing needs and high barriers to housing. This includes prioritizing units that are accessible to people with physical and sensory disabilities; developing Permanently Supportive Housing with sustainable funding for housing supports for persons transitioning out of homelessness, persons with SPMI, and SUDS; and reducing barriers to affordable housing encountered by adults with criminal histories and households that include members who are undocumented.

MA-15 Cost of Housing – 91.310(a)

Introduction

Data available from HUD and the U.S. Census show that housing costs increased significantly for both owners and renters since 2010. Between 2010 and 2018, both median home value and median contract rent increased by 40 percent. The median home value in 2018 was over \$340,000, nearly \$100,000 greater than in 2010. With a median income of \$63,426 in 2018, the maximum affordable home is approximately \$248,000—more than \$100,000 lower than the median home value.

Median contract rent rose from just over \$700 per month to nearly \$1,000 per month—slightly more than a 40 percent increase.

Cost of Housing

	Base Year: 2010	Most Recent Year: 2018	% Change
Median Home Value	\$244,500	\$341,800	40%
Median Contract Rent	\$705	\$989	40%

Cost of Housing

Data 2010 ACS, 1 year estimates (Base Year), 2018 ACS, 1 year estimates (Most Recent
Source: Year)

Rent Paid	Number	%
Less than \$500	43,860	7.41%
\$500-999	187,258	31.63%
\$1,000-1,499	226,940	38.33%
\$1,500-1,999	89,467	15.11%
\$2,000 or more	44,498	7.52%
Total	592,023	100%

Rent Paid

Data 2018 ACS, 1 year estimates
Source:

Rent Paid by Region

Rent Paid	Central Oregon	Columbia Gorge	North Coast	Northeast Oregon
Less than \$500	1,699	884	1,574	3,631
\$500-999	10,574	3,077	8,288	10,327
\$1,000-1,499	10,423	1,391	4,288	2,800
\$1,500-1,999	4,222	870	1,215	348
\$2,000 or more	1,597	244	304	141
Total	28,515	6,466	15,669	17,247

Rent Paid by Region

Data 2014-2018 ACS, 5 year estimates

Source:

Distribution of Rent Paid by Region

Rent Paid	Central Oregon	Columbia Gorge	North Coast	Northeast Oregon
Less than \$500	6%	14%	10%	21%
\$500-999	37%	48%	53%	60%
\$1,000-1,499	37%	22%	27%	16%
\$1,500-1,999	15%	13%	8%	2%
\$2,000 or more	6%	4%	2%	1%
Total	100%	100%	100%	100%

Distribution of Rent Paid by Region

Data 2014-2018 ACS, 5 year estimates

Source:

Rent Paid by Region

Rent Paid	Portland MSA	South Central/Southeast Oregon	South Coast	Southern Oregon	Willamette Valley
Less than \$500	14,812	2,142	1,995	6,456	10,666
\$500-999	74,744	9,920	6,200	27,289	71,657
\$1,000-1,499	116,557	2,006	2,740	15,134	48,538
\$1,500-1,999	53,486	241	621	4,342	11,385
\$2,000 or more	25,835	213	183	1,958	4,659
Total	285,434	14,522	11,739	55,179	146,905

Rent Paid by Region

Data 2014-2018 ACS, 5 year estimates

Source:

Distribution of Rent Paid by Region

Rent Paid	Portland MSA	South Central/Southeast Oregon	South Coast	Southern Oregon	Willamette Valley
Less than \$500	5%	15%	17%	12%	7%
\$500-999	26%	68%	53%	49%	49%
\$1,000-1,499	41%	14%	23%	27%	33%
\$1,500-1,999	19%	2%	5%	8%	8%
\$2,000 or more	9%	1%	2%	4%	3%
Total	100%	100%	100%	100%	100%

Rent Paid Age by Region

Data 2014-2018 ACS, 5 year estimates

Source:

Housing Affordability

% Units affordable to Households earning	Renter	Owner
30% HAMFI	28,425	No Data
50% HAMFI	96,500	38,775
80% HAMFI	326,425	133,500
100% HAMFI	No Data	234,195
Total	451,350	406,470

Housing Affordability

Data 2011-2015 CHAS

Source:

Housing Cost Burden and Severe Cost Burden

	Renters		Owners	
	Number	%	Number	%
Cost Burden	288,316	46.9%	256,049	25.0%
Severe Cost Burden	142,198	23.1%	97,873	9.5%

Cost Burden by Tenure

Data 2018 ACS, 1 year estimates

Source:

Monthly Rent

Monthly Rent (\$)	Efficiency (no bedroom)	1 Bedroom	2 Bedroom	3 Bedroom	4 Bedroom
Fair Market Rent	<i>no data for states</i>	<i>no data for states</i>	<i>no data for states</i>	<i>no data for states</i>	<i>no data for states</i>
High HOME Rent					
Low HOME Rent					

Monthly Rent

Data HUD FMR and HOME Rents

Source:

Is there sufficient housing for households at all income levels?

For households at or below 30 percent AMI there is a gap of over 85,000 affordable units. For households making between 31 percent and 50 percent of AMI, there is a gap of nearly 27,000 units. For households making over 80 percent of AMI there is a *surplus* of over 82,000 affordable units.

How is affordability of housing likely to change considering changes to home values and/or rents?

The rate of population increase began to slow after the state experienced a period of rapid growth during the recovery from the Great Recession, a period which also saw a significant growth in core urban areas, especially from migration (as opposed to natural growth). Population is expected to slow, which could potentially soften demand for new housing.

As the state’s population ages, housing needs of seniors and persons with disabilities will become more acute.

Stakeholder survey respondents suggest that one of the initial economic impacts of the COVID pandemic will be to further strain the supply of publicly supported affordable housing; they have already observed increases in homelessness and expect those numbers to rise when eviction moratoria are lifted. Depending on how households respond to long term impacts of the crisis, rental and homeowner prices may rise or fall based on in- or out-migration and the pace of economic recovery statewide and within individual regions.

How do HOME rents / Fair Market Rent compare to Area Median Rent? How might this impact your strategy to produce or preserve affordable housing?

HUD Fair Market Rents (FMRs) are not calculated at the state level; instead HUD FMRs are estimates of rental housing costs in local housing markets. In some cases, FMR studies fail to adjust to local market nuances. For example, many rural Oregon communities are also seasonal vacation destinations. Second homes, vacation activity, and high demand work together to push rents above FMRs, making vouchers hard to use in these markets. In other communities, the housing market has changed significantly in recent years such that it is not captured by the period of sample data used on the FMR calculations.

The Fair Market Rents play an active role in determining the rent levels allowable in affordable housing projects, and as such, are the foundation for identifying the subsidy required to make a project viable. In cases where the FMRs fall below the market rent, the gap between those that can be served by the programs, which cover the lower end of FMRs, and those that are served by the market widens. Low FMRs result in higher need for subsidy, in addition to higher demand for the affordable units to serve households with lower incomes who are furthest from being able to be served in the market. Even in those communities where allowable affordable rents are close to those in the market, there exists a demand for affordable housing given the lack of quality available rental housing. These factors mean that it is of the utmost importance to both preserve existing affordable housing resources in the community as well as to prioritize bringing new housing resources into affordability through new construction and rehabilitation.

MA-20 Condition of Housing – 91.310(a)

Introduction:

This section discusses the conditions of housing in the State of Oregon. It uses a combination of HUD and U.S. Census data as well as findings from the community engagement process.

Definitions

Standard Condition: Housing conditions that provide for decent, safe and sanitary living conditions.

Substandard condition: Housing conditions that are conventionally considered unacceptable which may be defined in terms of lacking plumbing facilities, one or more major systems not functioning properly, or overcrowded conditions.

Substandard but suitable for rehabilitation: Housing conditions that are conventionally considered unacceptable, but the home can be rehabilitated to standard conditions.

Condition of Units

Condition of Units	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
With one selected Condition	256,604	25.04%	273,807	44.51%
With two selected Conditions	8,571	0.84%	28,577	4.65%
With three selected Conditions	649	0.06%	1,615	0.26%
With four selected Conditions	0	0.00%	0	0.00%
No selected Conditions	759,029	74.06%	311,118	50.58%
Total	1,024,853	100.00%	615,117	100.00%

Condition of Units

Data 2014-2018 ACS, 1 year estimates

Source:

Year Unit Built

Year Unit Built	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
2000 or later	207,151	20.21%	115,204	18.73%
1980-1999	287,318	28.04%	180,144	29.29%
1950-1979	361,455	35.27%	228,519	37.15%
Before 1950	168,929	16.48%	91,250	14.83%

Year Unit Built	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
Total	1,024,853	100.00%	615,117	100.00%

Year Unit Built

Data 2014-2018 ACS, 1 year estimates

Source:

Owner Occupied Unit Age by Region

Year Unit Built	Central Oregon	Columbia Gorge	North Coast	Northeast Oregon
2000 or later	21,469	2,553	5,871	5,468
1980-1999	21,543	3,082	8,483	8,392
1950-1979	13,593	4,647	10,248	13,385
Before 1950	3,093	3,254	6,302	8,598
Total	59,698	13,536	30,904	35,843

Owner Occupied Unit Age by Region

Data 2014-2018 ACS, 5 year estimates

Source:

Owner Occupied Unit Age Percentage by Region

Year Unit Built	Central Oregon	Columbia Gorge	North Coast	Northeast Oregon
2000 or later	36.0%	18.9%	19.0%	15.3%
1980-1999	36.1%	22.8%	27.4%	23.4%
1950-1979	22.8%	34.3%	33.2%	37.3%
Before 1950	5.2%	24.0%	20.4%	24.0%
Total	100.0%	100.0%	100.0%	100.0%

Owner Occupied Unit Age by Region (%)

Data 2014-2018 ACS, 5 year estimates

Source:

Owner Occupied Unit Age by Region

Year Unit Built	Portland MSA	South Central/Southeast Oregon	South Coast	Southern Oregon	Willamette Valley
2000 or later	82,753	4,337	3,874	22,105	39,835
1980-1999	124,106	6,837	6,419	33,754	58,609

Year Unit Built	Portland MSA	South Central/Southeast Oregon	South Coast	Southern Oregon	Willamette Valley
1950-1979	155,037	11,179	10,452	41,788	96,766
Before 1950	94,011	5,660	3,809	12,244	31,967
Total	455,907	28,013	24,554	109,891	227,177

Owner Occupied Unit Age by Region

Data 2014-2018 ACS, 5 year estimates

Source:

Owner Occupied Unit Age Percentage by Region

Year Unit Built	Portland MSA	South Central/Southeast Oregon	South Coast	Southern Oregon	Willamette Valley
2000 or later	18.2%	15.5%	15.8%	20.1%	17.5%
1980-1999	27.2%	24.4%	26.1%	30.7%	25.8%
1950-1979	34.0%	39.9%	42.6%	38.0%	42.6%
Before 1950	20.6%	20.2%	15.5%	11.1%	14.1%
Total	100.0%	100.0%	100.0%	100.0%	100.0%

Owner Occupied Unit Age by Region (%)

Data 2014-2018 ACS, 5 year estimates

Source:

Renter Occupied Unit Age by Region

Year Unit Built	Central Oregon	Columbia Gorge	North Coast	Northeast Oregon
2000 or later	8,874	1,135	1,791	2,163
1980-1999	10,584	1,682	4,468	4,390
1950-1979	8,133	2,798	6,523	7,587
Before 1950	2,413	1,899	4,150	4,729
Total	30,004	7,514	16,932	18,869

Renter Occupied Unit Size by Region

Data 2014-2018 ACS, 5 year estimates

Source:

Renter Occupied Unit Age Percentage by Region

Year Unit Built	Central Oregon	Columbia Gorge	North Coast	Northeast Oregon
2000 or later	29.6%	15.1%	10.6%	11.5%
1980-1999	35.3%	22.4%	26.4%	23.3%
1950-1979	27.1%	37.2%	38.5%	40.2%
Before 1950	8.0%	25.3%	24.5%	25.1%
Total	100.0%	100.0%	100.0%	100.0%

Renter Occupied Unit Size by Region (%)

Data 2014-2018 ACS, 5 year estimates

Source:

Renter Occupied Unit Age by Region

Year Unit Built	Portland MSA	South Central/Southeast Oregon	South Coast	Southern Oregon	Willamette Valley
2000 or later	55,217	1,298	1,216	10,144	23,837
1980-1999	89,646	3,637	3,280	16,864	38,858
1950-1979	101,434	7,208	5,919	23,365	70,218
Before 1950	47,220	4,035	2,111	8,157	19,329
Total	293,517	16,178	12,526	58,530	152,242

Renter Occupied Unit Size by Region

Data 2014-2018 ACS, 5 year estimates

Source:

Renter Occupied Unit Age by Region

Year Unit Built	Portland MSA	South Central/Southeast Oregon	South Coast	Southern Oregon	Willamette Valley
2000 or later	18.8%	8.0%	9.7%	17.3%	15.7%
1980-1999	30.5%	22.5%	26.2%	28.8%	25.5%
1950-1979	34.6%	44.6%	47.3%	39.9%	46.1%
Before 1950	16.1%	24.9%	16.9%	13.9%	12.7%
Total	100.0%	100.0%	100.0%	100.0%	100.0%

Renter Occupied Age Size by Region (%)

Data 2014-2018 ACS, 5 year estimates

Source:

Risk of Lead-Based Paint Hazard

Risk of Lead-Based Paint Hazard	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
Total Number of Units Built Before 1980	530,384	52%	319,769	52%
Housing Units build before 1980 with children present	109,615	12%	55,095	9%

Risk of Lead-Based Paint

Data 2014-2018 ACS, 1 year estimates (Total Units) 2011-2015 CHAS (Units with
Source: Children present)

Vacant Units

	Suitable for Rehabilitation	Not Suitable for Rehabilitation	Total
Vacant Units	145,773 Estimate	3,000 Estimate	148,773
Abandoned Vacant Units	Not tracked	Not tracked	Not tracked
REO Properties	Not tracked	Not tracked	Not tracked
Abandoned REO Properties	Not tracked	Not tracked	Not tracked

Vacant Units

Data 2014-2018 ACS, 1 year estimates
Source:

The number of vacant units suitable or unsuitable for rehabilitation is not tracked on a statewide basis, and the cost of developing such an inventory would be extensive. Based on the proportion of the state's units that have substantial condition issues estimated by CHAS data, it is safe to conclude that the vast majority of the vacant units in Oregon are suitable for rehabilitation and approximately 3,000 are unsuitable for rehabilitation.

Need for Owner and Rental Rehabilitation

More than one in four (26%) owner occupied units and nearly half (49%) of renter occupied units had at least one housing condition issue. These HUD-defined conditions include: lacking complete kitchen facilities, lacking complete plumbing facilities, overcrowded home, and lacking telephone service. This data suggests that the need for rehabilitation is much greater among renter occupied units than owner occupied units.

Several regions—Columbia Gorge, North Coast, Northeastern Oregon, and South Central/Southeastern Oregon—have a significantly higher proportion (around 25%) of rental units built before 1950. Columbia Gorge and Northeastern Oregon also had higher percentages

of owner occupied units built before 1950. Central Oregon had the highest proportion of owner and renter occupied units built since 2000, which represented 36 percent of owner occupied units and 30 percent of renter occupied units.

Participants in the Columbia Gorge/Northeast Oregon stakeholder roundtable characterized housing affordable to low and moderate income households as being in very poor condition, noting that many of these units are located in flood plains. Much of the naturally occurring affordable housings stock in this region consists of very old manufactured homes.

CDBG has provided housing rehabilitation to approximately 527 households for the last five years with an annual average of 105 households receiving owner occupied rehabilitation services each year.

Estimated Number of Housing Units Occupied by Low or Moderate Income Families with LBP Hazards

According to the HUD table on age of housing stock, there are more than 530,000 owner occupied units and nearly 320,000 renter occupied units in Oregon built before 1980, making these units at increased risk of containing the health hazard of lead-based paint. Of these, nearly 110,000—or 12 percent of renter occupied units—and more than 55,000—or 9 percent of owner occupied units—house children, who have an increased risk of the negative health hazard of lead based paint. Families who are low income or otherwise unable to afford hazard mitigation and have young children are most at risk for lead-related health hazards.

The regions of Columbia Gorge, North Coast, Northeastern Oregon, and South Central/Southeastern Oregon have a greater proportion of older housing stock, particularly units built before 1950, when lead-based paint was prevalent.

Discussion:

There is considerable need for housing rehabilitation in Oregon due to the age or incidence of housing condition issues as specified by HUD, and this was exacerbated by the wildfires in the summer of 2020. Statewide nearly 570,000 units had at least one housing condition challenge. An estimated 4,000 homes were lost to fire. Over one-quarter (26%) of owner occupied units and nearly a half (49%) of renter occupied units had at least on housing condition as specified by HUD. There are over 530,000 owner occupied units and nearly 320,000 renter occupied units in Oregon built before 1980; these units are at increased risk of containing lead-based paint and in need of potential rehabilitation and/or remediation.

MA-25 Public and Assisted Housing – (Optional)

Introduction:

The State of Oregon does not own or operate PHA developments and does not administer voucher programs.

Totals Number of Units

	Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers					
				Total	Project-based	Tenant-based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
# of units vouchers available	0	704	5,577	32,860	1,310	18,069	2,939	1,476	9,749
# of accessible units									
*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition									

Total Number of Units by Program Type

Data PIC (PIH Information Center)

Source:

Describe the supply of public housing developments:

N/A. The State of Oregon does not own or operate any PHA developments.

Describe the number and physical condition of public housing units in the jurisdiction, including those that are participating in an approved Public Housing Agency Plan:

N/A. The State of Oregon does not own or operate any PHA developments.

Describe the Restoration and Revitalization Needs of public housing units in the jurisdiction:

N/A. The State of Oregon does not own or operate any PHA developments.

Describe the public housing agency's strategy for improving the living environment of low- and moderate-income families residing in public housing:

N/A. The State of Oregon does not own or operate any PHA developments.

MA-30 Homeless Facilities – 91.310(b)

Introduction

Oregon Housing and Community Services is focusing its use of federal and state funds towards securing and making available safe housing for all Oregonians. Through the Community Action network and their partnerships with other community providers of services, funds are provided to deliver a range of services and assistance, including transitional housing and homeless (inclusive of domestic violence) shelters. OHCS works closely with the state's seven Continuums of Care who conduct an annual inventory of homeless facilities as part of the annual Point-in-Time count. This inventory, along with service delivery and Point-in-Time unsheltered data, helps identify the areas and populations of need.

Nearly two-thirds of persons experiencing homelessness are unsheltered. Some communities lack emergency shelter facilities; in these areas motel and hotel vouchers are used to secure temporary shelter. The COVID crisis has further constricted the supply of congregant emergency shelter beds in the state in order to meet public health criteria for social distancing. Emergency shelter facilities and transitional housing are among the top priorities identified by stakeholders to address urgent housing needs in the state's non-entitlement areas.

The housing barriers faced by homeless households are intensified by the current housing market which directly impacts the demand and length of time people remain in shelters. In addition, many persons experiencing homelessness require supportive services as they transition to living independently; developing Permanent Supportive Housing and supporting projects using Housing First principles are a priority for OHCS.

Facilities Targeted to Homeless Persons

	Emergency Shelter Beds		Transitional Housing Beds	Permanent Supportive Housing Beds	
	Year Round Beds (Current & New)	Voucher / Seasonal / Overflow Beds	Current & New	Current & New	Under Development
Households with Adult(s) and Child(ren)	2,311	594	976	2,991	Data Unavailable
Households with Only Adults	2,979		1,716	4,723	
Chronically Homeless Households	-		-	2,908	
Veterans	168		382	2,165	
Unaccompanied Youth	212		229	81	

Facilities Targeted to Homeless Persons

Oregon Shelter Beds - 2018

	Emergency Shelter	Transitional Housing	Safe Haven
Total 2018	4,174	2,235	10

Oregon Shelter Beds - 2018

Data Oregon Statewide Shelter Study
Source:

Dedicated Veteran and Youth Beds - 2018

	Dedicated Veteran Bed	Dedicated Youth Beds
Total 2018	321	436

Vacant Units

Data Oregon Statewide Shelter Study
Source:

Describe mainstream services, such as health, mental health, and employment services to the extent those services are used to complement services targeted to homeless persons.

At the local level, the Community Action Agency (CAA) network works closely with mainstream providers of employment, health/mental health, veterans, elderly, education, child welfare and TANF self-sufficiency clients. Local partnerships have been developed with the Department of Human Services branches to provide preventative services for TANF (Temporary Assistance for Needy Families) eligible families who are at risk of becoming homeless. In many cases, Community Action Agencies operate mainstream services internally. These services include childcare, employment training, energy assistance, emergency food, Head Start, information and referral, in-home care, transportation, and supportive services for seniors.

Three-fourths of the chronically homeless have a serious mental illness or substance abuse addiction, and about 65 percent of residents receiving care at state mental and behavioral health hospitals were homeless prior to admission. There is a strong correlation between untreated mental illness and homelessness. One of the key findings from the ESG program team's outreach was the need to embed mental health professionals in shelters and street outreach teams to better align systems and connect persons experiencing homelessness to available resources. There is little crossover between Oregon's Medicaid Behavioral Health system and the state's homeless system, and OHCS is working to bridge this gap. The state is limited in the number of facilities able to serve people with severe and persistent mental illness and are working to expand service delivery through Coordinated Care agencies. This is discussed in more detail in MA-35.

The VA Mission Act began implementation in 2019. This federal legislation greatly improves the ability of veterans to receive health care services in their community and stakeholders familiar with veteran health care needs attested to the increased access to care options provided by the Act. However, in some rural Oregon communities, an insufficient number of healthcare providers are participating in the choice programs. One stakeholder described being informed by a local chiropractor, himself a veteran, that the process for being paid under the Community Care Network is too slow and administratively burdensome to justify participating.

As discussed in PR-05, by statute the CAA network is the subgrantee for homeless services funds. OHCS is working with CAA partners to develop relationships with local organizations serving people of color. Since Black and African American residents and Native American residents are disproportionately more likely to be homeless and at higher risk of homelessness, expanding the CAA network to partners serving people of color should provide improved access to resources for homelessness prevention and connect those experiencing homelessness to mainstream services administered by CAAs.

List and describe services and facilities that meet the needs of homeless persons, particularly chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth. If the services and facilities are listed on screen SP-40 Institutional Delivery Structure or screen MA-35 Special Needs Facilities and Services, describe how these facilities and services specifically address the needs of these populations.

Community Action Agencies and their providers have designed services to meet specific needs of special populations; i.e., homeless youth, older adults, victims of domestic violence, people with cognitive, physical and developmental disabilities and others that align with the homeless definition as proscribed by HUD. Many services include case management, emergency health services and medication, transportation, and in many cases shelter.

Throughout the balance of state legal assistance, as well as mortgage and rental assistance are provided. If needed, utility assistance is also available. Along with case management, several Community Action Agencies provide life skills and home rehabilitation classes to households needing assistance. Funding is available for outreach and takes different forms across the state. The need for mental health services and SUDs treatment is far greater than its availability. Social workers, mental health, and addiction counselors, for example, are very rare in rural areas. As discussed in the Needs Assessment, homelessness in Oregon's rural and frontier communities was increasing prior to the COVID crisis, and the CAA network is not sufficient to meet the supportive service needs of persons experiencing homelessness. In partnership with OHA, each new housing project or preservation project funded through OHCS includes resources to connect prospective tenants to resources including Medicaid. In rural areas, the Oregon Health Authority, the county health authority, and local school district are often the primary providers of services and the local institution with the greatest capacity to serve individuals and families experiencing homelessness.

MA-35 Special Needs Facilities and Services – 91.310(c)

Introduction

There is a statewide network of community based organizations that support people who are not homeless but who require supportive housing. People who are returning to the community from incarceration, mental and health institutions often require additional levels of support to find and maintain housing.

OHCS has been a partner in developing units with supportive housing throughout the state. It is Oregon's intention to dedicate Housing Trust Fund (HTF) dollars for capital financing for permanent supportive housing projects. The need for this type of supportive housing is great and far exceeds the demand for HTF and HOME dollars available for construction. While HTF and HOME do not fund services, project developers submit applications to build or rehabilitate the housing with service providers identified.

Through the PSH Institute, OHCS hopes to seed substantial understanding of and interest in developing PSH projects, which OHCS believes is critical to addressing chronic homelessness. Building capacity in rural Oregon through training and technical assistance is crucial to building a development pipeline for PSH in rural Oregon.

HOME funds will be dedicated to preservation activities in rural communities, with a focus on projects that need recapitalization. OHCS will also consider utilizing HOME funds for other recapitalization opportunities over the five year timeline of the Consolidated Plan including, but not limited to, conversion of formerly naturally occurring affordable housing to permanently affordable housing owned and/or operated by local nonprofit organizations.

OHCS has pursued opportunities to provide supportive services to the people who need them such as the state's HUD 811 grant for Project Rental Assistance (PRA) and Mainstream Vouchers deployed to increase the number of affordable and integrated housing opportunities for people with a disability resulting from a severe and persistent mental illness, and people with an intellectual or developmental disability. Within these target populations, priority is given to individuals residing in an institutional, hospital, licensed or group home setting who are ready to transition to a supported housing setting or individuals who are homeless, at risk of becoming homeless or at risk of reentering an institution, hospital, licensed or facility setting. In addition to services to support independent living, 811 funds can be used for eviction prevention.

It is impractical to provide a complete list of the facilities statewide that assist people who are not homeless but require services. However the lead partners in this area are the Community Action Agencies, Department of Human Services, community food banks, workforce

development offices, and many other agencies that work with low-income and extremely low-income people.

Persons with HIV/AIDS and their families are assisted through tenant based rental assistance (TBRA) funded by HOPWA. The state provides assistance to an average of 60 households annually and has set a goal for 15 Permanent Housing placements.

HOPWA Assistance Baseline Table

Type of HOWA Assistance	Number of Units Designated or Available for People with HIV/AIDS and their families
TBRA	60
PH in facilities	0
STRMU	0
ST or TH facilities	0
PH placement	15

HOPWA Assistance Baseline

Data HOPWA CAPER and HOPWA Beneficiary Verification Worksheet, 2018
Source:

To the extent information is available, describe the facilities and services that assist persons who are not homeless but who require supportive housing, and programs for ensuring that persons returning from mental and physical health institutions receive appropriate supportive housing

There are similarities as well as unique differences in supportive housing needs for non-homeless special need populations including people with disabilities, the elderly, frail elderly, people with mental illness, people returning to community after incarceration, people with alcohol or other drug addictions, survivors of intimate partner violence, people with HIV/AIDS and their families. One size does not fit all.

Just as needs vary widely, supportive services can take many forms, including:

- Case management
- Educational, vocational and other recovery-oriented services
- Medication management and counseling
- Assistance in gaining access to government benefits
- Referrals to medical services, mental health care and treatment for SUDs
- Recommendations for other needed services, such as legal support
- Rental assistance, payment of utilities, or grants for security deposits

People escaping domestic violence may require additional trauma-informed services and a high level of confidentiality.

People who were formerly incarcerated are often high need, and have a high rate of comorbidity and are frequently denied housing by landlords. Many housing systems are not able to support this population.

Supportive housing and services for adults with SPMI. Oregon’s Performance Plan (OPP) (July 2016-June 2019) was developed to resolve a U.S. Department of Justice investigation into the extent of Oregon’s compliance with the *Olmstead* integration mandate as it applies to adults with serious and persistent mental illness (SPMI). As a part of this plan, Oregon committed to numerous actions to improve mental health services for adults with SPMI, including building capacity for Assertive Community Treatment (ACT), mobile crisis response teams, and supportive housing for persons with SPMI.

A June 2020 report on the state’s compliance with the OPP found that the state was nearly in compliance with supportive housing commitments but still needs to make progress toward meeting other goals:

- The number of SPMI adults receiving ACT, 1,325 fell short of the goal of serving 2,000 adults;
- All Oregon counties now have some form of mobile crisis service and served 8,905 residents in 2019—much higher than the 3,700 goal. One of the benefits of this approach is significantly reducing the number of criminal justice interactions from crisis episodes; in 2019, 83 percent of cases individuals in crisis did not interact with the criminal justice system.
- Expansion of community mental health services is still inadequate, and community services rely heavily on mobile crisis response.

In the OPP, Oregon committed to increase the number of SPMI adults in supported housing that best meets the individual’s needs and choices. The state fell just short of meeting its goal of 2,000 (1,903 housed). With budget reductions due to revenue shortfalls caused by the COVID pandemic Oregon’s Rental Assistance Program (RAP)—which provided much of the funding for supportive housing efforts—is facing budget cuts which will likely result in the state being unable to maintain its commitment of 2,000 adults with SPMI living in supported housing.

Describe programs for ensuring that persons returning from mental and physical health institutions receive appropriate supportive housing

Oregon is committed to meeting the promise of the *Olmstead* integration mandate, providing Oregon residents with disabilities, including SPMI, to live in the most integrated, independent setting desired by the individual. As part of the OPP, Oregon’s Community Care Organizations

(CCO) have established warm handoff protocols (<https://www.oregon.gov/oha/HSD/BHP/BHQPIPResources/Warm-Handoff-Guidance.pdf>) to increase the likelihood that individuals with SPMI released from institutional settings have the support needed for successful integration into community living. For elderly or frail elderly who receive care in a nursing home setting, when they return to community after care they could be transitioned community based options, where long term services and supports can be met through a variety of programs. Access to these programs depend on if they qualify for Medicaid or have the ability to pay for services.

The OHOP Program, which is funded by multiple federal, state and local funding streams, to include HOPWA Formula, is an integrated program within the HIV care continuum and is designed to provide stable supportive housing consistent with the National HIV/AIDS Strategy. About 10 percent of HOPWA clients have supportive housing needs. The program acts as a bridge to longer term housing stability such as Housing Choice Voucher (formerly known as Section 8) or self-sufficiency. OHOP referrals are accepted through local Ryan White HIV case managers, as well as directly through the Oregon Department of Corrections. In addition, OHOP is the recipient of competitive HOPWA funds to provide supportive housing to persons who have difficulty remaining stably housed due to co-occurring mental health and HIV disease. Program staff works closely with mental health providers throughout the state as a part of the client's housing stability planning process. The requirement that HOPWA participants be active in Ryan White case management is a real strength of Oregon's HOPWA program.

In addition to the OHOP program, OHA offers three state-funded innovative programs to support people living with HIV who have mental illness, substance use disorders, or other behavioral health needs. These pilot programs are part of OHA's End HIV Oregon Initiative.

Rental Assistance Programs. OHA awards funds to local service and housing providers to assist both target populations to locate, secure and maintain occupancy of supported, community-based housing. The programs provide rent subsidies, funds to cover associated costs and staff support of program participants. The Rental Assistance Program serving individuals with a serious mental illness gives priority to those individuals transitioning from the Oregon State Hospital or a licensed residential setting as well as individuals who are homeless or at risk of homelessness. The AD60 Housing Assistance Program serving individuals with a substance use disorder make possible supported occupancy in alcohol and drug-free community-based housing.

Adult Mental Health Initiative (AMHI). AMHI funds regional and local organizations to increase supported housing opportunities for individuals through financial assistance for rent and related housing costs as well as the assistance available from Assertive Community Treatment (ACT) as participants transition from institutional care to independent living.

Supported Housing Development Funding. OHA Health Systems Division awards state-funded grants for the capital costs of developing housing units to serve individuals with mental illness and substance use disorders with the goal of residents living successfully in a community-based, integrated setting.

Specify the activities that the jurisdiction plans to undertake during the next year to address the housing and supportive services needs identified in accordance with 91.215(e) with respect to persons who are not homeless but have other special needs. Link to one-year goals. 91.315(e)

For meeting the housing needs of members of special needs populations, OHCS is committed to building 25,000 affordable housing units over its five-year Statewide Housing Plan period and aggressively pursuing a preservation strategy in rural Oregon. As discussed previously, developing the pipeline for PSH in rural Oregon is a priority to begin to address the unmet supportive housing needs of members of homeless and non-homeless special needs populations. Securing affordable housing units is the crucial first step; it is not unusual for a CAA to have money for rent assistance but be unable to find units in which to place residents. A resident focus group participant with a disability described searching for 10 months for a unit that would take her voucher and meet her accessibility needs. Another declared that she leased the “last” apartment for rent in all of Tillamook County.

As funding is available, OHCS would like to see a more intentional land acquisition strategy and strategy for acquiring market rate housing and converting it to affordability. While OHCS currently coordinates with other state agencies, this collaboration is often opportunistic; the high level of coordination required for the state’s response to the COVID pandemic has highlighted the need for more strategic coordination of resources, especially in the area of supportive services.

As discussed above, funding for supportive services is lacking and mental and behavioral health services are in short supply in rural Oregon. Access to mental health and other supportive services is considered an urgent unmet need by a sizeable proportion of stakeholders. Long term housing subsidies and a sustainable funding source for supportive services is needed; legislative action will be needed to fund supportive services, but such a budget request may be unsuccessful given the revenue reductions anticipated from ongoing fiscal impacts of COVID.

The Oregon Health Authority, HIV Care and Treatment Program will continue to provide housing and supportive services to persons living with HIV regardless of homelessness status as described above. HOPWA formula funds specifically will be utilized to provide tenant based rental assistance, permanent housing placement in the form of deposit assistance, supportive services, housing case management, housing information services and facility-based housing

subsidy assistance. Facility-based housing subsidy assistance will only be provided through CARES Act funds from 2019, in the form of temporary hotel/motel assistance. While people who are experiencing homelessness will receive priority on the program wait list for deposit and rental assistance, services will be available to all eligible people living with HIV/AIDS regardless of homelessness status.

The supportive housing needs of people released from incarceration far exceeds the available resources. The Department of Corrections has one staff person that works statewide to house the most medically and psychiatrically fragile inmates upon release. When possible, service providers are engaged with select inmates who are preparing for release. After release, management transitions them to post-prison supervision, which has limited resources to address the housing needs of this population.

For entitlement/consortia grantees: Specify the activities that the jurisdiction plans to undertake during the next year to address the housing and supportive services needs identified in accordance with 91.215(e) with respect to persons who are not homeless but have other special needs. Link to one-year goals. (91.220(2))

N/A.

MA-40 Barriers to Affordable Housing – 91.310(d)

Negative Effects of Public Policies on Affordable Housing and Residential Investment

In 2018, the Oregon State Legislature passed Bill 4006 which provided funding to conduct a study of the forces that drive the cost of developing affordable multi-family rental housing in the state resulting in the Affordable Housing Cost Study published in 2019. The study found that affordable housing developments benefit from economies of scale with larger project costing less per unit than smaller projects. Also local factors such as community opposition had a measurable impact on costs. Specifically, projects that had four or more community meetings cost 8 percent more on average compared to those that had three or fewer community meetings. Labor supply varies in different communities and affects costs with tighter labor markets driving construction cost up. Land costs vary widely across the state as well as within individual jurisdictions as a function of many factors, including parcel size and shape, extent of required site remediation or preparation, proximity to amenities, and a host of other factors. Increases in the costs associated with permit fees and system development charges rose disproportionately compared to other costs over the study's time period and the subsequent increase to the overall cost of development may act as a development deterrent.

The review of state regulations that affect residential development and investment for the 2021 Analysis of Impediments reflected positively on the state. That review found that the state's standards are stronger, and remove barriers to fair housing choice more effectively, than those in the statutes of most 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.

State and local housing policies were not among the most serious barriers to housing choice identified by stakeholder survey respondents.

In stakeholder roundtable discussions, participants attributed some difficulties competing for state affordable housing funds due to a lack of local capacity to develop competitive proposals and a lack of capacity to see a project to completion. Others identified environmental land use policies, particularly the high cost of mandatory wetlands mitigation, as the primary limitation to increasing the housing supply in Oregon.

MA-45 Non-Housing Community Development Assets -91.315(f)

Introduction

Maintaining and expanding existing infrastructure is of paramount importance to fostering a healthy business environment and sustaining communities where people can live, work and play. Compliant and functional water and sewer systems are critical to support the economic growth of the local communities, regions, and the state as a whole.

Most rural cities and counties turn to the CDBG program as one of the essential funding programs for funding major public facilities that directly serve low and moderate income communities. The CDBG program has subsequently played a major role in economic revitalization of the most rural areas of Oregon through projects such as drinking water and sewer improvements, food banks, Head Start facilities, senior centers, fire stations, and mental health facilities. Additionally, the program assists microenterprises with tools such as financial bookkeeping and business marketing, to assist start-up businesses. Another area of focus for the program is housing rehabilitation. The CDBG program funds programs that assist low and moderate income homeowners with much needed health and safety related repairs.

Economic Development Market Analysis

Table 43 presents 2015 business activity data for Oregon's non-entitlement areas. As shown, education, retail, and arts, entertainment, and accommodations businesses employ the greatest numbers of workers in non-entitlement areas.

Table 43a updates replicated HUD's analysis of business activity using 2017 data from the American Community Survey (Workers) and Longitudinal Employer-Household Dynamics (Jobs). Statewide, the largest business sectors are also education, retail, and arts, entertainment, and accommodations. In addition, the manufacturing sector employs 11 percent of workers statewide.

Unemployment rates in Oregon's non-entitlement areas may be higher than the state unemployment data, based on available data shown. While a year-to-year comparison is not available, the non-entitlement unemployment rate of 10 percent is unchanged from the rate in the 2016-2020 Consolidated Plan, suggesting that higher unemployment outside the state's urban and suburban centers is a structural issue in Oregon.

None of the data reflect the impacts of COVID on employment overall and by sector. Based on the stakeholder roundtables and surveys, it is clear that regions reliant on tourism have been adversely impacted by COVID restrictions. Secondary, but essential sectors, like childcare, are in crisis in many parts of the state. Stakeholder roundtable participants all identified childcare as a

significant community development need and one that hinders economic opportunity in the region.

Business Activity—Oregon Non-Entitlement Areas, 2015

Business by Sector	Number of Workers	Number of Jobs	Share of Workers %	Share of Jobs %	Jobs less workers %
Agriculture, Mining, Oil & Gas Extraction	30,300	35,700	6%	10%	4
Arts, Entertainment, Accommodations	61,388	48,778	13%	14%	1
Construction	29,102	23,816	6%	7%	1
Education and Health Care Services	81,244	52,794	17%	15%	-2
Finance, Insurance, and Real Estate	19,859	11,602	4%	3%	-1
Information	7,206	3,800	2%	1%	0
Manufacturing	64,224	57,089	14%	16%	2
Other Services	19,988	15,561	4%	4%	0
Professional, Scientific, Management Services	25,542	13,704	5%	4%	-2
Public Administration	7	0	0%	0%	0
Retail Trade	69,317	49,885	15%	14%	-1
Transportation and Warehousing	17,475	15,101	4%	4%	1
Wholesale Trade	20,390	13,333	4%	4%	-1
Total	446,042	341,163	--	--	--

Business Activity

Data 2011-2015 ACS (Workers), 2015 Longitudinal Employer-Household Dynamics (Jobs)

Source:

Business Activity—State of Oregon, 2017

Business by Sector	Number of Workers	Number of Jobs	Share of Workers %	Share of Jobs %	Jobs less workers %
Agriculture, Mining, Oil & Gas Extraction	65,974	46,585	3%	3%	0%
Arts, Entertainment, Accommodations	190,956	212,189	10%	12%	2%
Construction	125,974	103,428	6%	6%	-1%
Education and Health Care Services	456,806	431,350	23%	23%	0%
Finance, Insurance, and Real Estate	111,668	84,112	6%	5%	-1%
Information	35,516	37,469	2%	2%	0%
Manufacturing	228,551	186,965	11%	10%	-1%
Other Services	92,950	77,270	5%	4%	-1%
Professional, Scientific, Management Services	215,384	251,177	11%	14%	3%
Public Administration	90,669	73,811	5%	4%	-1%
Retail Trade	232,341	205,480	12%	11%	-1%
Transportation and Warehousing	90,155	69,334	5%	4%	-1%
Wholesale Trade	55,955	77,505	3%	4%	1%
Total	1,992,899	1,856,675	100%	100%	0

Business Activity

Data 2017 1yr ACS (Workers), 2017 Longitudinal Employer-Household Dynamics (Jobs)

Source:

Labor Force—Non-entitlement Areas, 2015

Total Population in the Civilian Labor Force	678,646
Civilian Employed Population 16 years and over	608,730
Unemployment Rate	10.31
Unemployment Rate for Ages 16-24	26.14
Unemployment Rate for Ages 25-65	6.33

Labor Force

Data 2011-2015 ACS

Source:

Labor Force—Statewide, 2018

Total Population in the Civilian Labor Force	2,135,976
Civilian Employed Population 16 years and over	2,029,021
Unemployment Rate	5.0%
Unemployment Rate for Ages 16-24	20%
Unemployment Rate for Ages 25-65	5%

Labor Force

Data 2018 1yr ACS

Source:

Occupations by Sector, Non-entitlement Areas, 2015

Occupations by Sector	Number of People
Management, business and financial	117,721
Farming, fisheries and forestry occupations	24,794
Service	76,012
Sales and office	140,934
Construction, extraction, maintenance and repair	73,969
Production, transportation and material moving	40,973

Occupations by Sector

Data 2011-2015 ACS

Source:

Occupations by Sector Employed population Over 16, Statewide, 2018

Occupations by Sector	Number of People
Management, business and financial	808,107
Farming, fisheries and forestry occupations	36,200
Service	365,744
Sales and office	412,851
Construction, extraction, maintenance and repair	152,516
Production, transportation and material moving	253,603

Occupations by Sector

Data 2018 1yr ACS

Source:

Travel Time – Workers Over 16 who did Not Work from Home

Travel Time	Number	Percentage
< 30 Minutes	1,258,326	68.2%
30-59 Minutes	471,365	25.5%
60 or More Minutes	116,027	6.3%
Total	1,845,718	100.0%

Travel Time

Data 2018 ACS, 1 year estimates

Source:

Education:

Table 47 provides updated data on educational attainment and labor force participation among adults ages 25 and 64.

Statewide Educational Attainment by Employment Status (Population 25 and 64)

Educational Attainment	In Labor Force		Not in Labor Force
	Civilian Employed	Unemployed	
Less than high school graduate	129,570	13,984	74,945

Educational Attainment	In Labor Force		Not in Labor Force
	Civilian Employed	Unemployed	
High school graduate (includes equivalency)	306,898	26,954	139,026
Some college or Associate's degree	555,499	30,190	169,065
Bachelor's degree or higher	639,375	19,933	107,329

Educational Attainment by Employment Status

Data 2018 ACS, 1 year estimates

Source:

Educational Attainment by Age

	Age				
	18–24 yrs	25–34 yrs	35–44 yrs	45–65 yrs	65+ yrs
Less than 9th grade	4,403	14,739	25,871	39,443	26,311
9th to 12th grade, no diploma	44,584	33,925	36,103	68,418	35,115
High school graduate, GED, or alternative	116,892	127,748	105,229	239,902	182,932
Some college, no degree	139,621	152,946	124,050	267,903	199,694
Associate's degree	22,912	54,279	50,363	105,213	59,653
Bachelor's degree	35,131	151,518	126,070	211,853	131,749
Graduate or professional degree	2,202	57,500	89,147	130,549	104,157

Educational Attainment by Age

Data 2018 ACS, 1 year estimates

Source:

Educational Attainment – Median Earnings in the Past 12 Months

Educational Attainment	Median Earnings in the Past 12 Months
Less than high school graduate	\$26,327.00
High school graduate (includes equivalency)	\$31,098.00
Some college or Associate's degree	\$36,161.00
Bachelor's degree	\$51,699.00
Graduate or professional degree	\$69,381.00

Median Earnings in the Past 12 Months

Data 2018 ACS, 1 year estimates

Source:

Based on the Business Activity table above, what are the major employment sectors within the state?

Oregon transitioned from a resource-based economy to a more mixed manufacturing economy, with an emphasis on high technology. The state's high tech sector continues to grow and is centered in the Portland MSA region. Agriculture and tourism remain key industries in greater Oregon, and many communities are working to develop new economic bases. For example, South Coast communities look for opportunities in the emerging "Blue" or maritime economy. Infrastructure to support workforce housing and attract employers is needed.

As illustrated above, the economic sectors that are moving forward as the leading employment sectors include education and healthcare services (23%); professional, scientific, and management services (14%); arts, entertainment, and accommodations (12%); retail trade (11%) and manufacturing (10%).

Describe the workforce and infrastructure needs of business in the state.

The Oregon Employment Department Workforce and Economic Research published projections for Oregon occupations in 2018 and predicted the largest employment growth by 2027 to be in health support occupations (21%), computer and mathematical occupations (19%), healthcare practitioners and technical occupations (18%), personal care and service occupations (17%), and construction and extraction occupations (16%).

According to a survey of 13,800 private employers conducted by the State of Oregon Employment Department, health care employers reported the most vacancies of any industry, while transportation and material moving represented the occupations group with the most vacancies. Personal care aides, heavy and tractor-trailer truck drivers, and registered nurses were among the vacancies reported as most difficult to fill. More than half (59%) of all job vacancies required no education beyond high school while only 7 percent require a bachelor or advanced degree, however higher paying vacancies are more likely to require education beyond high school and experience. More than one-third (37%) of all vacancies in Oregon in the 2019 survey paid less than \$15 per hour.

As mentioned earlier, investments oriented towards increasing Oregon's international and local trade capacities, including building a reliable and resilient transportation and wastewater infrastructure are essential to attract businesses and encourage local growth. Given the large cost of such infrastructure projects and limited municipal resources at the local level, greater financing and technical assistance provision of local infrastructure projects from the state level could encourage economic development especially in rural Oregon.

OBDD-IFA's Strategic Plan for 2018-2022 identified small and middle-market firms as a key economic development opportunity especially for job creation. Rural Oregon communities struggle to provide opportunities for such growth with aging populations and limited infrastructure.

In stakeholder roundtable discussions a lack of affordable workforce housing and a lack of access to broadband Internet are both considered impediments to attracting new employers to rural communities.

Describe any major changes that may have an economic impact, such as planned public or private sector investments or initiatives that have affected or may affect job and business growth opportunities during the planning period. Describe any needs for workforce development, business support or infrastructure these changes may create.

Increases in globalization and automation continue to impact Oregon's manufacturing sectors. Given the state's geographic location and commercial ties to the Pacific Rim, these impacts are felt more acutely in Oregon than many other states. These global macro trends force Oregon manufacturers to be more competitive by increasing productivity and decreasing costs. Export markets include high-tech, food and beverage, and forestry and wood production. Job loss in the forestry and wood production industry has been tied to automation and has impacted rural Oregon communities more than urban communities.

Disparities in income and educational attainment among people of color and other underrepresented communities are growing in the state, and could contribute to decreased economic growth, as these communities continue to be limited in their capacity to contribute to the economy both as producers and consumers.

In 2020, the COVID pandemic and resulting health, economic, and social consequences greatly impacted Oregon's economy statewide. As the state worked to respond to the COVID pandemic, the state experienced its most severe wildfire season in its history. Fires swept across much of Oregon, destroying homes and livelihoods. These twin disasters will have unknown long term economic, social, and health impacts on the people of Oregon. The COVID pandemic heightened awareness of the critical need to expand Internet infrastructure across Oregon, especially to rural low and moderate income areas that are currently unserved.

How do the skills and education of the current workforce correspond to employment opportunities in the state?

As discussed previously, more than half (59%) of all job vacancies required no education beyond high school while only 7 percent required a bachelor or advanced degree. Higher paying vacancies are more likely to require education beyond high school and experience. To increase

the quality of life for Oregon residents, wages must increase through the creation of higher paying jobs with accompanying skills training and education to match the needs of those jobs. In the survey, job vacancies that required bachelors or advanced degrees had average hourly wages of over \$30 per hour. These jobs with vacancies requiring higher degrees were more likely to be full-time and permanent, providing greater stability.

Describe current workforce training initiatives supported by the state. Describe how these efforts will support the state's Consolidated Plan.

Business Oregon offers customized workforce training. When businesses or industries contact the agency about specialized workforce needs, they are connected with community colleges who then provide customized training, either on campus or at the business site. In addition, the state's Small Business Development Centers, which are located near community colleges, provide consulting services, workshops, and assistance with business plans. These services will continue and are critical to supporting the economic development goals in this plan including facilitating the recovery from the COVID-19 pandemic.

Describe any other state efforts to support economic growth.

Other plans to innovate Oregon's economy from OBDD-IFA's Strategic Plan include expanding the state researched development capacity with attempts to increase access to capital for start-up companies and advance the economic opportunities of underrepresented people by connecting these communities with jobs and fostering wealth creations. This includes increasing number and value of public contracts awarded COBID certified firms as well as business development services for such firms.

Discussion

Oregon faces a range of challenges related to non-housing community development assets, which were exacerbated by multiple crises during 2020. Global positioning in the trade of natural resources and high-tech services present great economic opportunity with the increased risk of exposure to macro changes in the global market. Locally oriented investments in infrastructure and job training, as well as access to capital, could improve and diversify the economy especially in rural areas. Higher educational attainment will likely help Oregon residents achieve higher income and stability, however there are also many unmet job vacancies among lower paid and potentially part time employment opportunities.

MA-50 Needs and Market Analysis Discussion

Are there areas where households with multiple housing problems are concentrated? (include a definition of "concentration")

People of color, persons with disabilities, and households living in poverty are disproportionately more likely to have housing problems, experience housing instability, and risk of homelessness.

Other than on reservations, concentrations of people of color are mostly in entitlement areas.

Concentrations of persons with disabilities are found throughout the state. For disability, concentration is defined as Census tracts that have 10 percentage points higher proportions of persons with disabilities than the state overall. Those Census tracts are mostly in nonentitlement areas and areas that are very rural and are aging. These concentrated areas are clustered in the South Central, northeast, along the coast, and near reservations. The concentration analysis was confirmed by stakeholder focus groups. For example, stakeholders in the South Central part of the state described significant housing problems due to blight, poor housing conditions, and lack of new development.

Concentrations of households with incomes of less than 30 percent AMI—the vast majority of which face housing problems—are predominantly in rural area of the state. According to CHAS data, compared to other household types, extremely low income families are most likely to have housing problems in Oregon: 80 percent of extremely low income renters (<30% AMI) experience housing problems. Outside of urban areas, concentrations exist south of Gresham and on the Warm Springs Reservation. Concentration is defined as areas that have 20 percentage points higher populations with incomes lower than 30 percent AMI than the state overall (13%).

Are there any areas in the jurisdiction where racial or ethnic minorities or low-income families are concentrated? (include a definition of "concentration")

The 2021 Analysis of Impediment to Fair Housing Choice (AI) analyzes concentrations by race and ethnicity, in addition to residents with Limited English proficiency, and persons living in poverty.

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
- Tracts that are more than 20 percent minority—minority residents defined as those identifying as Hispanic/Latino and/or a non-White race.

Poverty concentrations are defined as those areas where poverty exceeds three times the county percent.

Concentrations by Race or Ethnicity

Racial and ethnic concentrations are shown in the following maps. In sum,

Concentrations of persons of Hispanic descent

- There are 28 Hispanic-concentrated Census tracts throughout the state—slightly fewer than in 2013 when there were 33 concentrated tracts; and
- Clusters of Hispanic-concentrated Census tracts exist in the greater Portland area (including Gresham and Wood Village), Hillsboro, Cornelius, Beaverton, around Woodburn, Salem, near Hood River, and outside Klamath Falls.

Black or African American concentrations

- There are no Black or African American-concentrated Census tracts in the state. In the 2013 AI, three Census tracts were identified as concentrated;

Asian concentrations

- There are seven Asian-concentrated Census tracts throughout the state—two more than in 2013 (when there were 5); and
- Four Census tracts are in Washington County: Three are in Bethany, north of Hillsboro and Beaverton, and one is in Beaverton.

Native American concentrations

- There are two Native American-concentrated Census tracts throughout the state, the same as in 2013; and
- Both are Census tracts located within an American Indian Reservation (Warm Springs Reservation and Umatilla Reservation).

Hispanic Concentration by Census Tract, State of Oregon, 2018

Note:
The statewide proportion is 13%.

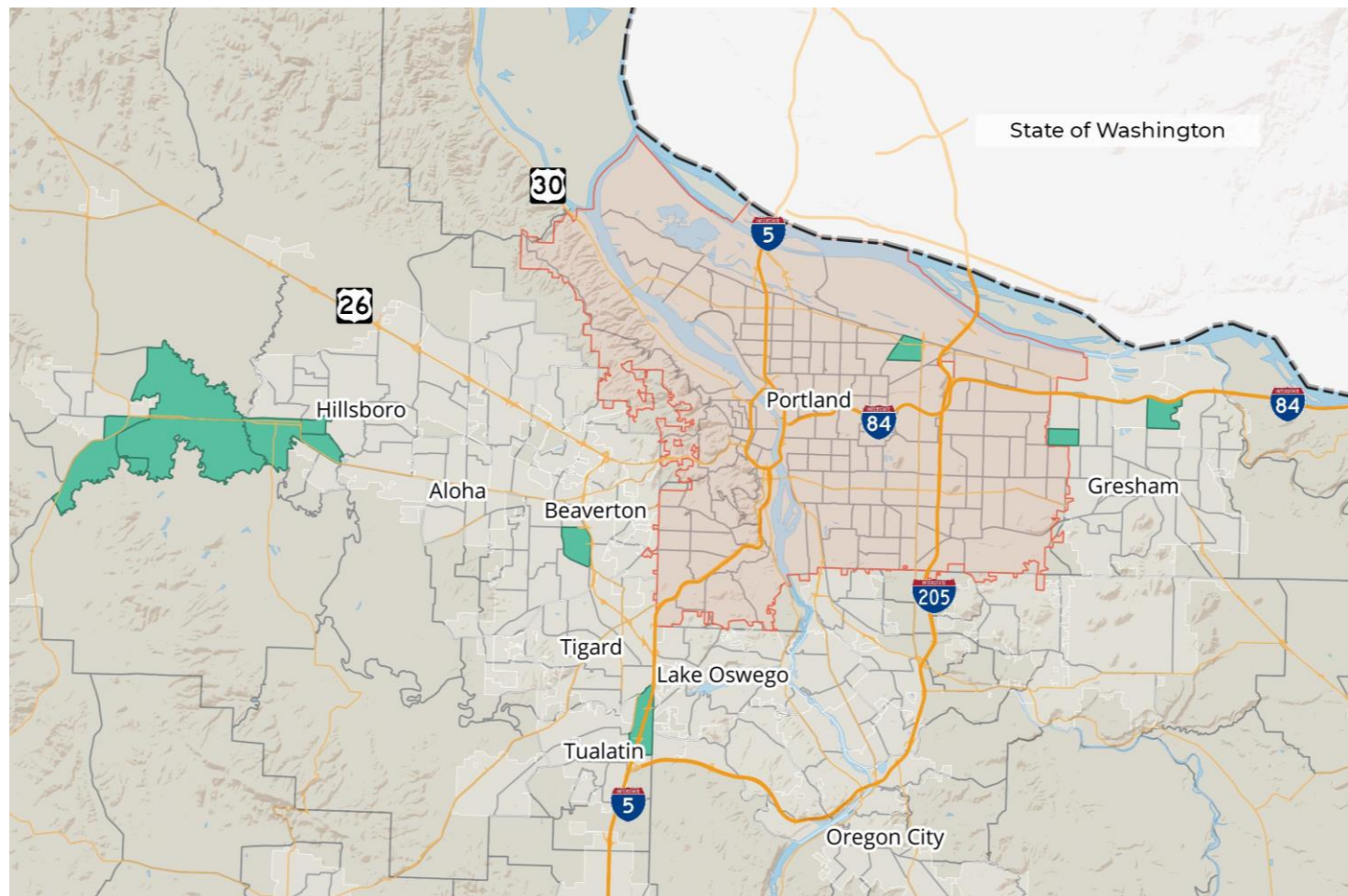
Source:
2018 5 year ACS estimates and Root Policy Research




Hispanic Concentration by Census Tract, Greater Portland Area, 2018

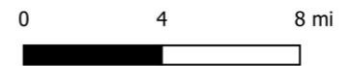
Note:
The statewide proportion is 13%.

Source:
2018 5 year ACS estimates and Root Policy Research



Concentration of Hispanic Residents

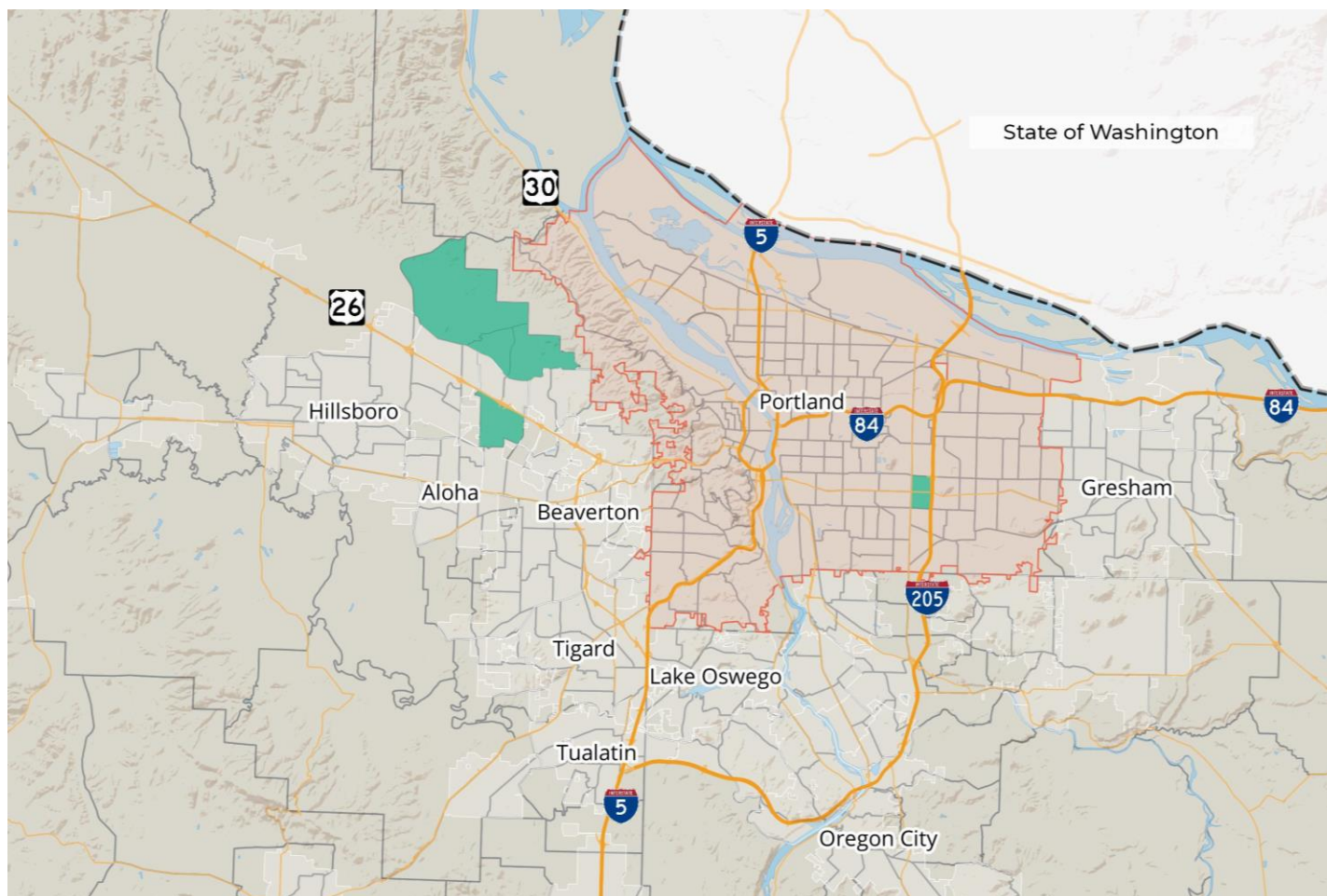
 Tract concentration is 20 percentage points more than the respective county proportion



Asian Concentration by Census Tract, Greater Portland Area, 2018

Note:
The statewide proportion is 5%.

Source:
2018 5 year ACS estimates and Root Policy Research.



Concentration of Asian Residents

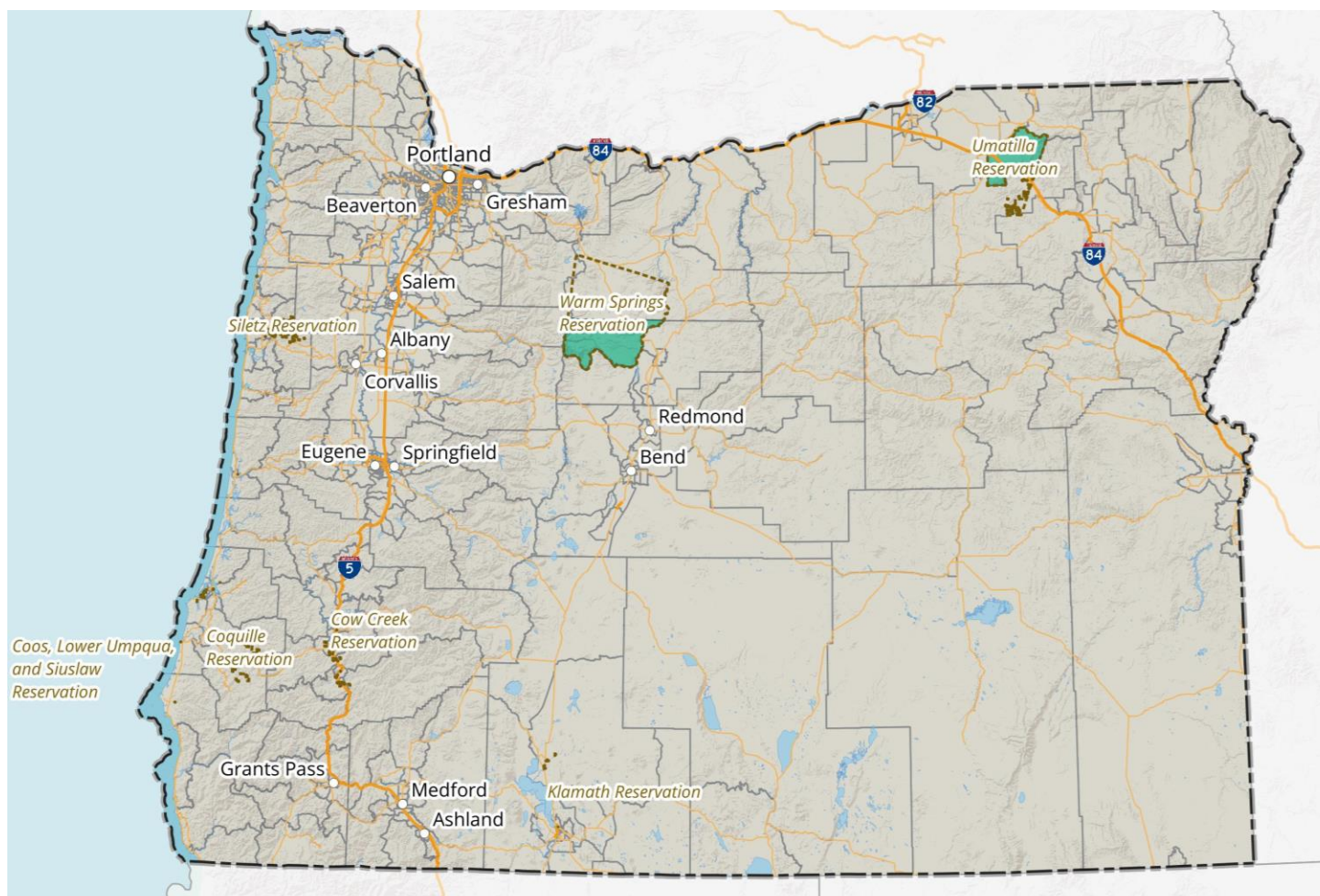
 Tract concentration is 20 percentage points more than the respective county proportion



American Indian/Alaskan Native Concentration by Census Tract, State of Oregon, 2018

Note:
The statewide proportion is 1%.

Source:
2018 5 year ACS estimates and Root Policy Research.



Concentration of American Indian/Alaskan Native Residents

Tract concentration is 20 percentage points more than the respective county proportion

Native American Areas



Majority people of color. The following maps show the location of the 42 Census Tracts in the state where people of color make up the majority of the population. These tracts represent an increase of 11 Census tracts; there were 31 identified in the 2013 AI report.

A large number of majority people of color Census tracts exist in the greater Portland area, in nearby Hillsboro, and in the Salem area.¹

Despite the comparatively large Hispanic population in Oregon, only 12 of the 42 majority Census tracts have Hispanic populations over 50 percent, meaning the remaining Census tracts are a combination of people of color,² with the exception of one census tract that has a Native American population over 50 percent.

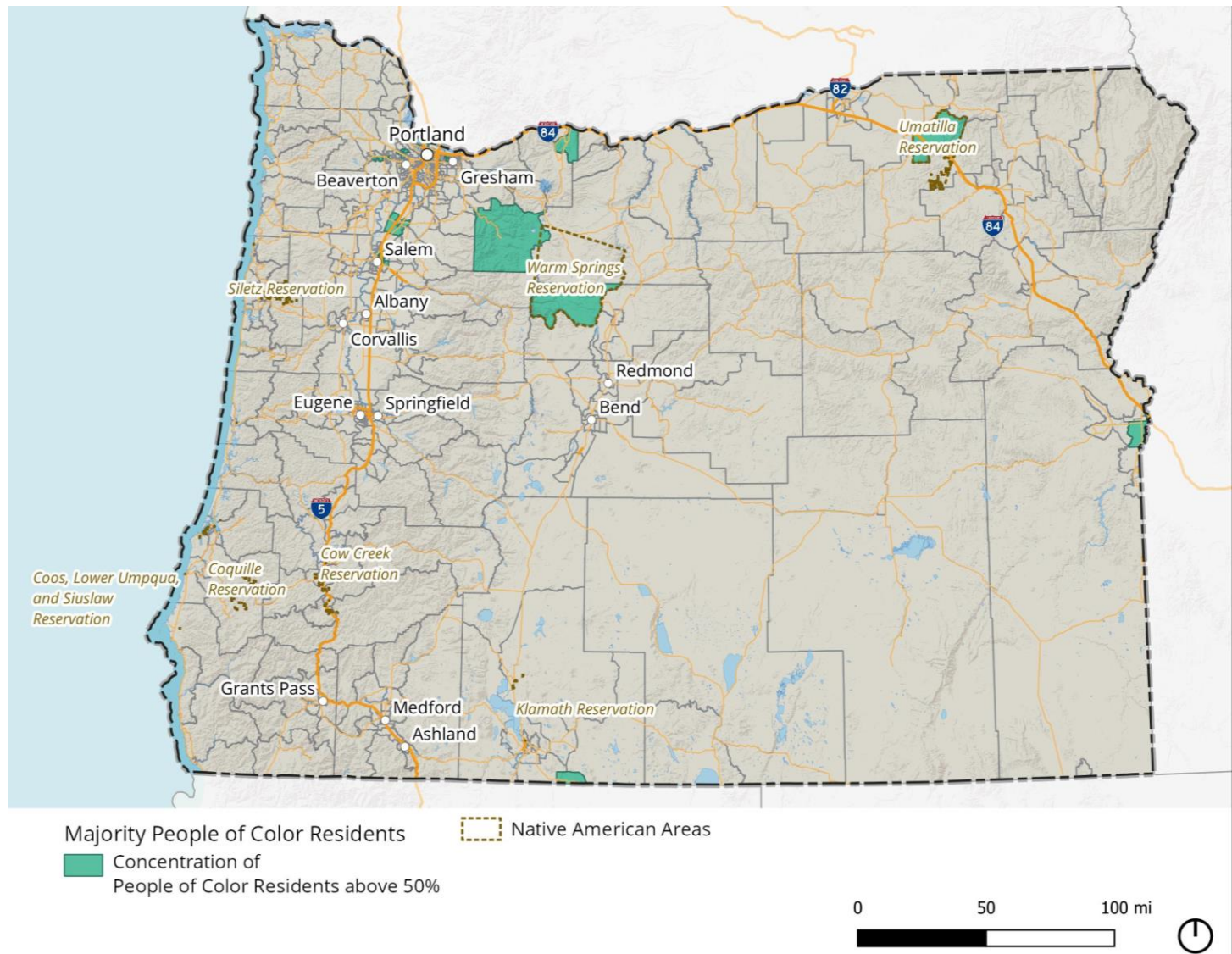
¹ While the four majority people of color Census tracts located in the Woodburn area (north of Salem along I-5) are all Hispanic concentrated areas, Woodburn also contains a significant Russian Orthodox population. Russian Orthodox residents, however, would not contribute to the count if they self-identify as White in U.S. Census Bureau surveys.

² Other races and multiple races are included in people of color.

Majority People of Color Census Tracts, State of Oregon, 2018

Note:
People of color are residents who do not identify as non-Hispanic White.

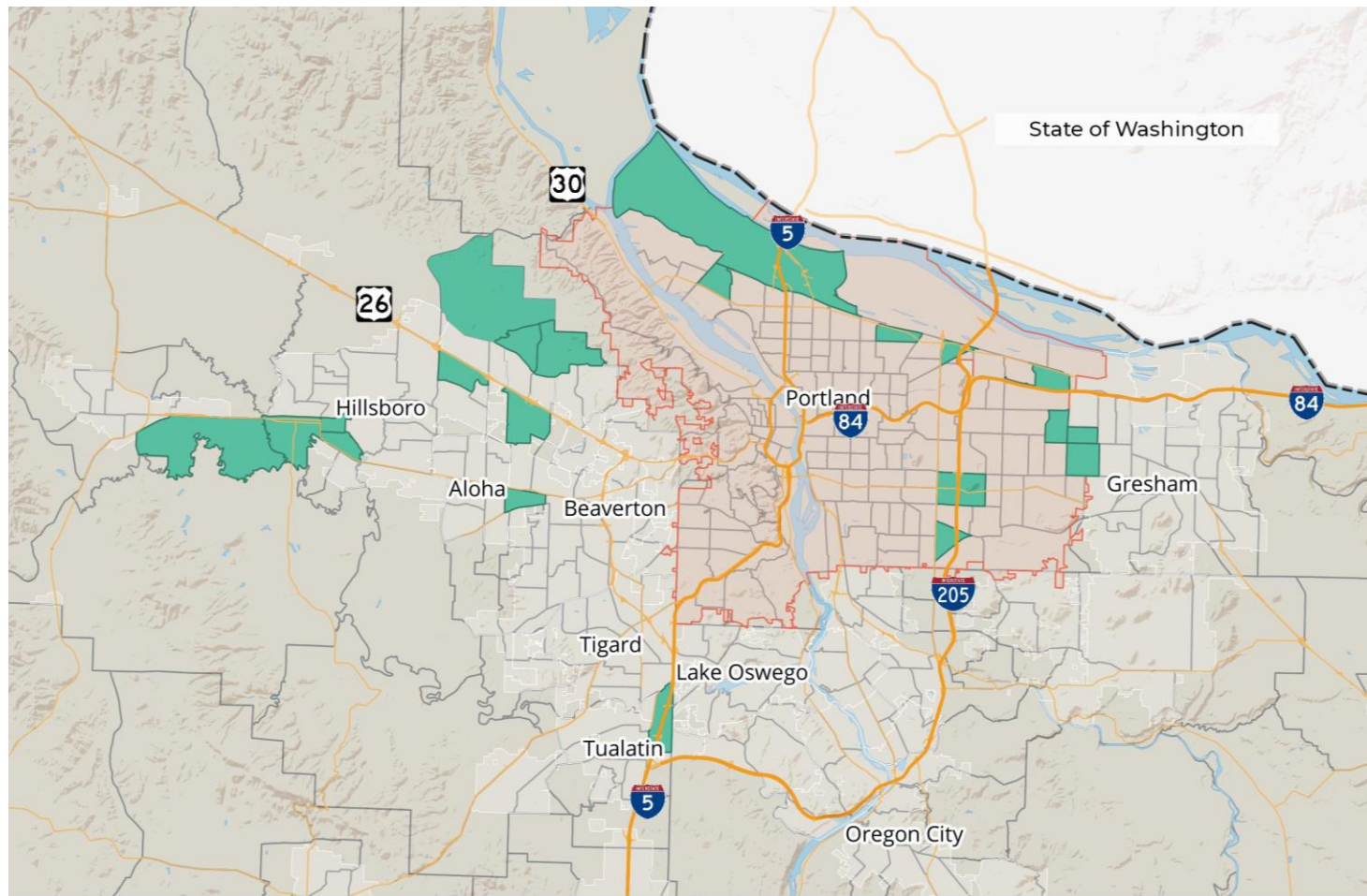
Source:
2018 5 year ACS estimates and Root Policy Research.



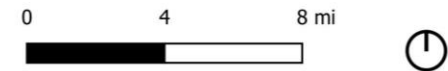
Majority People of Color Census Tracts, Greater Portland Area, 2018

Note:
People of color are residents who do not identify as non-Hispanic White.

Source:
2018 5 year ACS estimates and Root Policy Research.



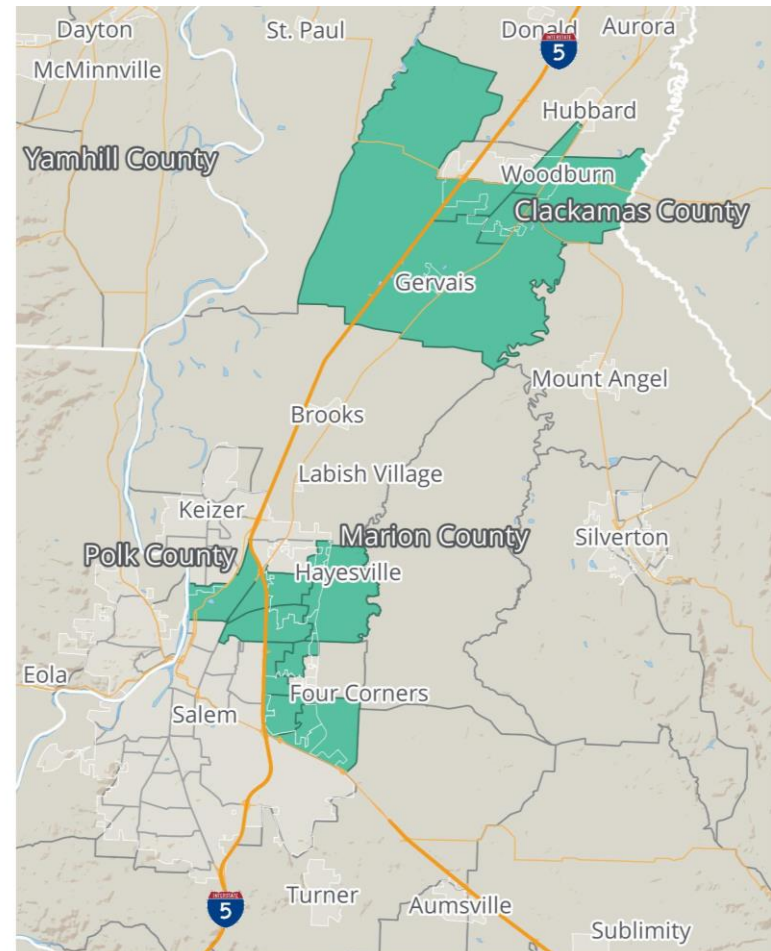
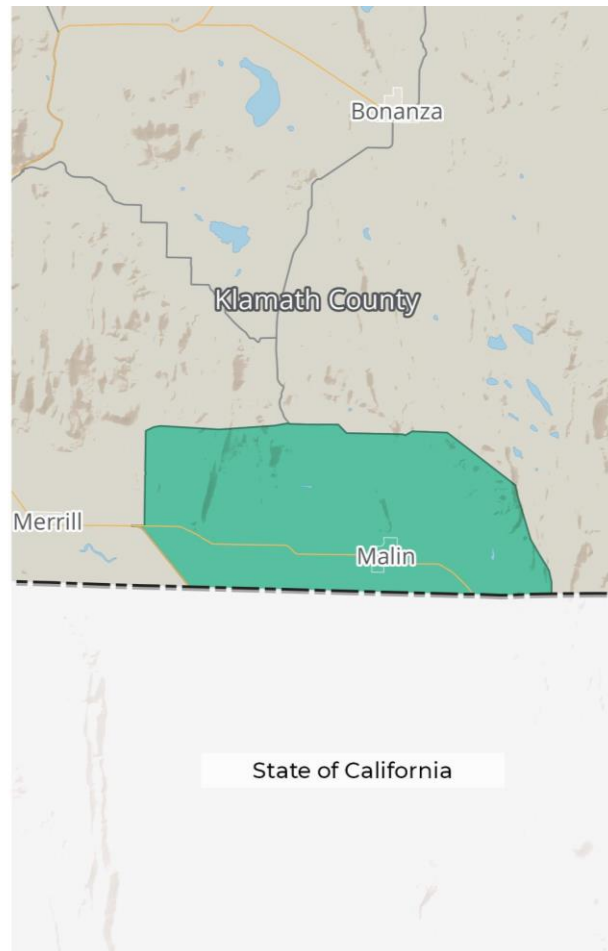
Majority People of Color Residents
■ Concentration of People of Color Residents above 50%



Majority People of Color Census Tracts, Greater Salem Area and Greater Malin Area, 2018

Note:
People of color are residents who do not identify as non-Hispanic White.

Source:
2018 5 year ACS estimates and Root Policy Research.



Majority People of Color Residents
 Concentration of People of Color Residents above 50%



Concentrations of residents with Limited English Proficiency (LEP)

Overall, six percent of Oregon residents speak English “Less than very well,” as self-reported in the Census surveys, and there are Census tracts where the population of LEP residents is concentrated—20 percentage points above the county rate. As shown in the following map, these Census tracts are located in the greater Portland area, along I-84 and the Columbia River in the agricultural area near the town of Hood River and encompassing the town of Odell in Hood River County.

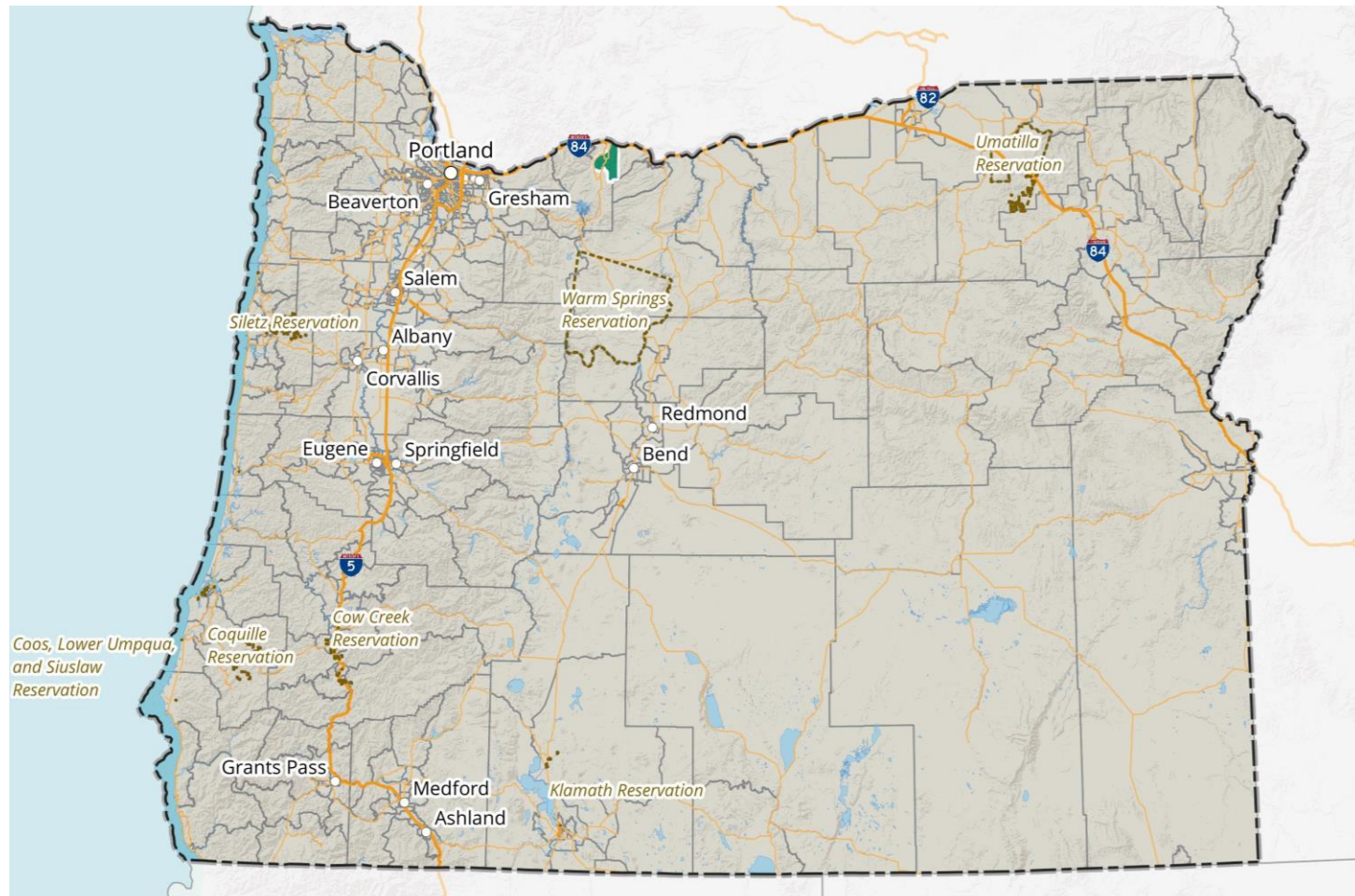
Concentration of Limited English Proficiency Individuals, State of Oregon, 2018

Note:

Limited English Proficiency (LEP) is defined as an individual who does not speak English as a first language and has speaks English less than "Very Well". The statewide proportion of LEP residents is 6%.


Source:

2018 5 year ACS estimates and Root Policy Research.



 Native American Areas

Concentration of Limited English Proficiency Individuals

 Above 26%
(20 percentage points more than state proportion)

0 50 100 mi



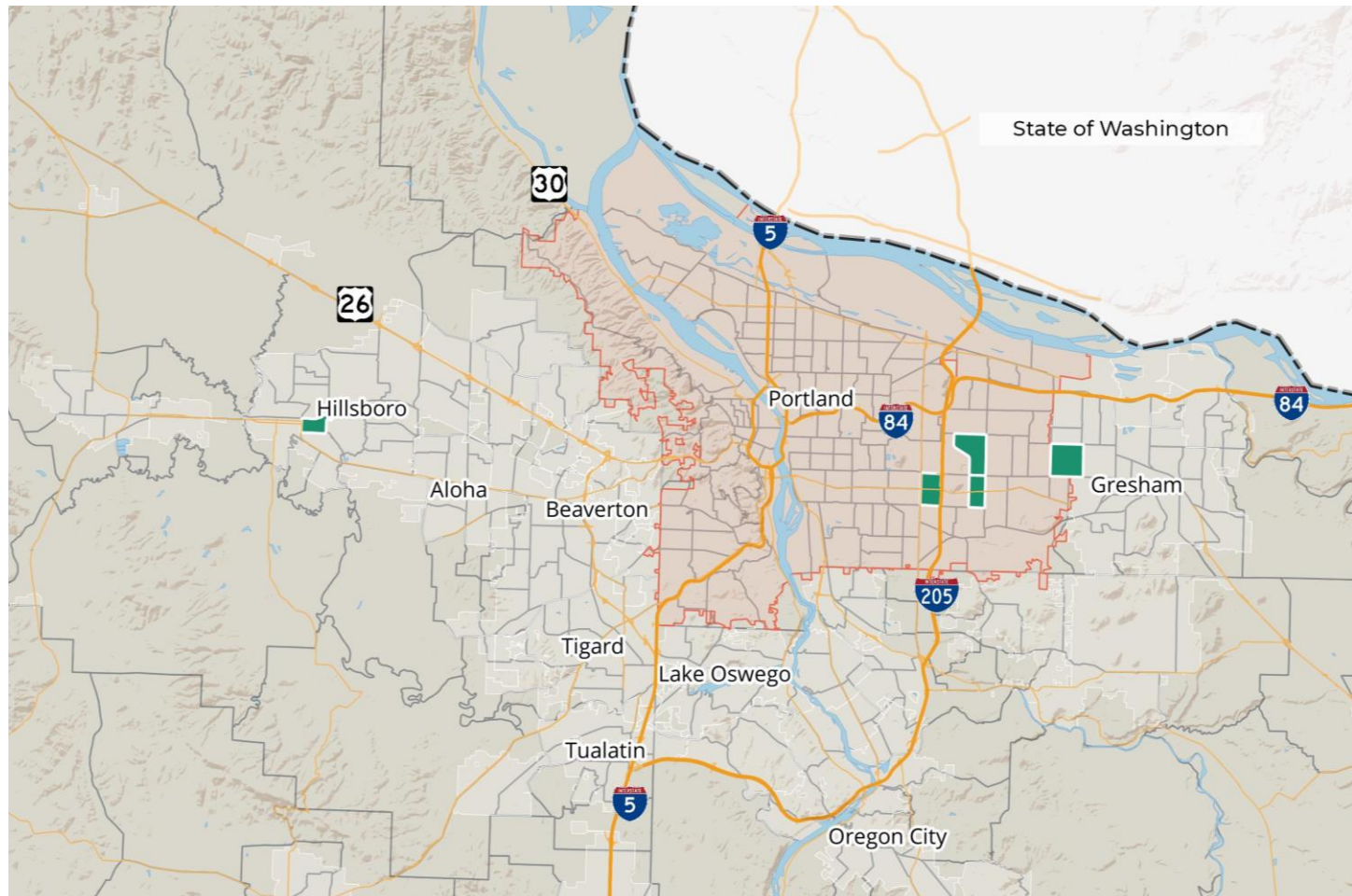
Concentration of Limited English Proficiency Individuals, Greater Portland Area, 2018

Note:

Limited English Proficiency (LEP) is defined as an individual who does not speak English as a first language and speaks English less than "Very Well". The statewide proportion of LEP residents is 6%.

Source:

2018 5 year ACS estimates and Root Policy Research.



Concentration of Limited English Proficiency Individuals

■ Above 26% (20 percentage points more than state proportion)



Concentrations of Persons with Disabilities

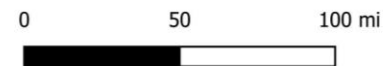
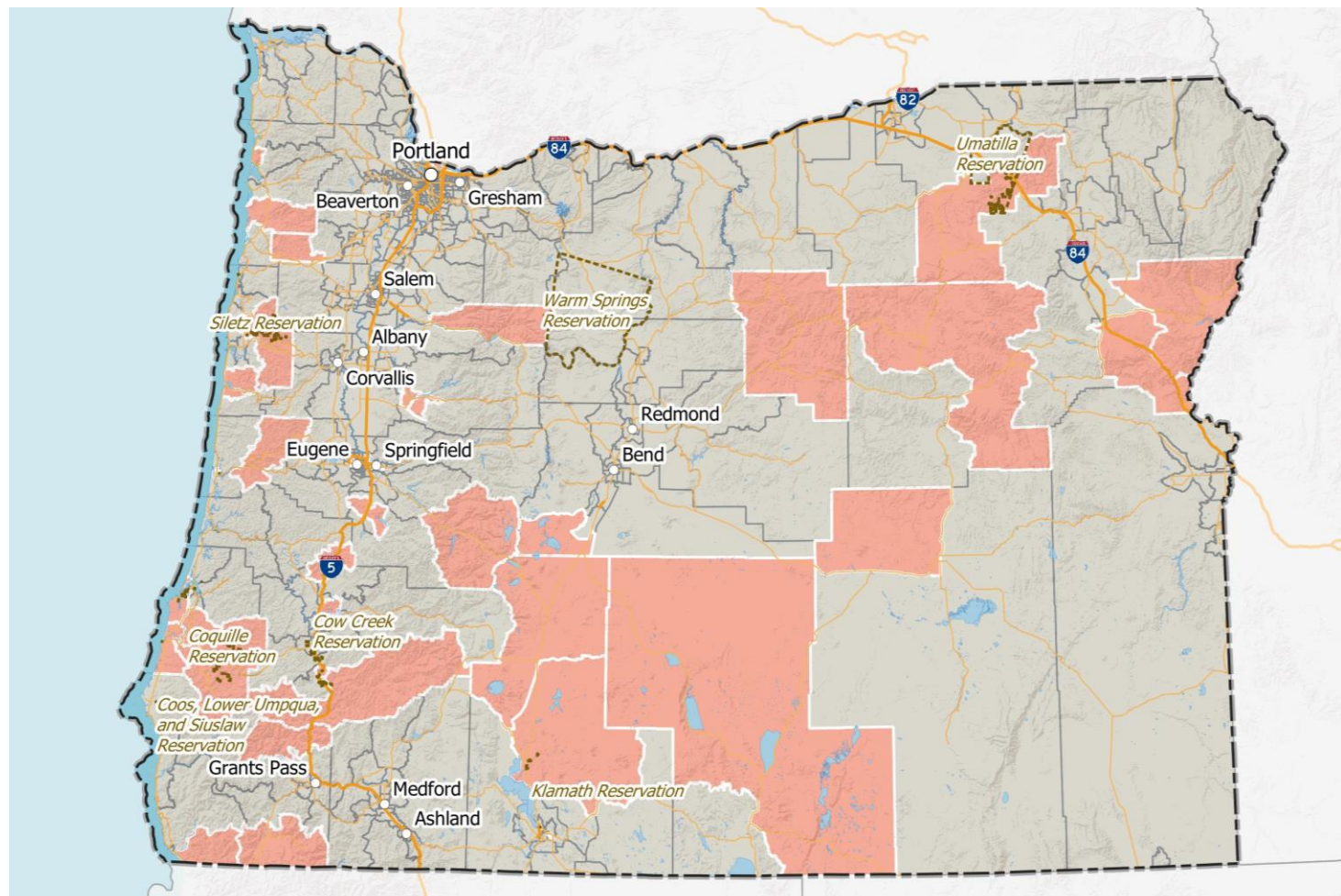
The following maps show concentrations of persons with disabilities, defined in this analysis as more than 34 percent (20 percentage points above statewide rate) of individuals in a Census tract. There are two Census tracts with concentrations of residents with disabilities, one in coastal city of Florence and one in the city of Portland.

The maps also show areas where the percentage of residents with a disability is 10 percentage points above the state proportion. These are not concentrations by the working definition, yet have higher-than-statewide proportions of residents with disabilities and, given the state's rapidly aging population, are notable.

Concentration of Persons with Disabilities by Census Tract, State of Oregon, 2018

Note:
The statewide proportion of persons with disabilities is 14%.

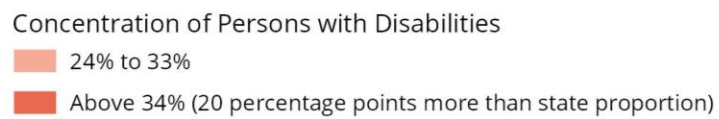
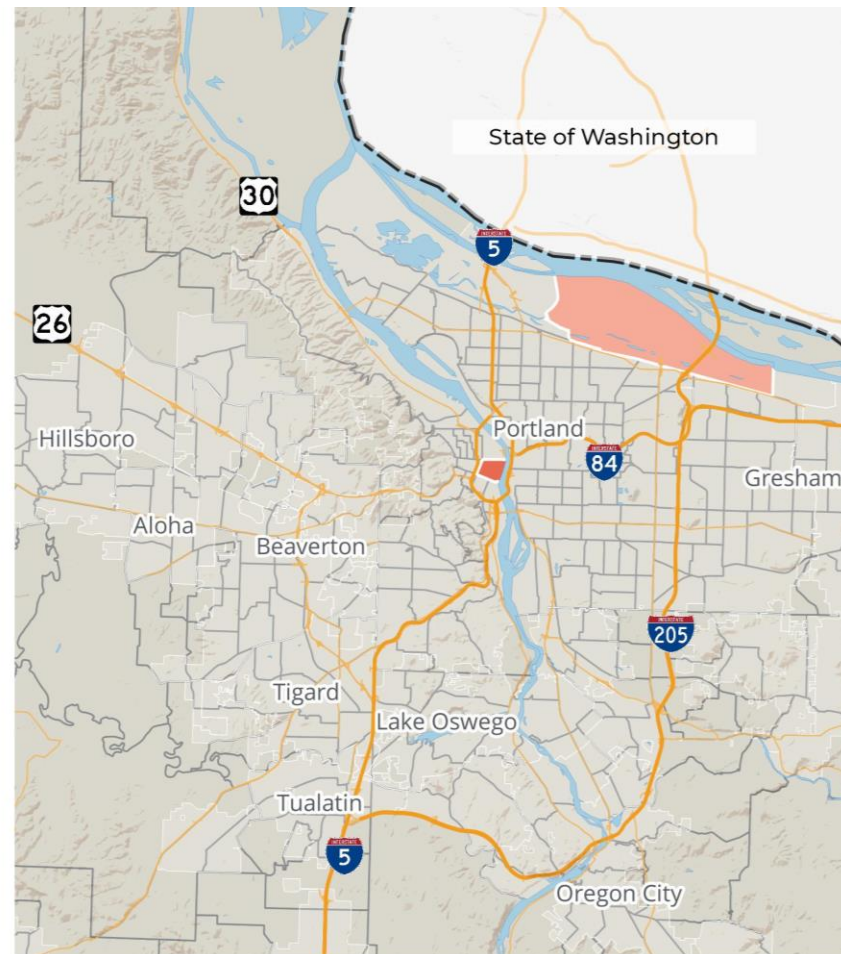
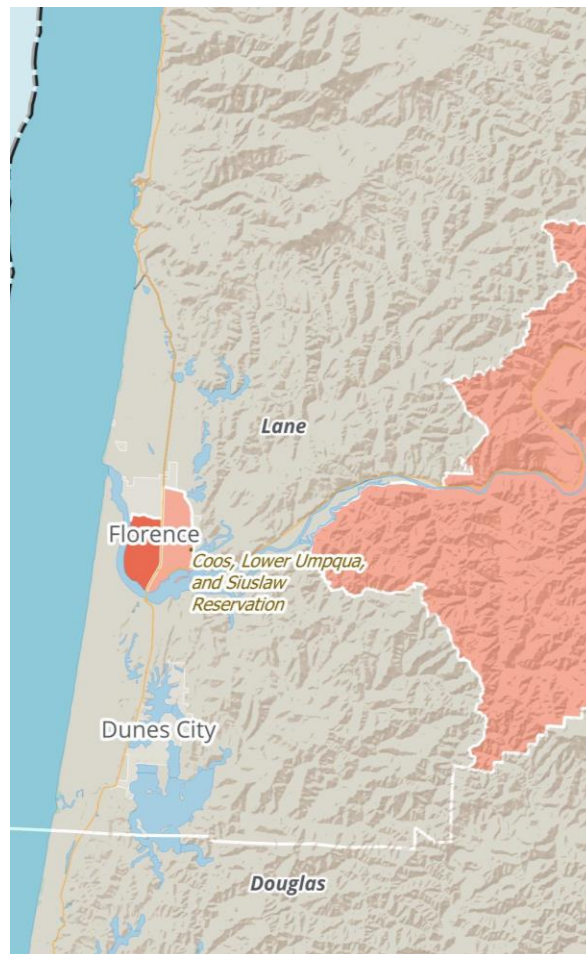
Source:
2018 5 year ACS estimates and Root Policy Research.



Concentration of Persons with Disabilities by Census Tract, Willamette Valley and Greater Portland Area, 2018

Note:
The statewide proportion of persons with disabilities is 14%.

Source:
2018 5 year ACS estimates and Root Policy Research.



0 4 8 mi



Poverty Concentration

The economic ability to rent or purchase housing is a strong determinant of where one lives within a community. Statewide, about 13 percent of individuals live in poverty. The following maps show poverty concentrations (poverty rate of 33% and above) as well as areas with higher-than-statewide poverty (13% to 32%).

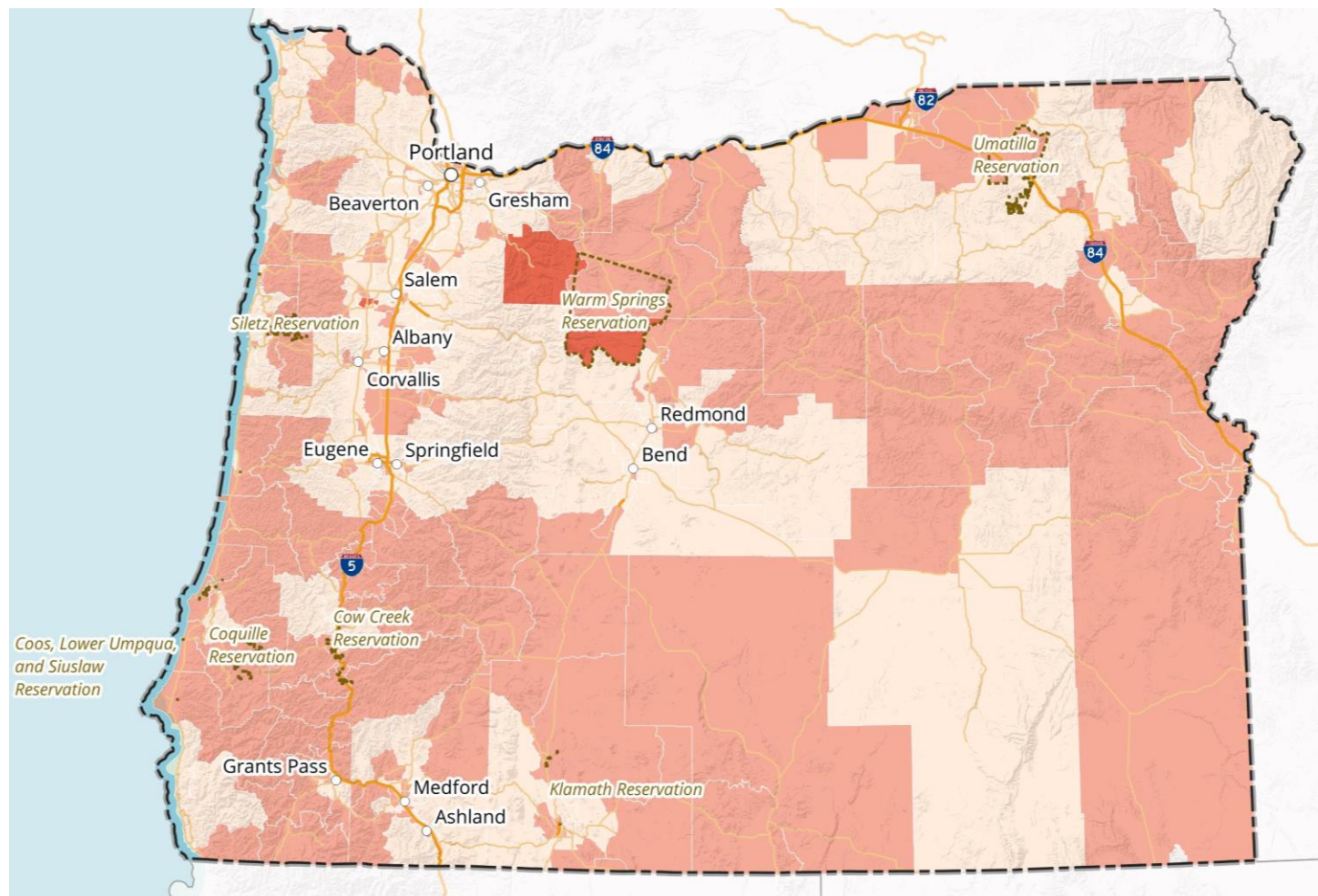
Areas of concentrated poverty exist south of Gresham and on the Warm Springs Reservation, within the Portland MSA, and in Eugene, Corvallis, and the Monmouth/Independence areas, where the presence of college students influences poverty statistics.

Census tracts with comparatively high poverty rates are predominantly located in rural areas.

Concentrations of Individuals Below Poverty by Census Tract, State of Oregon, 2018

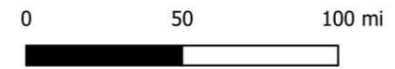
Note:
The statewide poverty rate is 13%.

Source:
2018 5 year ACS estimates and Root Policy Research.



Concentration of Individuals Below Poverty

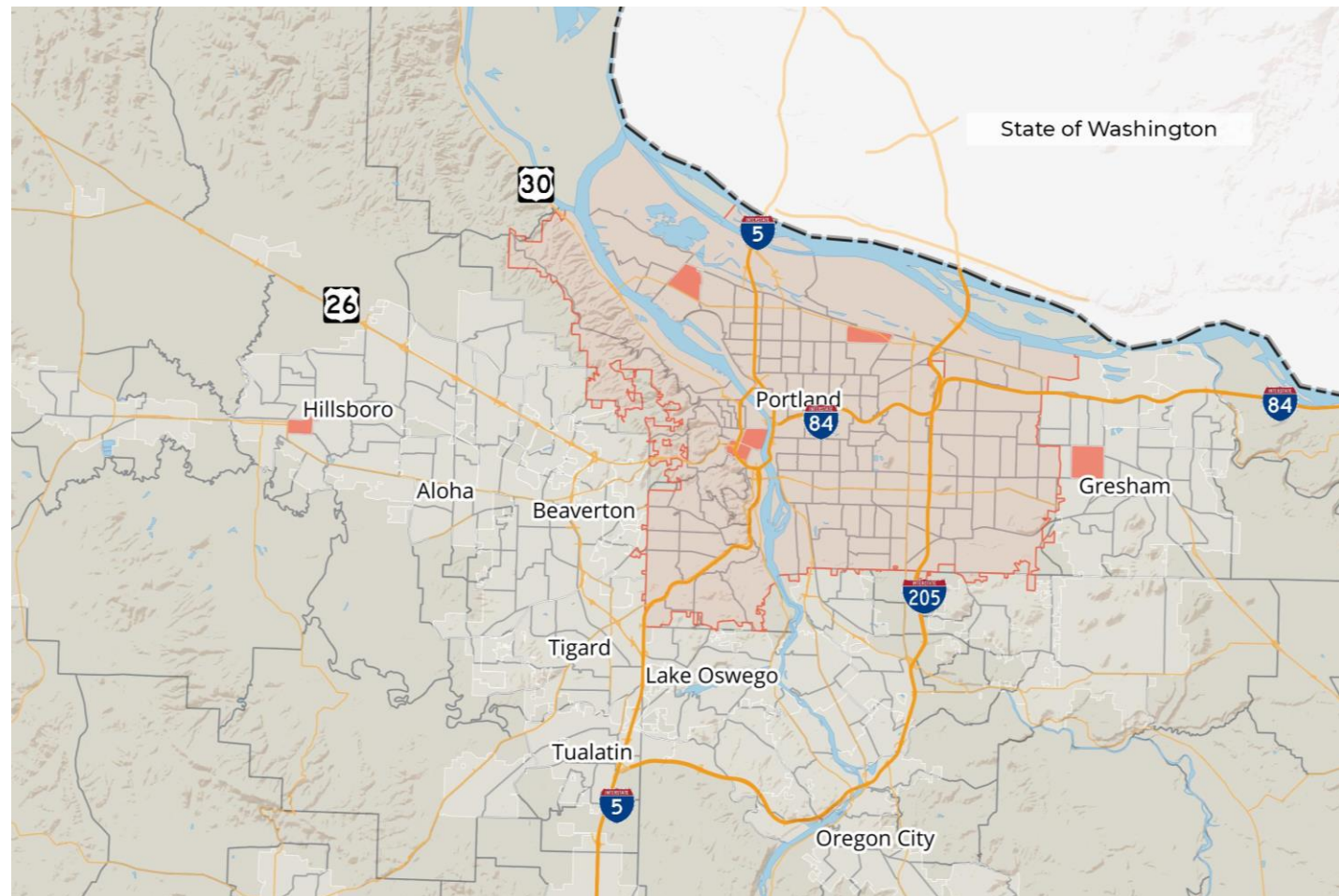
- 0 - 12%
- 13 - 32%
- Above 33% (20 percentage points more than state proportion)



Concentrations of Individuals Below Poverty by Census Tract, Greater Portland Area, 2018

Note:
The statewide poverty rate is 13%.

Source:
2018 5 years ACS estimates and Root Policy Research.



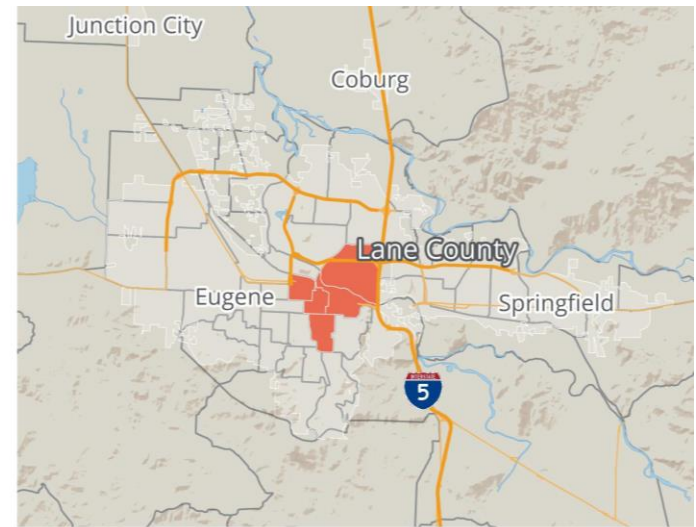
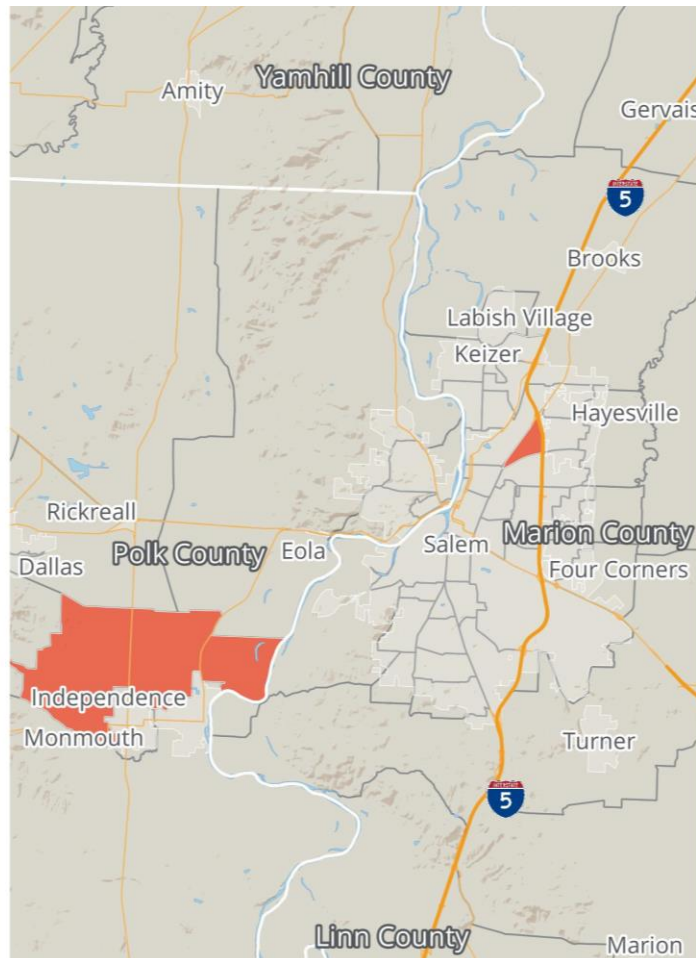
Concentration of Individuals Below Poverty
Above 33% (20 percentage points more than state proportion)



Concentrations of Individuals Below Poverty Rate, Independence, Salem, Eugene, and Corvallis, 2018

Note:
The statewide poverty rate is 13%.

Source:
2018 5 years ACS estimates and Root Policy Research.



Concentration of Individuals Below Poverty
■ Above 33% (20 percentage points more than state proportion)



What are the characteristics of the market in these areas/neighborhoods?

The statewide analysis is too broad to provide neighborhood level assessments of market conditions. As noted above, however, high-poverty concentrations occur in communities with large populations of college students, on and near Tribal lands, and in some urban area neighborhoods. Moderate-poverty areas and persons with disabilities are more prevalent in rural areas.

Racially/Ethnically Concentrated Areas of Poverty (RECAP)

Statewide, seven Census tracts in Oregon meet the definition of a racially/ethnically concentrated areas of poverty (RECAPs). There are four R/ECAP Census tracts in the Portland MSA region including two within Portland’s city boundaries. In Washington County, there is one in Hillsboro and one shared between Tualatin, Tigard, and Durham. There are two other urban R/ECAP designated Census tracts, one in Eugene (Lane County) near the university and one in downtown Medford (Jackson County). Finally, there is one rural Census tract in Clackamas County adjacent to the Warm Springs Reservation.

R/ECAP Census Tract Characteristics

	Total Population	People of Color	Hispanic	Black	Families with Children	Persons with Disabilities	LEP
	Num.	%	%	%	Married Single Mother	%	%
Clackamas County							
Census Tract 9800	75	67%	51%	0%	0%	0%	15%
Jackson County							
Census Tract 1	1,991	45%	39%	1%	10%	19%	10%
Lane County							
Census Tract 38	8,687	29%	9%	2%	1%	3%	5%
Multnomah County							
Census Tract 74	4,236	59%	31%	18%	18%	16%	14%
Census Tract 106	3,144	26%	8%	9%	1%	0%	7%
Washington County							
Census Tract 320.05	4,875	54%	44%	1%	14%	12%	13%
Census Tract 324.09	5,366	75%	72%	1%	26%	31%	37%

Data Source: 2014-2018 ACS, 5 year estimates

Are there any community assets in these areas/neighborhoods?

With the exception of the rural Census tract in Clackamas County adjacent to the Warm Springs reservation, the R/ECAP designated areas are primarily in urban centers. Those entitlement community plans, listed below, may provide more detailed information on the nature of community assets in R/ECAPs.

Clackamas County:

<https://dochub.clackamas.us/documents/drupal/0b928756-9c92-44f1-9517-13b6ce5401a7>

Medford, Oregon (Jackson County):

[http://www.ci.medford.or.us/SIB/files/Planning/2020-2024%20Medford%20Consolidated%20Plan Action%20Plan%20\(final\).pdf](http://www.ci.medford.or.us/SIB/files/Planning/2020-2024%20Medford%20Consolidated%20Plan%20Action%20Plan%20(final).pdf)

Eugene-Springfield, Oregon (Lane County):

<https://www.eugene-or.gov/DocumentCenter/View/52889/Eugene-Springfield-Con-Plan-2020-Full-Document?bidId=>

Portland, Oregon (Multnomah County):

<https://www.portlandoregon.gov/phb/article/670036>

Washington County:

<https://s3.amazonaws.com/washcomultimedia/assets/final-volume-2-of-the-2015-2020-consolidated-plan.pdf>

Are there other strategic opportunities in any of these areas?

The statewide analysis is too broad to provide a neighborhood level assessment. We look to the Consolidated Plans of these communities to provide analysis.

MA-60 Broadband Needs of Housing occupied by Low- and Moderate-Income Households - 91.210(a)(4), 91.310(a)(2)

Describe the need for broadband wiring and connections for households, including low- and moderate-income households and neighborhoods.

Statewide, 83 percent of households have a desktop computer and 86 percent have a smartphone. Seventy-two percent of households have broadband access by cable, fiber, or DSL while 88 percent have broadband of any kind. Over 191,000 households (12%) have no Internet subscription and over 173,000 households (11%) only have internet through a cellular data plan.

Oregon’s Broadband Advisory Council, established by the legislature in 2009, leads the Oregon Broadband Mapping Project. As shown in the following figure, much of central and eastern Oregon does not have broadband service, and maximum download speeds in these areas ranges from less than 1 Mbps to 10 Mbps.

Respondents to both stakeholder surveys believe there are barriers to digital/broadband access in their service area, as shown in the figure below.

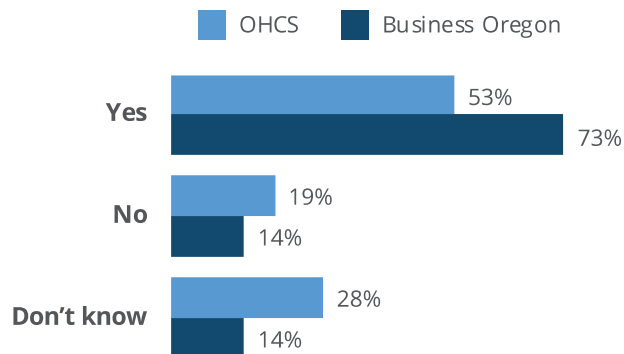
Are there barriers to Digital/Broadband access in your service area?

Note:

n=78 OHCS. N=40 OBDD-IFA.

Source:

Root Policy Research from the 2020 OHCS Housing Stakeholder Survey and the 2020 OBDD-IFA Community Development Stakeholder Survey.



The greatest proportion of community and economic development stakeholders consider the primary barriers to digital broadband access to be a lack of availability in rural areas, while the greatest proportion of housing and human services stakeholders identify unaffordable service to be the primary barrier. In general, the primary barriers identified by both groups of stakeholders center on lack of availability, service that is available but unaffordable, and lack of affordable devices to access the Internet.

As discussed previously, Internet infrastructure to bring broadband access to Oregon communities and last-mile connections to low and moderate income neighborhoods is a one of the most urgent community development needs identified by stakeholders. The COVID pandemic brought the need for broadband access to the forefront. OBDD-IFA has begun to respond to these critical needs by directing some of the state’s CDBG-CV allocations to provide Internet access to low and moderate income families—with the hope that increased reliance on broadband services, and therefore increased demand demonstrated by the COVID crisis, will reduce the financial barriers that prevent the private sector from developing broadband capacity in rural areas.

Access to Computers

Type of Computer	Number	Percentage
Desktop or laptop	1,359,550	82.90%
Smartphone	1,413,126	86.17%
Tablet or other wireless computer	1,064,145	64.89%
Other computer	41,063	2.50%
No computer	91,127	5.56%

Data 2018 ACS, 1 year estimates

Source:

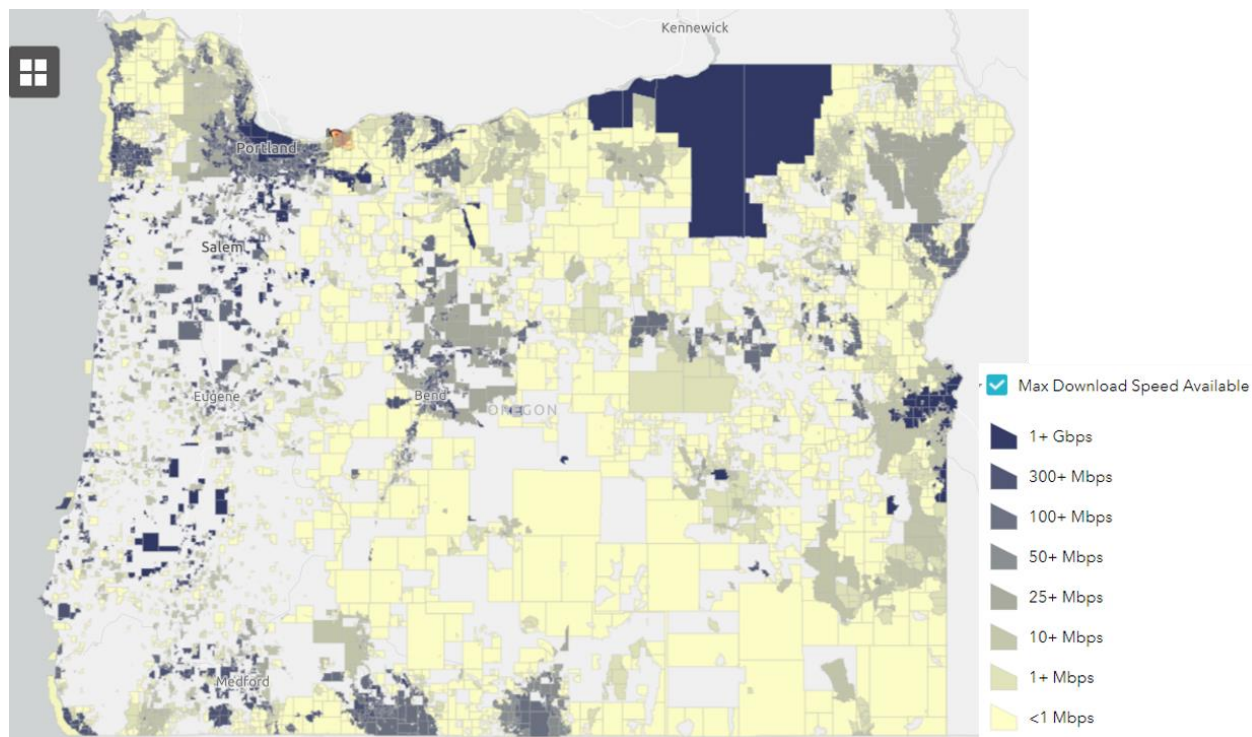
Access to Broadband Internet

Type of Internet	Number	Percentage
Broadband of any type	1,441,775	87.91%
Broadband such as cable, fiber, or DSL	1,186,518	72.35%
Satellite Internet service	116,128	7.08%
Cellular data plan, no other Internet	173,707	10.59%
Dial-up	6,209	0.38%
Without an Internet subscription	191,986	11.71%

Data 2018 ACS, 1 year estimates

Source:

Internet Download Speed



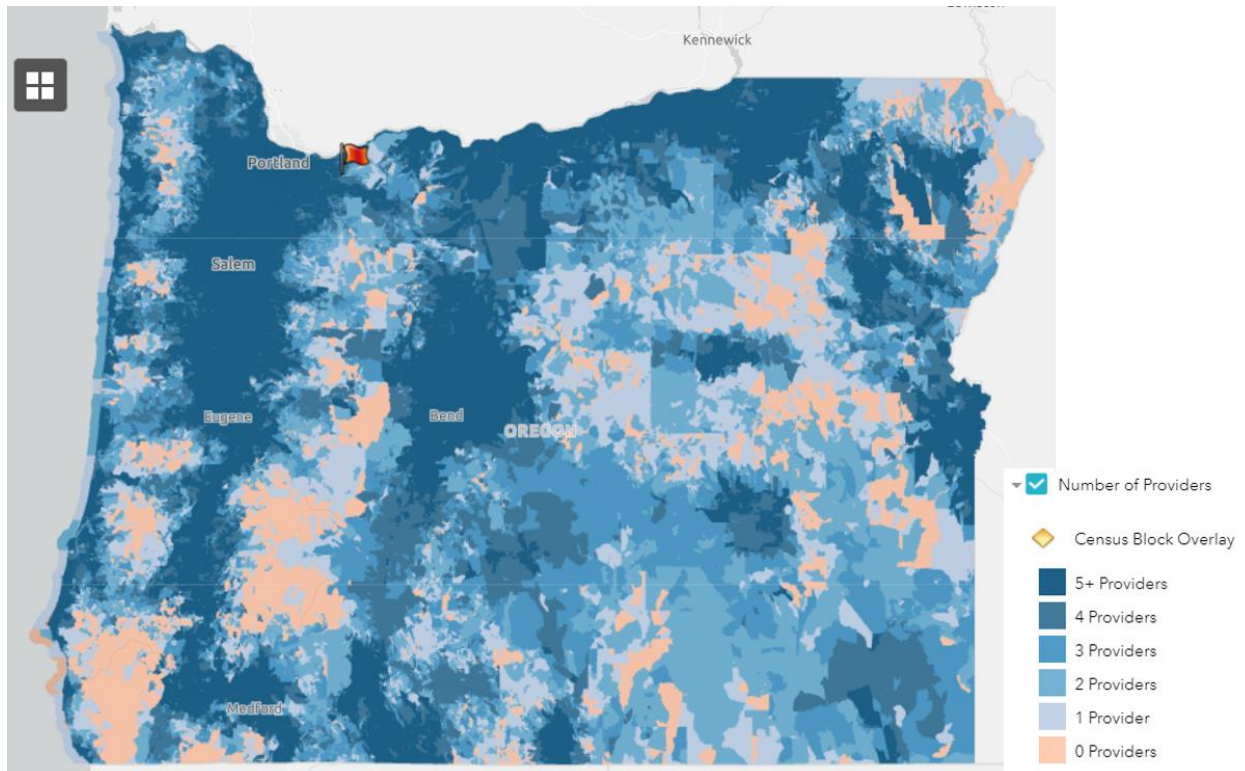
Data Oregon Broadband Mapping Project, November 2020.

Source: <https://www.oregon4biz.com/Broadband-Office/Interactive-Map/Map/>

Describe the need for increased competition by having more than one broadband Internet service provider serve the jurisdiction.

According to the Federal Communications Commission database, Oregon has a range of access to competitive broadband markets. Many rural Census tracts have access to only one or two potential service providers, while most urban Census tracts have access to four or more providers. More competition in rural areas and coverage in areas currently lacking a provider could increase quality of access and decrease costs for those residents not living in urban areas.

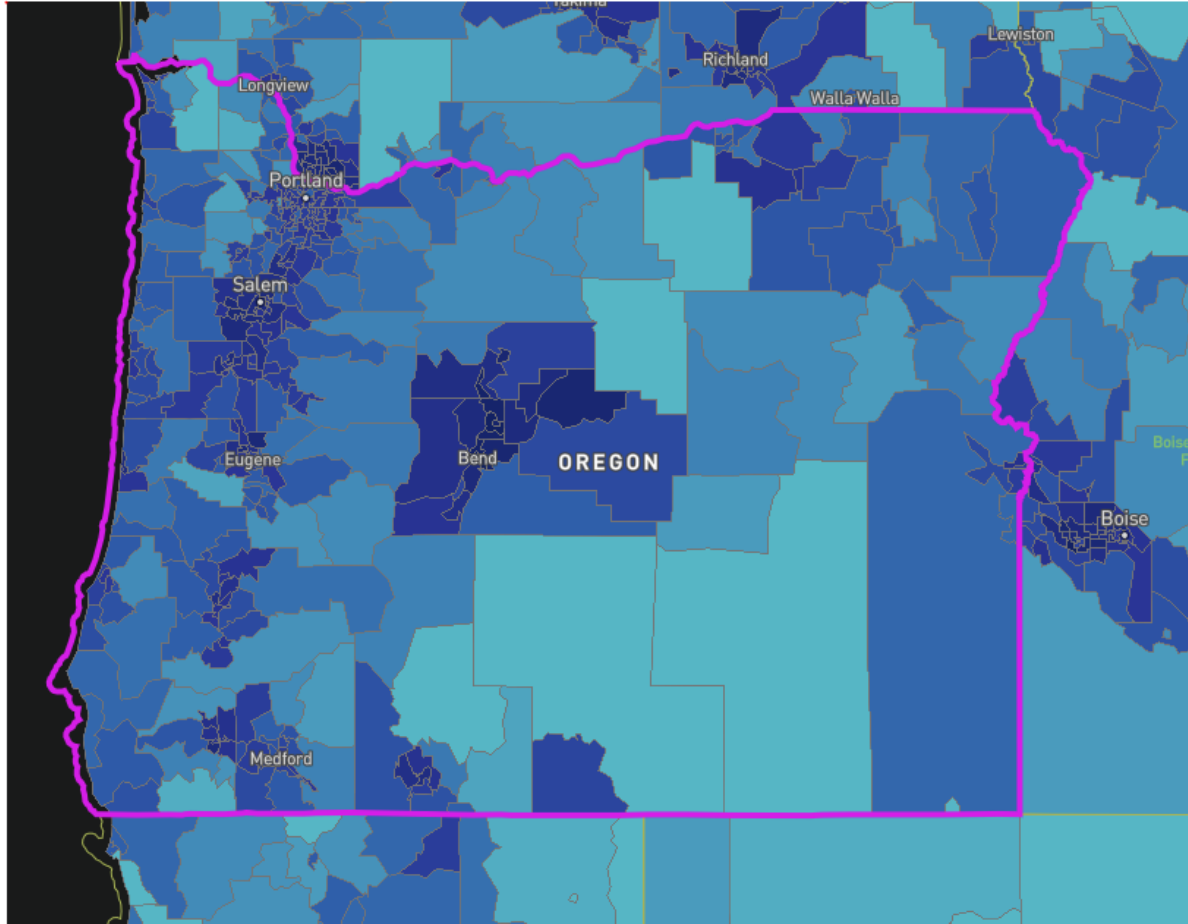
Number of Broadband Providers



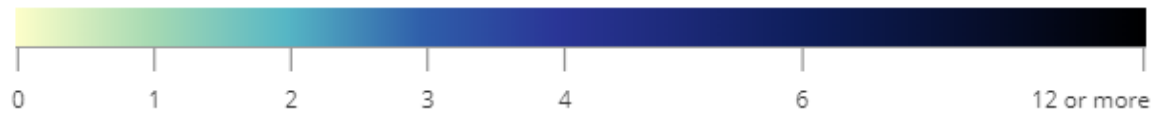
Data Oregon Broadband Mapping Project, November 2020.

Source: <https://www.oregon4biz.com/Broadband-Office/Interactive-Map/Map/>

Fixed Residential Broadband Providers



Number of Fixed Residential Broadband Providers



Data Federal Communications Commission, June 2019

Source:

MA-65 Hazard Mitigation - 91.210(a)(5), 91.310(a)(3)

Describe the jurisdiction's increased natural hazard risks associated with climate change.

According to the Oregon Health Authority's "Climate Change and Public Health in Oregon" report in from 2018, Oregon continues to warm due to climate change with an expected increase in average temperature from between 3 and 7 degrees by 2050. This increase in temperature will be accompanied by a decrease in snowpack of 50 percent. The resulting impact will be increased drought conditions and more extreme events like wildfire, flooding, and heat waves. These events are likely to cause destruction of property, loss of human life, poor air quality, and related respiratory illnesses.

The report projects that impacts will be suffered disproportionately by areas in flood plain zones, drought prone areas, and urban areas where urban heat island affect will be most acute. Other geographies at risk of climate change impacts include wildland-urban interface zones, agricultural communities, coastal communities, housing on steep slopes, and households reliant on private water systems. Certain demographic groups will also be at greater risk, including older adults, people with pre-existing conditions, low-income communities, communities of color, immigrants/refugees and linguistically isolated communities, as well as American Indian residents.

Describe the vulnerability to these risks of housing occupied by low- and moderate-income households based on an analysis of data, findings, and methods.

Many low and moderate income households occupy urban areas where urban heat island affects will be more prominent with climate change and temperate increases. Affordable housing is commonly located in areas where land is inexpensive or undesirable, which may include areas within flood plains that will be increasingly at risk. The demographic groups most likely to be affected by natural hazard risks associated with climate change include older adults, people with pre-existing conditions, low income communities, communities of color, immigrants/refugees and linguistically isolated communities, as well as American Indian residents.

Participants in the Columbia Gorge/Northeast Oregon stakeholder roundtable characterized housing affordable to low and moderate income households are manufactured homes located in floodplains. Blight and housing in substandard condition also disproportionately impact low income households in Lake and Klamath counties, as described by participants in the Central/South Central/Southeast stakeholder roundtable. Participants in the North Coast region stakeholder roundtable identified increasing the supply of affordable rental housing, rental assistance and funding for owner-occupied home repair to address poor conditions as the

greatest housing needs in the region. Participants shared that current programs to make condition improvements are vastly “oversubscribed” and more resources are needed. Southern Oregon stakeholder roundtable participants characterized housing needs in the region as “critical.” The combination of an aging population and aging housing stock leads to substandard housing conditions.

Stakeholders in regions with farmworker housing described the need for condition improvements. For example, *“Orchards are charging a fee to live in cabins and sometimes these cabins are in not in the best condition to live in. A lot of workers have no AC in the summer or heaters in the winter. Maybe addition support to orchardist to help make the cabins livable.”* (Stakeholder survey respondent)

Strategic Plan

SP-05 Overview

Strategic Plan Overview

The Consolidated Plan is designed to help jurisdictions develop a strategic plan to address their housing and non-housing community development needs. The strategic plan builds on the findings of the Needs Assessment and Housing Market Analysis by requiring that the state develop goals to meet the needs of the communities HUD serves. The annual action plans, and the companion Consolidated Annual Performance and Evaluation Reports (CAPER/PER), are detailed reports on how well the state is able to meet these goals.

Housing supply is very tight in the state: in 2019, Oregon homeownership vacancy rates were 1.0 percent and rental vacancy rates were 5.1 percent. As demonstrated in the Needs Assessment and Housing Market Analysis,

- More than 85,000 units affordable to extremely low income households (making less than 30% AMI) are needed to meet demand;
- More than 26,000 units affordable to moderate income households, making 50 percent to 80 percent AMI are needed to meet demand;
- People of color, people with disabilities, people with SPMI or SUDs, people with criminal histories, people with past evictions, survivors of intimate partner violence, and frail elderly are among Oregonians with disproportionate housing needs, and more likely to be cost burdened and at-risk of homelessness;
- The 2019 Point-in-Time Count revealed nearly 16,000 people were homeless in Oregon, an increase of 13 percent since 2017 when there were nearly 14,000 people living in homelessness. Nearly two-thirds of these residents, including families with children, are unsheltered; and
- Community development needs, particularly for water and sewer infrastructure, Internet infrastructure, childcare provision, microenterprise, and economic development are critical to the long term sustainability of Oregon's rural and frontier communities.

The lead agencies—OHCS, OBDD-IFA, and OHA—developed this strategic plan to devote federal resources and leverage state resources to mitigate these pressing needs. The strategic plan goals support housing and community development activities to:

- Develop and preserve affordable housing;
- Transition residents from homelessness to housing stability, including provision of needed supportive services;

- Address disproportionate housing needs experienced by people of color, including an emphasis on building strong and effective partnerships with organizations led by or serving people of color across the state;
- Address disproportionate housing needs experienced members of special need populations, including resources for supportive services, accessibility modifications, and working with partners in the public and private sector to reduce barriers to housing experienced by people with criminal histories or past histories of eviction.

The Consolidated Plan will be used to help the state develop useful strategies to meet the housing, homeless, and community development challenges facing Oregon. The strategies and goals of the plan were developed in partnership with the community and with an eye toward social equity. This work builds on the foundation of the 2019 Statewide Housing Plan required under ORS 456.572, the 2021 Analysis of Impediments to Fair Housing Choice and will inform the planning work of OHCS, OBDD-IFA, and the Oregon Health Authority.

SP-10 Geographic Priorities – 91.315(a)(1)

Geographic Area

The funds for the CDBG, HOME, HTF, ESG, and HOPWA programs are not allocated using geographic priorities. Oregon 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.

The state's Qualified Allocation Plan (QAP), that is the basis of scoring for affordable rental developments receiving tax credits, prioritizes projects on location accessibility, amenities, opportunity areas while balancing the need to invest in vulnerable areas. OHCS divided the HOME Balance of State (BOS) region into an urban BOS and a rural BOS to ensure that rural communities would not have to compete for resources with larger communities in the urban BOS.

Since funds are not tied to geography, OHCS and OBDD-IFA are working to build capacity in Oregon's non-entitlement areas so that communities with limited personnel and other resources can compete for HUD block grant funds. The goal is to increase the development and project pipeline in rural Oregon.

To address the need to stimulate economic opportunities, Oregon is enhancing livability, investing in job retention and creation through infrastructure improvements, community facilities rehabilitation and construction, owner occupied house rehabilitation and microenterprise assistance.

Table 1 - Geographic Priority Areas

General Allocation Priorities

Describe the basis for allocating investments geographically within the jurisdiction (or within the EMSA for HOPWA)

CDBG funds are awarded on a quarterly basis to eligible units of general local government in the non-entitlement areas of the state. Allocations are made through a competitive application process. Details of this process can be found in the CDBG Method of Distribution (MOD) attached to this plan.

Distribution of ESG funds follow an allocation formula based on the percentage of the state's severely rent-burdened households and economically disadvantaged households in each county, and the Point-in-Time homeless count. Economically disadvantaged households are defined as a percent of total households based on the number of persons living below the

federal poverty line reported in the Census Bureau's Small Area Income and Poverty Estimates report.

HOME funds are generally distributed through a Notice of Funding Allocation (NOFA), on a competitive basis, based upon project rankings determined during an application process established by OHCS. HOME funding may be awarded to any project located within the Balance of State.

HOME funds are allocated to Tenant Based Rental Assistance (TBRA) to serve households at or below 50 percent of median household income. TBRA allocations are determined using a formula established by a strategic needs analysis which factors in the percentages of cost-burdened, severely cost burdened, households below poverty level, and households with 50 percent median household income or less per county. The geographic distribution of these funds is related to where residents find housing.

HOPWA funds are distributed based on client acuity and made through direct payment on behalf of participating clients. Clients are prioritized for assistance based on their assessed need. The distribution of resources closely aligns with the HIV prevalence in the Balance of State.

SP-25 Priority Needs – 91.315(a)(2)

Priority Needs

The five-year priority needs below were developed from findings in the Needs Assessment, Housing Market Analysis, and resident and stakeholder community engagement. For the 2021-2025 Consolidated Plan all of the listed needs are ranked with a high priority and intend to be funded during the five-year period.

As discussed throughout this plan, the infrastructure and housing needs facing Oregon are extensive—and, during 2020, were exacerbated by the pandemic and historical wildfires.

Oregon does not allocate funds based on geography but ensures that funds are available for the balance of state covered by each program.

Priority housing needs

- Rental assistance and additional units for extremely low income households (at or below 30% AMI);
- Rental assistance and additional units for very low income households (60% AMI or less);
- Permanently supportive housing;
- Services for very low income and special needs residents;
- Emergency shelters for people who are homeless;
- Transitional housing for people moving out of homelessness;
- Rental assistance and additional units for low to moderate income households (80% AMI or less);
- Improvements/rehabilitation to housing in poor condition.

Priority community development needs (detail of non-housing related need assessment can be found within appendix E)

- Infrastructure for Broadband/Internet access to a community or parts of a community;
- Water and sewer infrastructure;
- Community facilities/public facilities, particularly to support essential community needs;
- Downtown/Main Street revitalization.

SP-30 Influence of Market Conditions – 91.315(b)

Influence of Market Conditions

Which market characteristics will influence the use of TBRA, Rehabilitation, New Unit Production, and Preservation?

Oregon acknowledges that market conditions influence the way funds will be delivered and will influence the use of funds available.

Tenant-Based Rental Assistance

As rental costs have increased—much faster than renter incomes—the demand for tenant-based rental assistance (TBRA) has increased. In the absence of additional federal funds for TBRA and a substantial decrease in rental costs—which is unlikely—TBRA needs are expected to continue.

New Unit Production

Housing production has not kept pace with demand, and the pandemic and wildfires have exposed the significant need for more affordable housing. New unit production is likely to be needed until vacancy rates rise well above current levels.

Rehabilitation

Rehabilitation of existing units is a cost effective way to insure that units remain affordable to low-income and extremely low-income renters. As the state's population ages and more Oregonians are living on fixed incomes, rehabilitation demand will likely increase. As a part of the effort, CDBG is including the rehabilitation of owner-occupied homes as one of the highest priority for assistance within the annual funding and CDBG-CV.

Acquisition, including preservation

The opportunity to acquire and preserve affordable housing depends on local market condition, the willingness of an owner to sell, and the terms of that offer.

Affordable Housing Type	Market Characteristics that will influence the use of funds available for housing type
Tenant Based Rental Assistance (TBRA)	Increased demand for housing affordable to < 50% AMI households; impact of COVID on renters who have experienced economic losses
TBRA for Non-Homeless Special Needs	Increased demand for housing affordable to < 50% AMI households; impact of COVID on renters who have experienced economic losses
New Unit Production	Continued need for small affordable rental developments including those that are accessible and visitable
Rehabilitation	Allocation of CDBG funds for rehabilitation will be evaluated after economic conditions related to COVID stabilize
Acquisition, including preservation	Presence of vacant and underutilized properties and weak interest by the private sector to redevelop

Influence of Market Conditions

SP-35 Anticipated Resources - 91.315(a)(4), 91.320(c)(1,2)

Introduction

Assuming funding levels of the annual block grants remain constant through the 2025 program year (ESG-CV funds must be spent by September 30, 2022), over the course of the Consolidated Period the State of Oregon will make the following HUD funds available through the four programs included in this plan.

Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	Federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	\$12,303,168		\$11,945,084	\$24,248,252	\$49,212,672 (4x current year allocation)	
HOME	Federal	Multifamily Acquisition Multifamily rental new construction Multifamily rental rehab TBRA, CHDO Operating Support Grants	\$9,192,486	\$108,574		\$9,301,060	\$36,769,944 (4x current year allocation)	

HTF	Federal	Multifamily Acquisition Multifamily rental new construction Multifamily rental rehab	\$9,816,938				\$39,267,752 (4x current year allocation)	
HOPWA	Federal	Permanent housing in facilities Permanent housing placement Short term or transitional housing facilities Short-Term Rent, Mortgage and Utility Assistance Supportive services TBRA	\$610,989				\$2,443,956 (4x current year allocation)	

ESG	Federal	Conversion and rehab of emergency shelters Financial Assistance Overnight shelter Rapid re-housing (rental assistance) Homeless Prevention Rental Assistance Services Transitional housing	\$1,940,010				\$7,760,040 (4x current year allocation)	
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Anticipated Resources

Explain how federal funds will leverage those additional resources (private, state and local funds), including a description of how matching requirements will be satisfied

HUD funds will be used in conjunction with other federal, state, and local funding to maximize investments in affordable housing and community development activities. For purposes of this document, a subsequent public comment period will not be required if there is a variance in the annual allocations. Rather any variance in the estimates will be discussed in the annual action plans and consolidated annual performance and evaluation reviews for the remainder of the Consolidated Plan period.

There is no match requirement for the implementation of CDBG funds to the prioritized activities listed in the table above. However, CDBG funds often are leveraged with other local resources. OBDD-IFA will provide additional funds as match to the CDBG allocation, fulfilling the one-to-one matching requirements of the program.

OHCS provides tax credits and various gap financing to affordable housing developers. This process encourages creativity in the use of federal, state, and local government resources with private resources to meet the needs of communities. OHCS administers the federal LIHTC program, a major funding source for development of affordable housing. Tax credits are leveraged with other state and federal funds through a competitive NOFA process. OHCS also administers the non-competitive four percent tax credits used in conjunction with tax-exempt bonds.

Matching funds for the HOME Program come from various state and local resources, including the Oregon Affordable Housing Tax Credit. There is no non-federal match requirement for the National Housing Trust Fund program. One hundred percent match is required by the ESG program. Matching contributions for the ESG Program may come from many sources, including federal, state, local, and private sources; match is waived for ESG-CV. HOME TBRA can be used as match in very limited circumstances. The following requirements apply to matching contributions from a federal source of funds:

- Adherence to laws and or grant restrictions, which govern use of funds for ESG match; and
- If ESG funds are used to satisfy matching requirements of another federal program, funding from that program cannot be used to satisfy the match requirements for ESG.

Non-cash matching resources may include the value of the lease on a building, salary paid to staff carrying out the program (paid for with non-ESG dollars), and the value of the time and services contributed by volunteers to carry out the program. OHCS may consider exceptions on a case-by-case basis in consultation with the sub-grantee.

HOPWA funding is leveraged through additional resources. Federal Ryan White Part B funds and general state funds provide households served with insurance assistance, case

management services, and wrap around support services. Emergency utility assistance is provided through the state's Low-Income Energy Assistance Program. HOPWA has no match requirement, does not generate any program income, and will not use land or property that is publicly-owned. As the grantee, OHA works with community housing and social service partners and leverages additional program funding to provide a continuum of HIV services.

If appropriate, describe publicly owned land or property located within the state that may be used to address the needs identified in the plan

OHCS does have a land acquisition program, but it is not tied to state land. While Oregon does have a significant amount of state surplus land dedicated to schools, statute requires that buyers of this surplus land pay market rate prices for the land. Ideally, this statute will be altered to prioritize using this land for affordable housing, including opportunities to preserve affordability through below-market land prices.

The 2015 State Legislature passed HB 3524, which requires the state to provide notification to developers of affordable housing when selling or disposing of appropriate real property. The Department of Administrative Services maintains a website with that information:

<https://www.oregon.gov/das/Facilities/Pages/ResLandForSale.aspx>

For other publicly owned land: The state does not control the type of applications received for block grant funds. If publicly owned land is contributed as part of a project, that should be identified in the application and would be considered as match.

SP-40 Institutional Delivery Structure – 91.315(k)

Explain the institutional structure through which the jurisdiction will carry out its consolidated plan including private industry, non-profit organizations, and public institutions.

Many partners will be involved in achieving the goals identified in the 2021-2025 Consolidated Plan. The development of the Consolidated Plan and program delivery falls primarily to the three departments who receive CDBG, HOME, ESG, HTF or HOPWA funds: OBDD-IFA, OHCS and OHA. But the work could not be performed adequately without the support and commitment of the following agencies and community partners: the Oregon Housing Stability Council, Department of Human Services, Community Action Partnership of Oregon, and the Rural Oregon Continuum of Care.

Responsible Entity	Responsible Entity Type	Role	Geographic Area Served
OHCS	State Agency, Housing Finance Authority	HOME, ESG, HTF program delivery	Statewide and Non-entitlement areas
OBDD-IFA	State Agency, State Economic Development Agency	CDBG program delivery	Non-entitlement Areas
OHA	State Agency, State Health Authority	HOPWA program delivery	Statewide and non-entitlement areas

Institutional Delivery Structure

Assess Strengths and Gaps in the Institutional Delivery System

Oregon is among the national leaders in implementing data driven public policies to reduce barriers to affordable housing, to affirmatively further fair housing, and to help all communities thrive. In addition to policy, the state has a number of funds dedicated to alleviating homelessness, increasing production of affordable housing, and supporting the state’s most vulnerable populations. But there is more work to be done.

The most pertinent gaps in the institutional delivery system are rooted in challenges associated with the rural and frontier nature of much of Oregon’s non-entitlement areas. These include lack of access to broadband Internet, lack of capacity at the local level to develop and administer large projects—both capacity in terms of staffing but also technical acumen—and difficulties finding contractors and project managers for construction and development projects. Both OHCS and OBDD-IFA have staff designated to work closely with communities in the non-entitlement areas to strength program delivery, provide technical assistance, and help communities successfully apply for and implement federally funded projects.

OBDD, specifically, house the Oregon Broadband Office that was established in December 2018, by Governor Brown's Executive Order, to promote access to broadband services for all Oregonians in order to improve the economy and quality of life. The Broadband office objectives is to:

- Support and coordinate efforts with the Oregon Broadband Advisory Council;
- Develop broadband investment and deployment strategies; manage and award funds allocated to the office for broadband projects

- Advocate for public policies that remove barriers, promote and coordinate solutions, support and promote broadband planning.
- Develop and maintain a broadband map as a platform for data collection to track the availability of broadband services and measure progress as well as other related information and provide public access to the data;

In collaboration with Oregon Broadband Office, and in addressing one of the highest priorities as a direct impact to the COVID-19, OBDD administered both Coronavirus Recovery Funds and CDBG-CV Program to help fund rural broadband projects in the form of grant funding for infrastructure construction and emergency response projects to provide increased broadband capacity internet access for telework, telehealth, and K-12 distance learning applications in unserved and underserved areas in response to the COVID-19 public health emergency. Other Agencies such as USDA and Department of Education have been another active contributors in the other possible funding working in the rural broadband projects.

Recent reviews of data suggest that communities of color are not proportionately served by current systems and OHCS, CAA, and the CoCs are actively seeking opportunities to form partnerships with culturally specific and culturally responsive organizations to address disparities in access to services. In addition to outreach, developing effective partnerships will include investing resources to provide the technical assistance and training required to operate a HUD program.

Access to mental health and behavioral health resources is a significant gap statewide and especially in non-entitlement areas. As noted previously, there has been little crossover between Oregon's Medicaid behavioral health system and the homeless system. Through its emphasis on PSH and other projects related to supportive services, OHCS hopes to develop more intentional partnerships and better alignment between the two systems.

Availability of services targeted to homeless persons and persons with HIV and mainstream services

As a state, Oregon uses all available tools to provide services to persons who are homeless, persons with HIV, as well as mainstream services. While all of the services shown in Table 55 are available in the state, some are not available in every non-entitlement community. As mentioned previously, a lack of access to mental health and SUDs treatment options is a significant unmet need in many rural and frontier communities. Other services may be delivered at a regional level, requiring residents seeking aid to travel fairly long distances. The COVID pandemic further strains resources; though many service providers shifted to online modes of service delivery, a lack of affordable and reliable access to broadband Internet (or a lack of Internet service or devices) is a barrier to mainstream services.

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			
Other			

Homeless Prevention Services Summary

Describe the extent to which services targeted to homeless person and persons with HIV and mainstream services, such as health, mental health and employment services are made available to and used by homeless persons (particularly chronically homeless individuals and families, families with children, veterans and their families and unaccompanied youth) and persons with HIV within the jurisdiction

Recipients of HOPWA funded housing are required to be enrolled in Ryan White HIV Case Management; this is a strength of Oregon’s HOPWA program. Housing staff work in close partnership with Ryan White funded case management providers throughout 31 counties outside of the Portland metropolitan area. Because Ryan White funded services are the payer of last resort, case managers are required to ensure clients access mainstream state, federal, and community based resources such as: food stamps, Medicaid/Medicare, Social Security, Social Security Disability, and other services through partner agencies. When existing resources

cannot meet client needs, OHOP clients can qualify for an array of Ryan White funded supportive services including but not limited to: substance use treatment, mental health treatment, nutritional therapy/food, transportation, translation services, oral health care, home health care, referral and information, and emergency housing. Clients also qualify for CAREAssist, Oregon's AIDS Drugs Assistance Program, which provides access to health insurance, medical care, and prescription medications. Furthermore, an employment services program, located at partner agency HIV Alliance, is available to a majority of clients who live in the Balance of State.

Oregon Housing and Community Services, through our statewide network of Community Action Agencies (CAAs) historically has prioritized ESG funds to serve homeless persons through street outreach, emergency shelter, rapid rehousing and the case management provided in tandem with those services. Through the connection to the local CAAs, which have a presence and leadership role in each of the Continuum's of Care (CoCs) homeless households can be given opportunities to receive services for other needs, including but not limited to: medical care, mental health care, and food and nutrition. It is the intention of OHCS to use state EHA funds for prevention services and focus ESG funds on PSH and emergency shelter. Strong partnerships with the CAAs and CoCs will be necessary to ensure that persons experiencing homelessness have access to mainstream services. OHCS is in the process of becoming the statewide HMIS lead, to better support coordinated entry and to lead data-driven programming. People who benefit from coordinated entry and these systems include foster youth, people with disabilities, veterans, people leaving correctional institutions, people discharged from hospitals, homeless students, and victims of domestic violence. CAAs work with area partners, small businesses, government entities, and landlords to help low income people who have a criminal history or other barriers successfully re-enter communities. OHCS will target a portion of the ESG-CV funds to non-profit entities who will provide specialized services in communities to bolster and compliment assistance received through the CAA network.

Describe the strengths and gaps of the service delivery system for special needs population and persons experiencing homelessness, including, but not limited to, the services listed

Oregon supports policies and programs that increase the supply of affordable housing, provide needed services to residents, and recognizes the unique and often disproportionate needs experienced by members of special need populations and persons experiencing homelessness.

As discussed previously, the most pertinent gaps in the institutional delivery system are rooted in challenges associated with the rural and frontier nature of much of Oregon's non-entitlement areas. These include lack of access to broadband Internet, lack of capacity at the local level to develop and administer large projects, and the lack of mental health services and behavioral health services in many rural and frontier communities. In addition to more funding, there is

room to improve the alignment of the mental and behavioral health system to the affordable housing and homeless services system. There is also a need to build partnerships with culturally specific and culturally responsive organizations to address disparities in access to services.

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

Building capacity through technical assistance is one of the primary strategies OBDD-IFA and OHCS are pursuing to address the challenges small towns and organizations in non-entitlement areas experience that make successfully applying for and delivering federally-funded projects so difficult. By becoming the statewide lead for HMIS, OHCS hopes to increase the effectiveness of coordinated entry. OHCS is working closely with CAAs and their affiliated CoCs to develop meaningful partnerships with culturally specific and culturally responsive organizations to better serve people of color through the balance of state.

SP-45 Goals Summary – 91.315(a)(4)

Goals Summary Information

This table provides an overview of the goals identified by each program and the estimated funding available over the Consolidated Plan period.

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	CDBG - Public Works	2021	2025	Non-Housing Community Development	None	CDBG-Public Works	CDBG: \$31,360,295	10 Projects
2	CDBG – Community/Public Facilities	2021	2025	Non-Housing Community Development and Homeless/Non-Homeless special Needs	None	CDBG-Public/Community Facilities	CDBG: \$11,834,075	10 Project
3	CDBG - Microenterprise Assistance	2021	2025	Non-Housing Community Development	None	CDBG-Microenterprise Assistance	CDBG: \$1,183,405	250 Businesses Assisted
4	CDBG - Housing Rehabilitation	2021	2025	Affordable Housing	None	CDBG-Housing Rehabilitation	CDBG: \$14,792,590	500 Housing Units
5	CDBG - Community Capacity/ Technical Assistance	2021	2025	Non-Housing Community Development	None	CDBG-Community Capacity/Technical Assistance	CDBG: \$615,160	15 Projects
6	CDBG – Emergency Projects	2021	2025	Non-Housing Community Development	None	CDBG – Emergency Projects		Department will ensure if a bona fide disaster occurs, projects will meet CDBG requirements and will be reported accordingly.
7	Prevent and divert people from becoming homeless	2021	2025	Homelessness Prevention	None	Homelessness Prevention services, financial assistance, rent subsidy and case management	HOME: \$ 11,030,985 ESG: \$1,859,210	Tenant-based rental assistance for 2,000 households Homelessness Prevention for 8,500 persons
8	Reduce homelessness	2021	2025	Homeless	None	Rapid Rehousing with Supportive Services Rental Assistance Shelter Beds and Homeless Services Street Outreach	ESG: \$,7,113,340	Tenant-based rental/rapid rehousing assistance for 1500 persons; Shelter: 7,500 persons; Street Outreach: 32,500 persons

9	Fund affordable housing	2021	2025	Affordable Housing	None	Accessible Housing Affordable Housing Rehabilitation and Preservation of Units	HOME: estimated at \$29,335,205 HTF: \$44,176,225	Rental units constructed: 600 Housing Units Rental units rehabilitated: 150 Housing Units Accessible Units: Minimum of five percent of units built.
10	Affirmatively further fair housing	2021	2025	Other / Fair Housing	None	Fair access to housing and housing choice	Agency Wide Expense	OHCS has a Contract with FHCO to provide fair housing services throughout the state.
11	Provide people with HIV/AIDS supportive housing	2021	2025	Other / Supportive housing for people with HIV	None	Permanent Housing with Supportive Services Rental Assistance	HOPWA \$2,963,295	Tenant-based rental assistance and Supportive Services for 155 households, PH Placement 15
12	CHDO Operating Support Grant	2021	2025	Affordable Housing	None	Affordable Housing	HOME: estimated at \$1,000,000	To provide operating support grants to 4 certified CHDOs that are actively involved in development of a HOME assisted affordable housing project.
13	Administration	2021	2025	Affordable Housing Administration	None	Accessible Housing Affordable Housing	HOME: estimated at \$4,596,240 CDBG: \$1,730,315 HTF: estimated at \$4,908,465 HOPWA: \$91,650 HOPWA CARES Act: \$5,119. (CARES Act; award once in 2019) ESG: \$485,000 to OHCS; \$242,500 to subgrantees	A percentage of each program allocation is generally allowed for administration costs.

Goals Summary

Goal Descriptions

Table 4 – Goal Descriptions

1	Goal Name	CDBG - Public Works
	Goal Description	Provide sustainable and suitable living environments through enhancements, improvements or construction of water and wastewater systems to provide availability and accessibility to clean, safe drinking water and safe sanitary sewer systems
2	Goal Name	CDBG - Public/Community Facilities
	Goal Description	Rehabilitation or construction of community facilities such as food banks, family resource centers, community centers, senior centers, fire stations or libraries, many of which rarely produce a reliable or sufficient revenue stream to repay a loan.
3	Goal Name	CDBG - Public/Community Facilities
	Goal Description	Rehabilitation or construction of drug and alcohol treatment centers, Head Start facilities, mental health and health clinics, sheltered workshops for people with disabilities, domestic violence shelters, and emergency/homeless shelters.
4	Goal Name	CDBG - Microenterprise Assistance
	Goal Description	Improve economic opportunities through training and classes aimed at improving the conditions and success for business owners the majority of whom will be low-to-moderate income persons.
5	Goal Name	CDBG - Housing Rehabilitation
	Goal Description	Preserve decent housing, improving the sustainability and affordability of existing housing stock, through rehabilitation projects of single-family, owner-occupied homes by providing grants or loans to complete needed repairs, many of which are health and safety related. One hundred percent of the funds in this goal will serve low-to moderate-income homeowners.
6	Goal Name	CDBG - Community Capacity/ Technical Assistance
	Goal Description	Oregon uses one percent of CDBG funds to train and provide technical assistance to several economic development organizations, infrastructure conferences, and other local capacity building events, grant administration workshops, applicant workshops, grant management training, and one-on-one technical assistance.
7		CDBG - Emergency Projects

		<p>The State of Oregon uses CDBG funds to assist in repair or mitigate damage that were a direct result of a qualifying disaster from bona fide emergencies. To be considered a bona fide emergency the situation must be:</p> <ul style="list-style-type: none"> ○ Officially declared by the Governor as a "State of Emergency" needing immediate action; and, or ○ A presidential disaster declaration has been issued for the event <p>Funds for this program is limited to five percent cap of the annual allocation, this fund will be set aside at the time when we see the need.</p>
8	Goal Name	Prevent and divert people from becoming homeless
	Goal Description	<p>Promote services to support people at risk of homelessness and work to prevent homelessness through increased housing stability using services that include but are not limited to: security and utility deposit payment, rent subsidy, and case management and self-sufficiency opportunities. Acknowledge that preventing individuals and families from becoming homeless is critical to ending homelessness. Every episode of homelessness that can be averted spares men, women, and children the psychological and physical trauma of not being housed.</p>
9	Goal Name	Reduce homelessness
	Goal Description	<p>Promote programs that reduce homelessness through homeless prevention services such as financial and rent assistance, and re-house people experiencing homelessness into permanent housing. Rapid re-housing places a priority on moving a family or individual experiencing homelessness into permanent housing as quickly as possible, ideally within 30 days of becoming homeless and entering a program. OHCS Homeless Services funds provide rent assistance and pay security deposits. Both homelessness prevention and rapid rehousing services couple financial and/or rent assistance with case management and self-sufficiency opportunities. Clients may be provided referrals to agencies that can help address, mitigate and possibly alleviate other barriers causing housing instability.</p>
10	Goal Name	HOME and HTF- Fund affordable housing
	Goal Description	<p>Oregon HOME and HTF funds are used to finance the development of affordable housing for low income households, HTF funds are focused largely on extremely low income households. Funds can be used for new construction, acquisition and rehabilitation. The HOME and HTF programs meet the accessibility requirements of section 504 of the Rehabilitation Act.</p>
11	Goal Name	Affirmatively further fair housing

	Goal Description	Work diligently to promote fair housing and access to housing choice for all Oregonians. Take meaningful action to overcome patterns of segregation and promote inclusive communities free of barriers to opportunity. OHCS is committed to distributing resources and supporting programs to address housing inequities and disparities experienced by communities of color and other underserved communities.
12	Goal Name	Provide people with HIV/AIDS supportive housing
	Goal Description	HOPWA funds will meet the permanent housing needs of people living with HIV through provision of tenant based rental assistance, supportive services and permanent housing placement, to include deposits. HOPWA funding will be leveraged through federal Ryan White Part B funds and general state funds to provide insurance assistance, case management services, and wrap around support services.
13	Goal Name	Provide people with HIV/AIDS relocation services and temporary lodging
	Goal Description	OHA will meet the needs of people living with HIV (PLWH) and their households through the provision of temporary lodging services through hotel/motel stays for COVID response. Funds for this program are from the CARES Act and are reflected in 2019 Action Plan (Amended) resources; this activity will continue into the 2021-2026 program years. Payment for hotel/motel stays will be for the purpose of isolation and quarantine to support the health of a PLWH who is vulnerable to COVID-19. OHA will fund short term hotel/motel stays for: a) unhoused HOPWA-eligible individuals or households needing to stabilize their health and wellness, or b) current OHOP clients (receiving TBRA) or their household member, regardless of HIV status, who need to quarantine separately from their household per the recommendation of their medical provider.
14	Goal Name	Provide support grants to certified CHDOs
	Goal Description	Five percent of the HOME allocation will be used to provide operating support grants to certified CHDOs that are actively involved in development of a HOME assisted affordable housing project.
15	Goal Name	Administration
	Goal Description	State Administration of various programs

Estimate the number of extremely low-income, low-income, and moderate-income families to whom the jurisdiction will provide affordable housing as defined by HOME 91.315(b)(2)

The HOPWA program serves people earning at or below 80 percent of AMI and Oregon's HOME program serves people earning between 50 and 60 percent of AMI.

Annual estimates are that Oregon will assist 505 families or individuals annually with affordable housing. Of these 55 are people with HIV/AIDS or special needs. Over the course of the plan period, Oregon will provide 2,525 families or individuals affordable housing through a mix of rental assistance (1,500 families), new units and rehabilitation of existing units (750 units), and housing support for families with people living with HIV/AIDS (275)

OHCS makes affordable housing development funds available through NOFAs. Capital development funding programs have established income limitations determined by the funding source. OHCS usually does not place additional income restrictions in the NOFA. The incomes served in affordable housing units are determined by the type/s of housing applications accepted and the funding sources of each project. HOME Multifamily Rental Projects contain designated units for households earning 50 percent and 60 percent of median income, in accordance with federal regulation. OHCS estimates 300 low-income families with incomes below 60% MFI will be housed by affordable housing units funded with HOME dollars. The HTF resources will support affordable housing development for approximately 450 extremely low-income families with incomes below 30% MFI.

In addition to funding the development of new affordable housing units, HOME resources are used to provide rent assistance under this section to approximately 300 families annually, all of whom are low-income. OHCS does not use ESG funding to provide affordable housing as defined by HOME 91.315(b)(2).

SP-50 Public Housing Accessibility and Involvement – 91.315(c)

Oregon does not administer public housing funds. If HUD designates a PHA as troubled, the PHA would work directly with HUD to resolve any issues. However, OHCS does work with local Public housing Authorities within its jurisdiction and assures that their PHA plans are consistent with the Consolidated Plan. During this process, OHCS requests input from any troubled PHAs regarding possible assistance the state could provide.

Need to Increase the Number of Accessible Units (if Required by a Section 504 Voluntary Compliance Agreement)

N/A

Activities to Increase Resident Involvement

N/A

Is the public housing agency designated as troubled under 24 CFR part 902?

N/A

Plan to remove the ‘troubled’ designation

N/A

SP-55 Barriers to affordable housing – 91.315(h)

Barriers to Affordable Housing

In Oregon, barriers to affordable housing development are driven less by state regulations than broader economic factors including: high costs of construction; limited federal assistance to facilitate affordable housing development; and the growing income gap.

The review of state regulations that affect residential development and investment for the 2021 Analysis of Impediments reflected positively on the state. That review found that the state's standards are stronger, and remove barriers to fair housing choice more effectively, than those in the statutes of most 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.

Strategy to Remove or Ameliorate the Barriers to Affordable Housing

OHCS Housing Integrators have been working with the Governor's Regional Solutions teams, which include DLCD staff, to help communities improve their housing planning efforts. In addition, Housing Integrators have been working with League of Oregon Cities and Association of Oregon Counties to explore partnerships with local governments in advancing housing opportunities.

In 2019 the Oregon Legislature passed HB 2003. This law requires OHCS to work with DLCD and the Oregon Department of Administrative Services to develop methodology to conduct regional housing needs analysis and, for certain cities and Metro, to estimate existing housing stock, to establish housing shortage analysis and to estimate needed housing units for next 20 years.

This work involved input from a broad base of stakeholders including local jurisdictions, AOC, LOC, FHCO, other fair housing advocates. Our final report to the legislature submitted March 1, 2021 recommends: (1) To move forward with the RHNA, including OHCS's addition of analysis describing the inequities in housing outcomes that are included to support local planning efforts; (2) To continue joint agency work (perhaps through a Task Force) on the remaining research questions about the larger implementation framework that is needed around the RHNA in order to use the RHNA to achieve better fair housing outcomes, and what legislation would be needed to institute such an implementation framework. We hope the legislature will take action based on these recommendations to improve upon a housing planning system that is grossly out of pace with the current housing needs and is also divorced from fair housing efforts.

OHCS works closely with the Fair Housing Council of Oregon to help educate and promote Fair Housing Across the State. Through this partnership, a Fair Housing hotline has been established for tenants, affordable housing providers have access to Fair Housing training and an Affirmatively Furthering Fair Housing Committee has been established and actively meets to discuss educational, enforcement and systemic barriers to fair housing across the state.

OHCS, OBDD-IFA and OHA refer regularly to the Analysis or Impediments findings and actively engage in removing or reducing the identified barriers to Fair Housing in the State of Oregon.

SP-60 Homelessness Strategy – 91.315(d)

Reaching out to homeless persons (especially unsheltered persons) and assessing their individual needs

Oregon Housing and Community Services (OHCS), together with the Community Action Agencies (CAAs) across the state use Emergency Solutions Grant Program (ESG) funds to assist individuals and families regain housing stability after experiencing a housing crisis or homelessness.

Having adopted the recommendations of the Statewide Housing Plan, Oregon’s priorities for ESG funding are homeless families with children and homeless veterans. Oregon will encourage grantees to adopt the Housing First approach and incorporate persons with lived experience into the workplace. Even though rapid re-housing and Housing First projects are the key to permanent solutions for ending homelessness, the state’s severe shortage of affordable housing, the loss of shelter capacity resulting from COVID closures or congregate shelter restrictions, has forced subgrantees to spend towards prevention and shelter, which was reflected in the state’s 2020 allocation priorities. Moving forward, OHCS intends to direct state EHA funds to prevention and to focus ESG on rapid-rehousing and PSH. The state’s PSH Institute is in its second year; supported by general fund dollars, the purpose of the PSH Institute is to increase the number and long-term success of PSH projects across the state.

As discussed in the Needs Assessment, homelessness in Oregon increased by 13 percent from 2017 to 2019, and two-thirds of persons experiencing homelessness are unsheltered. There is a significant need for additional shelter capacity, surge capacity, and winter shelter beds, and this need was clearly articulated by stakeholders in every region. These needs are complicated by the COVID crisis which limits delivery of congregate shelter services. Strategies to increase the supply of affordable housing, to preserve existing affordable housing through recapitalization or rehabilitation, and conversion of market rate units to affordable units all contribute to efforts to reduce homelessness.

Oregon Housing and Community Services requires all ESG subgrantees to submit an Affirmative Outreach Plan (24 CFR 576.407(b)), as well as a written statement or plan for assisting applicants and clients with Limited English Proficiency (LEP) requirements. Recognizing that communities of color are underserved throughout the state, OHCS is working with CAAs to develop or strengthen relationships with culturally specific or culturally responsive organizations to improve access and effectiveness in serving people of color at risk of or experiencing homelessness. In conjunction with annual Point in Time counts, many OHCS ESG subgrantees conduct a Project Connect-type event as an outreach tool to provide services for people who are homeless or at risk of homelessness. Project Connect, and similar one-or two-day events,

offer a one-stop location where people experiencing or at-risk of homelessness can receive specialized services such as medical and dental care, hot meals, food boxes, clothing, camping supplies, eye exams, veterinary exams for pets, and legal services. These gatherings are an excellent tool to connect with hard to reach populations and start developing relationships.

Continuums of Care and service agencies across Oregon use a Coordinated Entry process to maximize and prioritize applicant intake. Coordinated Entry systems allow the provider to assess a person's needs using a centralized database, ensuring that each person receives a thorough, expedited assessment along with a coordinated approach to services. Use of standard assessment tools can help to align appropriate services with resources to fit personal needs. Through a network of case management, community based support systems, financial and rent assistance and self-sufficiency opportunities, homeless and at-risk households are linked to services designed to help them obtain or retain housing stability. OHCS is becoming the statewide HMIS lead to better facilitate data-driven decision-making across the balance of state.

Addressing the emergency and transitional housing needs of homeless persons

OHCS has funded two comprehensive studies regarding the state's housing needs and shelter inventory. Both studies state Oregon has an immediate need for additional shelters and increased capacity of communities to respond to the needs of their households experiencing homelessness. As demonstrated in the Needs Assessment, the majority of stakeholders consulted consider emergency shelter availability and capacity to be one of the most urgent unmet housing needs in their service area. Transitional housing is also a critical need for different segments of the population, including survivors of intimate partner violence, persons with SPMI, and those exiting homelessness who need transitional support but not the intensive resources of a PSH environment.

OHCS will continue to commit state and federal funds to fill gaps in shelter, transitional housing, permanent affordable housing, and other resources needed to answer the state's homelessness crisis.

Helping homeless persons (especially chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth) make the transition to permanent housing and independent living, including shortening the period of time that individuals and families experience homelessness, facilitating access for homeless individuals and families to affordable housing units, and preventing individuals and families who were recently homeless from becoming homeless again.

Oregon's Community Action Agencies (CAAs) and other service providers offer comprehensive services and support for households transitioning from homelessness to being housed. The Emergency Solution Grant Program (ESG), in combination with other resources, provides assistance to extremely low income households so they may secure, maintain, and retain housing.

Coordinated Entry systems optimize CAA efforts to coordinate with area nonprofit providers, and state and local governments, promoting effective use, and access, to mainstream programs and self-sufficiency services aimed at ending homelessness. Through a network of services that include case management, community based support systems, financial assistance, and personal budgeting, people experiencing or at risk of homelessness are linked to services designed to assist households reach and maintain housing stability. When entering shelter, an individual is assessed and provided essential services based on their needs and the services available. Services may include referral for mental health care, life skills supports, personal budgeting and finance, conflict resolution, and other needed skills that help reduce barriers and retain housing stability. Oregon Housing and Community Services (OHCS) promotes the use of a Housing First approach and will encourage subgrantees to use this model instead of shelter whenever possible. The approach is designed to serve the basic needs of the person before addressing or working to resolve identified barriers to housing. Shelter and housing providers can inadvertently institute barriers that keep homeless or extremely low income households from being eligible for assistance. OHCS continues to work with subgrantees through workshops and other communication so subgrantees have the tools to identify and remove barriers in shelters and housing.

Multiple efforts are being made to encourage landlords to rent to those who are homeless. Oregon Housing and Community Services manages two landlord guarantee programs for reimbursement of unit damage and loss of rent. One program is designed to encourage landlords to rent to tenants in HUD's Housing Choice Voucher Program. The other program provides landlords with assurances for recourse if they rent to a high-risk tenant.

Many subgrantees have hired a dedicated staff position to concentrate on identifying and securing housing units for their program participants. These housing navigators market rent-assistance programs to landlords, keep abreast of housing opportunities in their service communities, and assist their agency's clients in their housing search.

Help low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families who are likely to become homeless after being discharged from a publicly funded institution or system of care, or who are receiving

assistance from public and private agencies that address housing, health, social services, employment, education or youth needs

OHCS delivers the majority of rental assistance services through a statewide network of Community Action Agencies (CAAs), which is also the statewide system for delivery of anti-poverty services, including the Community Services Block Grant (CSBG). Community Action Agencies are able to align their poverty and homelessness resources to prevent homelessness and provide connections to supportive mainstream and community resources (i.e. employment services, child welfare assistance, TANF programs, etc.). OHCS encourages CAAs to work closely with community coordinated care organizations, governmental entities, nonprofits, mental and physical health providers, schools, public safety providers and others to design, implement, and deliver programs and services as partners in service to the most vulnerable Oregonians.

SP-65 Lead based paint Hazards – 91.315(i)

Actions to address LBP hazards and increase access to housing without LBP hazards

OHCS and OBDD-IFA strategies to address Lead Based Paint (LBP) hazards and increase access to housing without LBP hazards include:

- Inspection of funded properties for LBP hazards
- Implementation of monitoring, or informing property owners of monitoring requirements; and
- LBP education and training for staff and partners

OBDD-IFA developed procedures to eliminate the hazards of lead poisoning due to the presence of LBP in housing assisted with Community Development Block Grant funds. In accordance with the Lead Based Paint Hazard Reduction Act of 1992 (Title X) the state established a certification program for inspectors and contractors and accrediting programs for trainers.

How are the actions listed above integrated into housing policies and procedures?

The state of Oregon requires all applicants and sub-recipients, including affordable housing owners, developers and service providers, to conduct all related work and deliver all related services in accordance with the Lead Based Paint Poisoning Prevention Act and 24 CFR 570.487(c). Grant recipients, sub-recipients, applicants, project owners, and any others who apply for, or receive HUD funding, must certify compliance with all applicable LBP requirements as a part of contracts and agreements.

OHCS is not currently developing or monitoring any OHCS-funded housing projects that contain LBP, however properties constructed prior to 1978 may be subject to requirements for assessment, evaluation, and mitigation of lead-based paint, per federal regulation 24 CFR Part 35. OHCS compliance officers determine if monitoring for lead-based paint is required and, if necessary, implement, or advise property owners of monitoring requirements.

The ESG, HOME TBRA, and HOPWA TBRA programs require a visual assessment for LBP hazards as part of the housing standards inspection for each potential rental unit if the unit was built prior to 1978 and the household includes a child under age six. HOME TBRA rent assistance contracts cannot be effective or renewed for any unit needing LBP correction until the work has been completed and the unit passes a LBP clearance test.

All purchasers and tenants of CDBG assisted emergency homeless shelters, transitional housing, and domestic violence shelters constructed prior to 1978 receive a notice about the hazards of

LBP. Applicants for housing rehabilitation also receive notification. The notification form used is the current Environmental Protection Agency pamphlet, *Protect Your Family from Lead in Your Home*. Grant recipients must keep documentation of the notifications in their local project file.

Agency staff have opportunities for additional LBP education by attending HUD sponsored trainings on healthy homes, LBP rules, repairs, and technical assistance.

SP-70 Anti-Poverty Strategy – 91.315(j)

A state grantee's Consolidated Plan must provide a concise summary of the state's anti-poverty efforts and how the housing components of the Consolidated Plan will be coordinated with other programs, such as Temporary Assistance for Needy Families (TANF), and employment and training programs. State grantees can satisfy this requirement by citing statewide plans and other relevant planning documents.

Jurisdiction Goals, Programs and Policies for reducing the number of Poverty-Level Families

Skill building, education, and job training are critical for helping residents move out of poverty. Oregon has long been a leader in community college based initiatives that create career pathways for unemployed and underemployed Oregonians. In its most recent WIOA Combined State Plan (2020-2023), the commits to reducing gaps in adult education and attainment by half for minority, low income, and rural Oregonians. The goal applies to 25 to 64 year olds who are not currently enrolled in a high school equivalency program, attending an institution of higher education, or are in another post-secondary training program.

Other poverty-reduction initiatives include:

- The state's SNAP Employment and Training program at WorkSource Oregon centers uses a case management and customer service approach. It matches SNAP participants with a workforce professional who guides and supports them in their process of obtaining employment.
- The Oregon Individual Development Account (IDA) Initiative, designed to help low-income Oregonians fulfill an educational goal, develop and launch a small business, restore a home to habitable condition, or purchase equipment to support employment. IDA holders work with a participating non-profit organization to define and reach their goals. Oregonians who participate in the program to save funds typically receive a program match of three dollars for every one dollar saved. The matching funds are provided by private contributors through a state tax credit.
- The Local Innovation and Fast Track (LIFT) Housing Program's objective is to build new affordable housing for families with children who are experiencing, or at-risk of homelessness. The Oregon Legislature committed \$40 million of general obligation bonds to fund the program, a new source of affordable housing funding that will have more flexibility than in the past.
- The Housing Stabilization Program (HSP) uses TANF funds and is designed to minimize homelessness by providing short term rental assistance and services to stabilize housing for households with children. The program targets low- and very low-income TANF households with children who are homeless or unstably housed and at-risk of losing

their housing. HSP is a partnership between the Department of Human Services (DHS), Community Action Agencies (CAAs), and Oregon Housing and Community Services (OHCS), and is expected to serve 700 households per fiscal year. HSP payments can be issued to meet the household's needs for housing, transportation, case management, employment-related and self-sufficiency services that cannot be met through other federal or state programs or other resources (such as other income or money in a bank account). The assistance helps families in need to care for children in their homes while promoting self-sufficiency, job readiness and housing stability.

How are the Jurisdiction poverty reducing goals, programs, and policies coordinated with this affordable housing plan

OHCS works in collaboration with non-profit partners and other state departments to reduce the number of families experiencing poverty. In broad terms, as the affordable housing finance agency, OHCS plays an important role in funding the construction of new affordable housing, rehabilitating existing units, weatherizing homes, and providing emergency rental assistance—all programs that reach persons and families below the poverty level.

Business Oregon, through its community/public facilities and microenterprise assistance programs add stability to residents poverty by expanding access to early childhood education, libraries, family resource centers, and business development.

In 2014, OHCS developed a Strategic and Operational Plan to consider how to efficiently and effectively deliver Oregon's housing programs. Guiding principles of this work are that housing investments and safety net services are strategically designed for effectiveness and aligned with other state and local programs, and duplication and fragmentation are minimized. To fulfill these goals the department is developing stronger partnerships with other state and regional agencies and organizations that are invested in moving Oregonians out of poverty. The department also worked to transform the Housing Council, a statewide body whose members are appointed by the Governor, into the Housing Stability Council, reflecting the importance that stable housing has on health outcomes, access to education, employment and the ability to move out of poverty. The Housing Stability Council provides strategic direction for OHCS and provides connections to regional and statewide initiatives—for example, periodically the Housing Stability Council meets jointly with Community Action Partnership of Oregon (CAPO).

OHCS developed the Integrator program to lead our coordination efforts with local and regional housing and poverty programs. An example of this integration is the department's efforts to meet with each Regional Workforce Investment Board to understand their priorities. This work is focused on building relationships between the boards, developers, and service providers to target resources to the people that need them the most.

OHCS will coordinate with the DHS to serve families who are receiving TANF or involved with the Child Welfare department, as well as coordinate with the OHA to serve seniors and people with disabilities who need affordable housing to help them remain stable and healthy. Together, these agencies will shift their work to better align services and housing to improve outcomes for Oregonians with low incomes.

SP-80 Monitoring – 91.330

Describe the standards and procedures that the state will use to monitor activities carried out in furtherance of the plan and will use to ensure long-term compliance with requirements of the programs involved, including minority business outreach and the comprehensive planning requirements

OBDD-IFA monitors CDBG projects before administrative closeout. Monitoring includes assurance of proper funds management, compliance with state and federal regulations, and documentation of program effectiveness. On-site versus a desk review is based on program complexity, local grant administration capacity, recent problems with the project, past monitoring findings, and projects with high-risk activities. The CDBG handbooks may be found at the following link: <http://www.orinfrastructure.org/Infrastructure-Programs/CDBG/Handbooks/>.

OHCS' Portfolio Compliance unit routinely monitors HOME/HTF compliance by conducting regular reviews of tenant files, physical site (including units) and financial asset reviews of HOME/HTF funded projects. At each site-visit, the Compliance Analysts completes a physical inspection of the exterior/interior of buildings, including grounds and common areas, and at least 20 percent of the interior units to ensure that the project is maintained in accordance with HUD, state, and local property standards. The Compliance Analysts will also audit the HOME/HTF assisted unit tenant files to ensure tenant eligibility, at a minimum of 20 percent. The Asset Management Analysts annually review the property's year-end financial reports in addition to any audits completed by the Compliance Analysts to determine risk rating. The compliance manual is available at the following link: <https://www.oregon.gov/ohcs/compliance-monitoring/Documents/compliance/home/Compliance-Manual-HOME-2015.pdf>

ESG sub-grantees are required to comply with the department's, their CoCs, or their own minimum written standards for program operations: evaluating eligibility for assistance; emergency shelter operations; assessing, prioritizing, and reassessing needs for essential services related to emergency shelter; coordination among homeless assistance providers, mainstream service providers and housing providers determining and prioritizing eligibility for homeless prevention and rapid re-housing assistance; determining client's share of rent and utility costs; and determining duration and amount of rental assistance provided to client. The ESG minimum standards are published in the ESG Operations Manual, which is available at the following link: <http://www.oregon.gov/ohcs/CRD/hss/manual-emergency-solutions-grant.pdf>. The ESG-CV manual is in draft form and will be uploaded once finalized.

ESG and HOME TBRA programs require compliance monitoring of sub-grantees annually. Monitoring includes verification that necessary procedures and policies are in place and are being followed by the staff of the service provider, as well as thorough review of information in client files, including confirmation of household eligibility and subsidy calculation.

OHA conducts file reviews for the HOPWA program. The reviews include client case and chart examination and an assessment of the program database records to measure progress in meeting program objectives. OHA holds quarterly meetings that provide staff both training and policy review opportunities. The HOPWA program is administered per the Oregon Housing Opportunities in Partnership Program Policies and Procedures (OAR 333-022-3000):
https://www.oregon.gov/oha/PH/DISEASESCONDITIONS/HIVSTDVIRALHEPATITIS/HIVCARETREATMENT/Documents/Final-OHOP_Program_Manual%2007-01-15.pdf

Program outcomes monitoring occurs according to the program's quality management plan:
<http://public.health.oregon.gov/DiseasesConditions/HIVSTDViralHepatitis/HIVCareTreatment/Documents/care/Quality%20Management%20Plan%202015.pdf>.

Expected Resources

AP-15 Expected Resources – 91.320(c)(1,2)

Introduction

During the 2021 Program Year, the state anticipates receiving the following funding amounts through HUD block grants to help

address the housing and community development needs identified in the Five-year Consolidated Plan.

Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	Public - Federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	\$12,303,168		\$11,945,084	\$24,248,252	\$49,212,672 (4x current year allocation)	
HOME	Public - Federal	Multifamily Acquisition Multifamily rental new construction Multifamily rental rehab TBRA, CHDO Operating Support Grants	\$9,192,486		\$108,574	\$9,301,060	\$36,769,944 (4x current year allocation)	
HTF	Public - Federal	Multifamily Acquisition Multifamily rental new construction Multifamily rental rehab	\$9,816,938				\$39,267,752 (4x current year allocation)	

HOPWA	Public - Federal	Permanent housing placement Supportive services TBRA Housing Information Admin	\$610,989				\$2,443,956 (4x current year allocation)	OHA uses HOPWA funds to meet the permanent housing needs of people living with HIV.
ESG	Public - Federal	Conversion and rehab of emergency shelters Financial Assistance Overnight shelter Rapid re-housing (rental assistance) Homeless Prevention Rental Assistance Services Transitional housing	\$1,940,010				\$7,760,040 (4x current year allocation)	

Expected Resources – Priority Table

Explain how federal funds will leverage those additional resources (private, state and local funds), including a description of how matching requirements will be satisfied

Community Development Block Grant (CDBG):

The CDBG Administrative match requirement will be met by utilizing funds from the Special Public Works Funds which is a state-funded program. While there is no match requirement for projects seeking funding from the CDBG Program, points will be awarded in the competitive application round for projects that leverage funding from other resources. Additionally, for projects where the total cost of the project will exceed the CDBG funding request, applicants must show committed funds to ensure projects can be completed.

HOME Investment Partnerships Program (HOME):

Oregon Housing and Community Services (OHCS) provides tax credits and various gap financing to affordable housing developers. This process encourages creativity in the use of federal, state, and local government resources with private resources to meet the needs of communities. Oregon Housing and Community Services administers the federal LIHTC program, a major funding source for development of affordable housing. Tax credits are leveraged with other state and federal funds through a competitive Notice of Funding Availability (NOFA) process, allowing one application for several resources that are available through OHCS. Oregon Housing and Community Services also administers the non-competitive 4% tax credits used in conjunction with tax-exempt bonds.

Matching funds for the HOME Program come from various state and local resources, including the Oregon Affordable Housing Tax Credit.

Housing Trust Fund (HTF):

There is no non-federal match requirement for the HTF.

Emergency Solutions Grant (ESG):

One hundred percent match is required by the ESG program. Matching contributions for the ESG program may come from many sources, including federal, state, local, and private sources. HOME TBRA can be used as match in very limited circumstances. The following requirements apply to matching contributions from a federal source of funds:

- Adherence to laws and or grant restrictions which govern use of funds for match, ensuring no prohibition to matching federal ESG funds; and
- If ESG funds are used to satisfy matching requirements of another federal program, funding from that program cannot be used to satisfy the match requirements for ESG.

Non-cash matching resources may include the value of the lease on a building, salary paid to staff carrying out the program (paid for with non-ESG dollars), and the value of the time and services contributed by volunteers to carry out the program. OHCS may consider exceptions on a case-by-case basis in consultation with the sub-grantee. ESG program does not generate program income.

Housing Opportunities for People with HIV/AIDS (HOPWA):

As the grantee, OHA works with community housing and social service partners and leverages additional program funding to provide a continuum of HIV services. Housing Opportunities for People with HIV/AIDS funding is leveraged through additional resources. Federal Ryan White Part B funds and general state funds provide households served with insurance assistance, case management services, and wrap around support services. Emergency utility assistance is provided through the state's Low-Income Energy Assistance Program (LIHEAP). The HOPWA program has no match requirement, does not generate any program income, and will not use land or property that is publicly-owned.

If appropriate, describe publicly owned land or property located within the jurisdiction that may be used to address the needs identified in the plan

OHCS does have a land acquisition program, but it is not tied to state land. While Oregon does have a significant amount of state surplus land dedicated to schools, statute requires that buyers of this surplus land pay market rate prices for the land. Ideally, this statute will be altered to prioritize using this land for affordable housing, including opportunities to preserve affordability through below-market land prices.

The 2015 State Legislature passed HB 3524, which requires the state to provide notification to developers of affordable housing when selling or disposing of appropriate real property. The Department of Administrative Services maintains a website with that information:
<https://www.oregon.gov/das/Facilities/Pages/ResLandForSale.aspx>

For other publicly owned land: The state does not control the type of applications received for block grant funds. If publicly owned land is contributed as part of a project, that should be identified in the application and would be considered as match.

Annual Goals and Objectives

AP-20 Annual Goals and Objectives – 91.320(c)(3)&(e)

Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	CDBG - Public Works	2021	2021	Non-Housing Community Development	None	CDBG-Public Works	CDBG: \$6,272,059	2 Projects
2	CDBG – Community/Public Facilities	2021	2021	Non-Housing Community Development and Homeless/Non-Homeless special Needs	None	CDBG-Public/Community Facilities	CDBG: \$2,366,815	2 Project
4	CDBG - Microenterprise Assistance	2021	2021	Non-Housing Community Development	None	CDBG-Microenterprise Assistance	CDBG: \$236,681	50 Businesses Assisted
5	CDBG - Housing Rehabilitation	2021	2021	Affordable Housing	None	CDBG-Housing Rehabilitation	CDBG: \$2,958,518	100 Housing Units
6	CDBG - Community Capacity/ Technical Assistance	2021	2021	Non-Housing Community Development	None	CDBG-Community Capacity/Technical Assistance	CDBG: \$123,032	3 Projects
7	CDBG – Emergency Projects	2021	2021	Non-Housing Community Development	None	CDBG – Emergency Projects		Department will ensure if a bona fide disaster occurs, projects will meet CDBG requirements and will be reported accordingly.
8	Prevent and divert people from becoming homeless	2021	2021	Homelessness Prevention	None	Homelessness Prevention services, financial assistance, rent subsidy and case management	HOME: \$2,206,197 ESG: \$371,842	Tenant-based rental assistance for 400 households Homelessness Prevention for 1,700 persons
9	Reduce homelessness	2021	2021	Homeless	None	Rapid Rehousing with Supportive Services Rental Assistance Shelter Beds and Homeless Services Street Outreach	ESG: \$1,422,668	Tenant-based rental/rapid rehousing assistance for 300 persons; Shelter: 1,500 persons; Street Outreach: 6,500 persons

10	Fund affordable housing	2021	2021	Affordable Housing	None	Accessible Housing Affordable Housing Rehabilitation and Preservation of Units	HOME: 5,867,041 HTF: estimated at \$ 8,835,245	Rental units constructed: 120 Housing Units Rental units rehabilitated: 30 Housing Units Accessible Units: Minimum of five percent of units built.
11	Affirmatively further fair housing	2021	2021	Other / Fair Housing	None	Fair access to housing and housing choice	Agency Wide Expense	OHCS has a Contract with FHCO to provide fair housing services throughout the state.
12	Provide people with HIV/AIDS supportive housing	2021	2021	Other / Supportive housing for people with HIV	None	Permanent Housing with Supportive Services Rental Assistance	HOPWA \$592,659	Tenant-based rental assistance and Supportive Services for 60 households, PHP-15
14	CHDO Operating Support Grant	2021	2021	Affordable Housing	None	Affordable Housing	HOME: \$200,000	To provide operating support grants to 4 certified CHDOs that are actively involved in development of a HOME assisted affordable housing project.
15	Administration	2021	2021	Affordable Housing Administration	None	Accessible Housing Affordable Housing	HOME: 919,248 CDBG: \$346,063 HTF: estimated at \$981,693 HOPWA: \$18,330 HOPWA CARES Act: \$5,119. (CARES Act; award once in 2019) ESG: \$145,500	A percentage of each program allocation is generally allowed for administration costs.

Goals Summary

Goal Descriptions

Table 4 – Goal Descriptions

1	Goal Name	CDBG - Public Works
	Goal Description	Provide sustainable and suitable living environments through enhancements, improvements or construction of water and wastewater systems to provide availability and accessibility to clean, safe drinking water and safe sanitary sewer systems
2	Goal Name	CDBG - Public/Community Facilities
	Goal Description	Rehabilitation or construction of community facilities such as food banks, family resource centers, community centers, senior centers, fire stations or libraries, many of which rarely produce a reliable or sufficient revenue stream to repay a loan.
3	Goal Name	CDBG - Public/Community Facilities
	Goal Description	Rehabilitation or construction of drug and alcohol treatment centers, Head Start facilities, mental health and health clinics, sheltered workshops for people with disabilities, domestic violence shelters, and emergency/homeless shelters.
4	Goal Name	CDBG - Microenterprise Assistance
	Goal Description	Improve economic opportunities through training and classes aimed at improving the conditions and success for business owners the majority of whom will be low-to-moderate income persons.
5	Goal Name	CDBG - Housing Rehabilitation
	Goal Description	Preserve decent housing, improving the sustainability and affordability of existing housing stock, through rehabilitation projects of single-family, owner-occupied homes by providing grants or loans to complete needed repairs, many of which are health and safety related. One hundred percent of the funds in this goal will serve low-to moderate-income homeowners.
6	Goal Name	CDBG - Community Capacity/ Technical Assistance
	Goal Description	Oregon uses one percent of CDBG funds to train and provide technical assistance to several economic development organizations, infrastructure conferences, and other local capacity building events, grant administration workshops, applicant workshops, grant management training, and one-on-one technical assistance.
7		CDBG - Emergency Projects

		<p>The State of Oregon uses CDBG funds to assist in repair or mitigate damage that were a direct result of a qualifying disaster from bona fide emergencies. To be considered a bona fide emergency the situation must be:</p> <ul style="list-style-type: none"> ○ Officially declared by the Governor as a "State of Emergency" needing immediate action; and, or ○ A presidential disaster declaration has been issued for the event <p>Funds for this program is limited to five percent cap of the annual allocation, this fund will be set aside at the time when we see the need.</p>
8	Goal Name	Prevent and divert people from becoming homeless
	Goal Description	<p>Promote services to support people at risk of homelessness and work to prevent homelessness through increased housing stability using services that include but are not limited to: security and utility deposit payment, rent subsidy, and case management and self-sufficiency opportunities. Acknowledge that preventing individuals and families from becoming homeless is critical to ending homelessness. Every episode of homelessness that can be averted spares men, women, and children the psychological and physical trauma of not being housed.</p>
9	Goal Name	Reduce homelessness
	Goal Description	<p>Promote programs that reduce homelessness through homeless prevention services such as financial and rent assistance, and re-house people experiencing homelessness into permanent housing. Rapid re-housing places a priority on moving a family or individual experiencing homelessness into permanent housing as quickly as possible, ideally within 30 days of becoming homeless and entering a program. OHCS Homeless Services funds provide rent assistance and pay security deposits. Both homelessness prevention and rapid rehousing services couple financial and/or rent assistance with case management and self-sufficiency opportunities. Clients may be provided referrals to agencies that can help address, mitigate and possibly alleviate other barriers causing housing instability.</p>
10	Goal Name	HOME and HTF- Fund affordable housing
	Goal Description	<p>Oregon HOME and HTF funds are used to finance the development of affordable housing for low income households, HTF funds are focused largely on extremely low income households. Funds can be used for new construction, acquisition and rehabilitation. The HOME and HTF programs meet the accessibility requirements of section 504 of the Rehabilitation Act.</p>
11	Goal Name	Affirmatively further fair housing

	Goal Description	Work diligently to promote fair housing and access to housing choice for all Oregonians. Take meaningful action to overcome patterns of segregation and promote inclusive communities free of barriers to opportunity. OHCS is committed to distributing resources and supporting programs to address housing inequities and disparities experienced by communities of color and other underserved communities.
12	Goal Name	Provide people with HIV/AIDS supportive housing
	Goal Description	HOPWA funds will meet the permanent housing needs of people living with HIV through provision of tenant based rental assistance, supportive services and permanent housing placement, to include deposits. HOPWA funding will be leveraged through federal Ryan White Part B funds and general state funds to provide insurance assistance, case management services, and wrap around support services.
13	Goal Name	Provide people with HIV/AIDS relocation services and temporary lodging
	Goal Description	OHA will meet the needs of people living with HIV (PLWH) and their households through the provision of temporary lodging services through hotel/motel stays for COVID response. Funds for this program are from the CARES Act and are reflected in 2019 Action Plan (Amended) resources; this activity will continue into the 2021-2026 program years. Payment for hotel/motel stays will be for the purpose of isolation and quarantine to support the health of a PLWH who is vulnerable to COVID-19. OHA will fund short term hotel/motel stays for: a) unhoused HOPWA-eligible individuals or households needing to stabilize their health and wellness, or b) current OHOP clients (receiving TBRA) or their household member, regardless of HIV status, who need to quarantine separately from their household per the recommendation of their medical provider.
14	Goal Name	Provide support grants to certified CHDOs
	Goal Description	Five percent of the HOME allocation will be used to provide operating support grants to certified CHDOs that are actively involved in development of a HOME assisted affordable housing project.
15	Goal Name	Administration
	Goal Description	State Administration of various programs.

AP-25 Allocation Priorities – 91.320(d)

Introduction:

Oregon will make the following HUD funds available through the five programs included in this plan. HUD funds will be used in conjunction with other federal, state, and local funding to maximize investments in affordable housing and community development activities.

Funding Allocation Priorities

	CDBG*	HOME	HTF	HOPWA	ESG
CDBG – Public Works (%)	51	0	0	0	0
CDBG – Public/Community Facilities	20	0	0	0	0
CDBG – Housing Rehabilitation (%)	25	0	0	0	0
CDBG – Micro-enterprise (%)	2	0	0	0	0
CDBG – Community Capacity/Technical Assistance (%)	1	0	0	0	0
Prevent and divert people from becoming homeless (%)	0	24	0	0	19
Reduce homelessness (SL1) (%)	0	0	0	0	73
Fund affordable housing (%)	0	64	90	0	0
Support Grants for CHDOs	0	2	0	0	0
Provide people with HIV/AIDS supportive housing and COVID-19 relocation services (%)	0	0	0	97	0
Provide people with HIV/AIDS and their households impacted by COVID-19 relocation services and temporary lodging					
Affirmatively further fair housing (%)	0	0	0	0	0

Administration	2	10	10	3	8
Total (%)	100	100	100	100	100

* The CDBG calculation is shows the distribution after removing 2% of funds for state administration and \$100,000 in recaptured funds.

Reason for Allocation Priorities

CDBG priorities were identified based on previous program demands, past experience, and OBDD-IFA's cost/benefit analysis. By allocating the funds in this manner, it provides the state investment flexibility. OBDD-IFA is not obligated to award all the funds allocated to a particular priority or category. If a sufficient number of projects are not awarded in a particular category, applications in other categories may be funded. Each quarter the agency will conduct a target review to determine if funds should be moved from one category to another. Allocation priorities were also based on the projected available funds from the annual funding allocation reduced by an average of two percent.

OHCS funding priorities have been established based on the depth of need for affordable rental housing resources in the community. TBRA is allocated through a network of Community Action Agency partners in order to provide a means for housing supports to be used with locally available housing stock.

The majority of the HOME funding is used to finance the development of multifamily housing in the Balance of State, where there is a tremendous amount of unmet need for affordable rental housing. A small portion of the HOME funds are to support Community Housing Development Organizations in order to ensure performance, and the state's ability to meet funding requirements.

Consistent with HOME priorities, HTF funds will be used to finance units affordable to those who are extremely low income and can be used for LIHTC projects. The state HTF funds are to be available for investment statewide.

The percentages for the ESG and HOME TBRA goals are determined by what subgrantees submit to OHCS through the funding application process. Applications are reviewed by program staff for organizational capacity, needs-based population targeting, utilization of the funds, and feasible program strategies which meets federal and state delivery requirements and priorities. Additionally, each subgrantee's knowledge of community needs, extent of engaged partners, historical delivery capacity and success are reviewed. Funds are allocated by formula using three criteria: severe housing burden, poverty and homelessness, and made available upon approval of each subgrantee's application and execution of their MGA. The funding formula utilizes three data elements for ESG: severe housing burden, poverty, and homelessness, and four for HOME TBRA: housing burden, severe housing burden, poverty, and income below 50 percent median.

Oregon encourages the Housing First approach and the prioritization of ESG funding for rapid

re-housing within the context of local needs and affordable housing capacity. The state's increasing severe shortage of affordable housing has forced subgrantees to spending towards prevention and shelter, which is reflected in the allocation priorities.

COVID-19 has exacerbated the existing homelessness crisis, adding households experiencing job loss and health issues to the homeless and at-risk populations. To address this crisis by targeting the use of funds, OHCS released ESG-CV funds in two phases. In the first phase, OHCS rapidly deployed \$6.7 million to Community Action Agencies (CAAs). In the second phase, OHCS allocated \$7 million to the CAA network and is offering \$42.4 million in a Request for Applications process. Any non-profit shelter provider, service agency or other community group striving to serve specialized populations impacted by COVID-19 is able to submit an application. These ESG-CV resources will play a crucial role in addressing the needs of people experiencing homelessness during the COVID-19 pandemic, supporting the non-congregate shelter system, and bridging gaps in service delivery.

Housing Opportunities for People with HIV/AIDS program funds are distributed in 31 counties outside of the Portland Metropolitan Statistical Areas (MSAs). Funds are provided through direct payments to property managers on behalf of participating clients. Housing Opportunities for People with HIV/AIDS program funded activities address program objectives by providing permanent supportive housing and relocation or temporary lodging assistance for people living with HIV/AIDS, and their families, through rental assistance, hotel/motel assistance, and supportive services. These include housing placement services, case management in the form of benefits coordination, housing stability planning and housing information services. As the grantee, Oregon Health Authority (OHA) works with community housing and social service partners, and leverages additional program funding to provide a continuum of HIV services.

How will the proposed distribution of funds will address the priority needs and specific objectives described in the Consolidated Plan?

CDBG Section 106(d)(2)(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 does allow a state to establish funding priorities among the types of eligible activities. In accordance with the HCDA, the state will consider applications for funding consistent with the identified funding priorities within the CDBG Method of Distribution (MOD). A copy of the MOD may be found in the Appendix to this Plan.

The top priority needs to be addressed with CDBG funds are public works (53% of funds), housing rehabilitation (25%), community and public facilities (20%). Funds will also be allocated to microenterprise assistance (2%), technical assistance (1%), and, as needed emergency needs. Priority of need was based on responses and information received through public outreach and

consultation with advocacy groups, non-profit partners, and topical research. Details about CDBG allocation priorities can be found in the Appendix.

HOME funding priorities are designed to specifically address objectives of increasing and preserving the states affordable housing resources, and providing rental assistance directly to the communities.

OHCS HOME funds are used to provide rent assistance, develop multifamily housing, and to support Community Housing Development Organizations in order to best meet the established goals and objectives.

The funding allocation priority for HOME TBRA is to provide rental assistance that will stabilize housing for very low income households at risk of becoming homeless. The amount of HOME TBRA allocated to subgrantee is based on four criteria: the percentage of households in a subgrantee's service area with housing burden, severe housing burden, income below federal poverty level, and income at or below 50 percent median household income.

HTF will be leveraged with other federal and state funding. It will be made available through OHCS annual LIHTC and HOME NOFA as an additional source of funding for multifamily rental housing projects to serve extremely low income (ELI) households.

The distribution of ESG funds to prevent and divert people from becoming homeless, will address the priority need for rent assistance and related costs necessary for people at-risk of homelessness to retain and secure permanent housing. Priority populations will continue to be served based on historical service data. Approximately 35 percent of those receiving ESG prevention services will represent special populations including veterans, victims of domestic violence, elderly, people with HIV/AIDS and the chronically homeless. Fifty-one percent of ESG recipients have a disability, including severe mental illness and chronic substance abuse. By HUD requirement, all recipients of ESG prevention services will be extremely low income.

Distribution of ESG funds to reduce homelessness addresses three priority needs: rapid rehousing with supportive services, rent assistance and shelter beds and homeless services. ESG funds dedicated to this goal will provide shelter facilities and operations, housing relocation and stabilization financial assistance and services, and short- and medium-term rental assistance. Based on historical data, it is estimated that approximately 40 percent of the served population will qualify as a special population and half percent will have a disability. Those served within this goal will be extremely low income.

Housing Opportunities for Persons with HIV/AIDS funded activities address program objectives by providing permanent supportive housing for people living with HIV/AIDS, and their families,

through rental assistance and supportive services. Provision of HOPWA funds are based on client acuity, ensuring funds are prioritized for those with the greatest need.

AP-30 Methods of Distribution – 91.320(d)&(k)

Introduction:

This section summarizes the Methods of Distribution (MOD)—or the programs to which funds are proposed to be allocated—during the 2021 Program Year. Specific program and application requirements are detailed in the Appendix.

Distribution Methods Program

Table–6 - Distribution Methods by State Program

1	State Program Name:	CDBG
	Funding Sources:	CDBG
	Describe the state program addressed by the Method of Distribution.	CDBG funded activities include public works, community/public facilities, housing rehabilitation, microenterprise assistance, community capacity/technical assistance and emergency projects.
	Describe all of the criteria that will be used to select applications and the relative importance of these criteria	CDBG specifies the program requirements and application criteria in a detailed manner within the CDBG MOD.
	If only summary criteria were described, how can potential applicants access application manuals or other state publications describing the application criteria? (CDBG only)	The State's CDBG MOD is designed in such a way that it encompasses all aspects of program eligibility; federal requirements through application process.
	Describe the process for awarding funds to state recipients and how the state will make its allocation available to units of general local government, and non-profit organizations, including community and faith-based organizations. (ESG only)	Not applicable to CDBG.
	Identify the method of selecting project sponsors (including providing full access to grassroots faith-based and other community-based organizations). (HOPWA only)	Not applicable to CDBG.
	Describe how resources will be allocated among funding categories.	CDBG-Targeted allocation of funds provides Business Oregon investment flexibility and is based on previous demand and the department's cost/benefit analyses. After each quarterly

		round, Business Oregon conducts a targeted review to determine if funds need to be transferred from one funding category to another to address community needs. Targeted funding does not obligate Business Oregon to award all the funds targeted to each category. If a sufficient number of projects are not awarded in a particular category, applications in other categories may be funded.
	Describe threshold factors and grant size limits.	CDBG- There are multiple threshold factors to be considered and scoring preferences vary by project. Demonstrated project need and readiness are top considerations. Grant size limits for 2021 are as follows: public works projects-\$2,500,000; community/public facilities-\$1,500,000; housing rehabilitation-\$400,000 with a \$100,000 incentive focused on repairs in manufactured parks; and microenterprise-\$100,000. While these are the maximum grants allowable, other determining factors such as need and availability of funds are taken into consideration during the award process. Detailed information can be found in the appended MOD.
	What are the outcome measures expected as a result of the method of distribution?	CDBG - The primary objective of Oregon's CDBG program is to continuously develop viable communities by providing decent housing (DH); suitable living environments (SL) and expanding economic opportunities (EO) for low and moderate income persons residing within the State's non-entitlement jurisdictions.
2	State Program Name:	Emergency Solutions Grant/Emergency Solutions Grant - Coronavirus
	Funding Sources:	ESG and ESG-CV
	Describe the state program addressed by the Method of Distribution.	Emergency Solutions Grant (ESG) funds are used to assist individuals and families regain housing stability after experiencing a housing crisis, homelessness, or being at risk of homelessness. Support can include, but is not limited to, outreach, shelter, essential services, transitional housing, permanent housing, rental assistance, case management, and assistance with self-sufficiency opportunities.
	Describe all of the criteria that will be used to select applications and the relative importance of these criteria.	Once HUD approves Oregon's Annual Action Plan, OHCS receives a lump sum allocation for the ESG program. Sixteen private nonprofits and local government entities are eligible for these funds, and apply to OHCS biennially. Each applicant is awarded funds based on a formula which considers three data elements for each county served by the organization: severe housing burden, poverty, and homelessness. Data from the Census 2015 American Community Survey, Gross Rent as a Percentage of Household Income in The Past 12 Months report, the Census SAIPE Program 2015 Poverty and Median Household Income Estimates report, and the 2015 and 2017 Point-In Time Count is used to calculate each county's percentage of the state's severe housing burden, poverty and homelessness. Further, the

	<p>percentage for each county is weighted for severe housing burden at 30 percent, percentage in poverty at 45 percent, and number counted as homeless at 25 percent. This calculation is then used to determine the percentage of the State’s ESG allocation that will be awarded to each county. Applicants may serve more than one county, and once county allocations are known, OHCS calculates the percentage of the State’s ESG allocation that will be awarded to each applicant. A portion of ESG-CV is allocated to the CAA network via the same weighted process. A greater portion of ESG-CV is being offered to eligible agencies and providers through a RFA process.</p>
<p>If only summary criteria were described, how can potential applicants access application manuals or other state publications describing the application criteria? (CDBG only)</p>	<p>Not applicable to ESG.</p>
<p>Describe the process for awarding funds to state recipients and how the state will make its allocation available to units of general local government, and non-profit organizations, including community and faith-based organizations. (ESG only)</p>	<p>Oregon Housing and Community Services (OHCS) administers federal and state homeless program funds including Emergency Solutions Grants, Emergency Housing Assistance, State Homeless Assistance Program, Housing Stabilization Program, Elderly Rental Assistance, Veterans’ Assistance, and Home Tenant-Based Rental Assistance. The distribution of these program funds is done through a Master Grant Agreement funding application process between OHCS and its Community Action Agency subgrantees. In compliance with Oregon legislative mandate, Oregon Housing and Community Services is required to utilize the Community Action Agency network as its primary service delivery mechanism at the local level. The Master Grant Agreement is the legal, contractual agreement utilized for disbursement of OHCS administered anti-poverty grant funds.</p> <p>Subgrantees coordinate with multiple local and statewide partners to establish linkages that maximize housing stabilization efforts and address the diversity of needs of homeless persons while avoiding duplication of services. Reporting and tracking of the linkages is completed annually by each subgrantee and includes narrative descriptions of the linkages and numbers of clients served by type of linkage service. These linkages supplement the state’s federal and state homeless programs resulting in enhanced services including: utility and weatherization services, Temporary Assistance for Needy Families (TANF), Head Start, family support, medical care, assistance through homeless school liaisons, workforce and job assistance, emergency food and nutrition education, child welfare support, and volunteer time and in-kind donations.</p>
<p>Identify the method of selecting project sponsors (including providing full access to grassroots faith-</p>	<p>Not applicable to ESG.</p>

	based and other community-based organizations). (HOPWA only)	
	Describe how resources will be allocated among funding categories.	During the funding application process, the subgrantee applicants submit work plans and budgets to indicate the services they will provide with their ESG funding. The budgets are divided by funding category. If the categorical division of services is approved, funds are allocated in those categorical amounts. Oregon Housing and Community Services (OHCS) staff ensures the division of funds to all ESG categories conforms to the limitations of 24 CFR 576.100.
	Describe threshold factors and grant size limits.	Upon approval of each subgrantee's application and execution of the Master Grant Agreement (MGA), funds are distributed by formula through a notice of allocation to the subgrantee. The current funding formula utilizes three data elements: severe housing burden, poverty, and homelessness.
	What are the outcome measures expected as a result of the method of distribution?	Emergency Solutions Grant (ESG) subgrantees are required to report on two performance measures: 1) the percentage of total program participants served who reside in permanent housing at time of exit from program (goal of 30 percent). and 2) The percentage of program participants who at program exit reside in permanent housing and maintain permanent housing for six months from time of exit (goal of 80 percent).
3	State Program Name:	HOME
	Funding Sources:	HOME
	Describe the state program addressed by the Method of Distribution.	HOME Investment Partnerships Program (HOME) funds for multifamily development are allocated through annual competitive Notices of Funding Availability. Oregon Housing and Community Service's HOME funds may be invested in the HOME Balance of State, which is the geographic area of the State not covered by another Participating Jurisdiction. HOME Investment Partnerships Program Tenant Based Rental Assistance (HOME TBRA) provides funds for rental assistance and deposits for low income households. HOME TBRA is allocated to fifteen community action agencies and housing authorities across the state. The program provides medium-term rent assistance.
	Describe all of the criteria that will be used to select applications and the relative importance of these criteria.	In addition to meeting a variety of threshold measures, applicants are assessed against a series of competitive criteria. The overall structure of competitive criteria looks at need (20%), impact (40%), preferences (10%), financial viability (15%), and development team capacity (15%). Need examines the need for the project, its target population, and the current supply of affordable housing in the target area. Impact identifies ties to local and statewide planning efforts and initiatives as well as the services for residents and location efficiency. Preferences examine the extent to which a project serves those

	<p>with the lowest incomes, and is located in areas that provide opportunity. Financial viability examines the pro forma and capacity, and looks at the sponsor and management agent's portfolio performance. The goal is to fund new, or preserve existing affordable housing resources, that are sustainable, address the housing needs, and have a positive impact on the residents.</p> <p>The HOME TBRA funding formula is defined by four criteria: housing burden, severe housing burden, households below federal poverty level, and households at or below 50 percent median family income (MFI).</p>
If only summary criteria were described, how can potential applicants access application manuals or other state publications describing the application criteria? (CDBG only)	Not applicable to HOME.
Describe the process for awarding funds to state recipients and how the state will make its allocation available to units of general local government, and non-profit organizations, including community and faith-based organizations. (ESG only)	Not applicable to HOME.
Identify the method of selecting project sponsors (including providing full access to grassroots faith-based and other community-based organizations). (HOPWA only)	Not applicable to HOME.
Describe how resources will be allocated among funding categories.	HOME Investment Partnerships Program (HOME) funds will be allocated to Community Action Agencies for Tenant Based Rental Assistance, to eligible housing developers on a per project basis to increase and preserve multifamily rental housing, and through operating support grants to Community Housing Development Organizations (CHDOs). The percentages associated with each of these activities have been determined based on overall need, as well as historic performance and future expectations.
Describe threshold factors and grant size limits.	There are numerous threshold factors considered in the HOME Program. For multifamily housing development these are described in the Notice of Funding Availability (NOFA). Threshold measures include readiness to proceed, development team capacity, ownership integrity, total development cost per unit, and a program compliance review to ensure the project will meet established HOME program rules and regulations that apply to all OHCS programs, such as compliance with established rehabilitation standards. Eligible applicants for the state's HOME program include local governments, non-profit organizations, and for-profit developers, including but not limited to cities, counties, housing authorities, service providers,

		<p>community based organizations such as CHDOs, community development corporations, and Community Action agencies. Any specific funding restrictions are established in individual NOFAs as applicable.</p> <p>HOME Investment Partnerships Program Tenant Based Rental Assistance (HOME TBRA) funds are allocated to members of the Community Action Agency network for service delivery at the local level. Funds are allocated by formula, using four criteria: housing burden, severe housing burden, poverty, and income at or below 50 percent median family income (MFI).</p>
	What are the outcome measures expected as a result of the method of distribution?	The program funds are expected to have outcomes that meet the objectives of providing decent affordable housing, and creating suitable living environments.
3	State Program Name:	Housing Trust Fund (HTF)
	Funding Sources:	National Housing Trust Fund
	Describe the state program addressed by the Method of Distribution.	Housing Trust Fund (HTF) funds for multifamily development are allocated through annual competitive Notices of Funding Availability (NOFA). The HTF is available statewide; however the limited number of dollars available will result in only a few projects being funded annually.
	Describe all of the criteria that will be used to select applications and the relative importance of these criteria.	In addition to meeting a variety of threshold measures applicants are assessed against a series of competitive criteria. The overall structure of competitive criteria looks at need (20%), impact (40%), preferences (10%), financial viability (15%), and capacity (15%). Need examines the need for the project, its target population, and the current supply of affordable housing in the target area. Impact identifies ties to local and statewide planning efforts and initiatives as well as the services for residents and location efficiency. Preferences examine the extent to which a project serves those with the lowest incomes, and is located in areas that provide opportunity. Financial viability examines the pro forma and capacity, and looks at the sponsor and management agent's portfolio performance. The goal is to fund new, or preserve existing affordable housing resources that are sustainable, address the housing needs, and have a positive impact on the residents. Information about the affordability requirements and the criteria can be found in Appendix of the Consolidated Plan.
	If only summary criteria were described, how can potential applicants access application manuals or other state publications describing the application criteria? (CDBG only)	Not applicable to HTF.
	Describe the process for awarding funds to state recipients and how the state will make its allocation	Not applicable to HTF.

	available to units of general local government, and non-profit organizations, including community and faith-based organizations. (ESG only)	
	Identify the method of selecting project sponsors (including providing full access to grassroots faith-based and other community-based organizations). (HOPWA only)	Not applicable to HTF.
	Describe how resources will be allocated among funding categories.	Housing Trust Fund funding will be allocated to specific eligible projects, on a statewide basis, through the established competitive NOFA process currently utilized by OHCS to allocate LIHTC and HOME funds.
	Describe threshold factors and grant size limits.	There are numerous threshold factors that will be considered in the HTF Program. For multifamily housing development these are described in the NOFA. Threshold measures include readiness to proceed, development team capacity, ownership integrity, total development cost per unit, and a program compliance review to ensure the project will meet established HTF program rules and regulations that apply to all OHCS programs, such as compliance with established rehabilitation standards. 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.
	What are the outcome measures expected as a result of the method of distribution?	The program funds are expected to have outcomes that meet the objectives of providing decent affordable housing, and creating suitable living environments.
5	State Program Name:	Housing Opportunities for Persons with HIV/AIDS
	Funding Sources:	HOPWA
	Describe the state program addressed by the Method of Distribution.	Oregon Health Authority (OHA) is the grantee for HOPWA formula funding and directly carries out program implementation.
	Describe all of the criteria that will be used to select applications and the relative importance of these criteria.	Oregon Health Authority (OHA) is the grantee for HOPWA formula funding and directly carries out program implementation.
	If only summary criteria were described, how can potential applicants access application manuals or	Not applicable to HOPWA.

other state publications describing the application criteria? (CDBG only)	
Describe the process for awarding funds to state recipients and how the state will make its allocation available to units of general local government, and non-profit organizations, including community and faith-based organizations. (ESG only)	Not applicable to HOPWA.
Identify the method of selecting project sponsors (including providing full access to grassroots faith-based and other community-based organizations). (HOPWA only)	Oregon Health Authority (OHA) is the grantee for HOPWA formula funding and directly carries out program implementation. Oregon Health Authority does not administer the program through project sponsors.
Describe how resources will be allocated among funding categories.	Oregon Health Authority allocates HOPWA Formula awards based on historical need, taking into consideration the number of clients served in the prior budget period, projected changes to the number of clients served, average costs per client, and projected changes to those average costs. Utilizing current year funding, in conjunction with carry-over from the preceding budget year, OHA maximizes utilization of funds under the program's capacity. After allocating across all funded service types based on future year projections, OHA allocates any remaining funds from the formula award to TBRA as the program sees the most variation in the projections and it is the highest utilized service. The CARES Act formula award will fund relocation and temporary lodging only.
Describe threshold factors and grant size limits.	Oregon Health Authority does not utilize a request for proposal process
What are the outcome measures expected as a result of the method of distribution?	Oregon Health Authority utilizes the standard outcome measures provided by the HOPWA program: the number of clients with a housing plan, number with case management contact in accordance with the standards of service, number who had contact with a primary health care provider, number who accessed and maintained medical insurance, and number who accessed or maintained a source of income.

AP-40 Section 108 Loan Guarantee – 91.320(k)(1)(ii)

Will the state help non-entitlement units of general local government to apply for Section 108 loan funds?

No.

Available Grant Amounts

Not applicable.

Acceptance process of applications

Oregon's CDBG Section 108 Loan Guarantees are not currently identified as a priority of funding.

AP-45 Community Revitalization Strategies – 91.320(k)(1)(ii)

Will the state allow units of general local government to carry out community revitalization strategies?

No.

State’s Process and Criteria for approving local government revitalization strategies

Under the state’s CDBG program, Community Revitalization Strategies are not a priority. However, units of general local government (UGLG) can develop revitalization strategies with non-CDBG funds. Further, if a component of the strategy fits within the CDBG funding priorities, as outlined in the MOD, and is eligible for funding under the CDBG program (e.g., upgrade city wastewater system, rehabilitate a community facility, etc.), the UGLG could apply for assistance under the CDBG for that component of the identified revitalization plan.

AP-50 Geographic Distribution – 91.320(f)

Description of the geographic areas of the state (including areas of low-income and minority concentration) where assistance will be directed

Oregon does not target specific geographic areas for funding, however, funding is provided throughout the non-entitlement areas of the state. OHCS's ESG and HOME TBRA program funds are allocated to community action agencies. This network of service agencies covers every county in the state. No other geographical considerations are used when determining allocation of these funds. ESG is not allocated to Clackamas County and in some instances, HOME TBRA can be used for residents of a county but not a particular city in the county, as the city receives its own HOME funds.

Rationale for the priorities for allocating investments geographically

The funds for the CDBG, HOME, HTF, ESG, and HOPWA programs are not allocated using geographic priorities. Oregon is committed to ensuring public resources are invested in a way that is responsive to the diversity of low-income housing needs, public infrastructure, community facilities and microenterprise needs around the state.

Community Development Block Grant (CDBG):

CDBG funds are awarded on an annual basis to eligible units of general local government in the non-entitlement areas of the state. If sufficient funds remain from an application round, another application round may be opened. If an additional competitive application round will be held, notice will be provided to all known eligible applicants via website postings, e-newsletters, and listserv distributions. Allocations are made through a competitive application process. Details of this process can be found in the CDBG Method of Distribution (MOD).

The MOD is included in the Grantee Unique Appendix.

HOME Investment Partnerships Program (HOME):

HOME funds for multi-family projects are distributed on a competitive basis through the NOFA application process to any qualified project located in a jurisdiction that does not directly receive HOME program funds from HUD (the Balance of State).

Up to 24 percent of HOME funds are allocated to Tenant Based Rental Assistance (HOME TBRA) to serve households at or below 50 percent median family income (MFI). HOME Tenant Based Rental Assistance allocations are determined using a formula established by a strategic need analysis which factors in the percentage of cost-burdened, severely cost burdened poverty level households, and households with 50 percent or less median income. HOME Tenant Based

Rental Assistance is allocated to subgrantees in the non-entitlement areas of the state. Each subgrantee may coordinate with local entitlement areas to permit participating households to use the assistance outside the subgrantee's boundaries if the jurisdictions involved so choose.

Housing Trust Fund (HTF):

HTF funds are also distributed on a competitive basis through the NOFA application process to any qualified project in the state. Geographic measures of needs are based on the percentage of the state's severe rent burdened and low-income renter households in each city or county (need distribution), the sum of the city and county funded affordable housing units (affordable housing inventory), and a comparison of the actual distribution of the affordable housing units to how the affordable housing units would be distributed using the need distribution calculation (underserved geography calculation).

Emergency Solutions Grant (ESG):

Distribution of ESG funds follow an allocation formula based on the percentage of the state's severely rent-burdened households in each county, the homeless count, and economically disadvantaged households. Economically disadvantaged households are defined as a percent of total households based on the number of persons living below the federal poverty line reported in the Census Bureau's Small Area Income and Poverty Estimates report. A portion of ESG-CV is allocated to the CAA network via the same weighted process. A greater portion of ESG-CV is being offered to eligible agencies and providers through a RFA process.

Housing Opportunities for People with HIV/AIDS (HOPWA):

Housing Opportunities for People with HIV/AIDS funds are distributed based on client acuity, and made through direct payment to property managers on behalf of participating clients. Clients are prioritized for assistance based on their assessed need. The distribution of resources closely aligns with the HIV prevalence in the Balance of State.

Affordable Housing

AP-55 Affordable Housing – 24 CFR 91.320(g)

Introduction:

One Year Goals for the Number of Households to be Supported	
Homeless	300
Non-Homeless	650
Special-Needs	60
Total	1010

One Year Goals for Affordable Housing by Support Requirement

One Year Goals for the Number of Households Supported Through	
Rental Assistance	760
The Production of New Units	120
Rehab of Existing Units	130
Acquisition of Existing Units	0
Total	1010

One Year Goals for Affordable Housing by Support Type

Discussion:

The CDBG one year goals for the number of households supported through rehab of existing units is 100, and is based on past years' activities. The CDBG program funding of housing-related activities is limited to low-and moderate income, single-family owner-occupied homes; a minimal amount of the overall CDBG program. Rehabilitation of existing single-family, owner-occupied, units will be funded primarily through CDBG resources within the CDBG Housing Rehabilitation program administered by OBDD-IFA.

Oregon Housing and Community Services, through the HOME program, expects to produce 60 new units, and acquire and rehabilitate 30 existing units. The HTF is expected to produce 60 units that will serve extremely low income households.

Oregon's HOPWA program helps create a continuum of stable, sustainable housing for people living with HIV/AIDS. The objective of HOPWA is to assist households in establishing and maintaining a stable living environment that is safe, decent and sanitary, reducing the risks of

homelessness, and improving access to HIV treatment and other health care and support. Housing Opportunities for People with HIV/AIDS promotes client housing stability and acts as a bridge to long-term assistance programs such as The Housing Choice Program (formerly known as Section 8), or to self-sufficiency. In 2021, OHA will support 60 households with tenant based rental assistance through HOPWA formula funds. OHA will support 8 households per year (20 households over 3 years, 2019-2022) with hotel/motel assistance through HOPWA formula CARES Act funds.

AP-60 Public Housing - 24 CFR 91.320(j)

Introduction:

OHCS is a state housing finance agency and does not manage public housing.

Actions planned during the next year to address the needs to public housing

Actions to address the needs for public housing are performed by Oregon's Public Housing Authorities; however, Oregon, through OHCS, contributes financial or community resources to Public Housing projects through LIHTC, tax-exempt conduit bond loans, Oregon Affordable Housing Tax Credit (OAHTC), and through other state funding opportunities, generally on a competitive basis.

OHCS has engaged with PHAs and is providing set aside preservation and 4% LIHTC dollars for PHA's participating in the Rental Assistance Demonstration (RAD) program. OHCS is working closely with these PHAs to help them leverage the resources they need to preserve assisted rental housing in Oregon. This process has involved outreach, education and financial planning at both the Housing Authority and state level.

Actions to encourage public housing residents to become more involved in management and participate in homeownership

Actions to encourage public housing residents to become more involved in management, and participate in homeownership, are primarily performed by Oregon's Public Housing Authorities. However, Oregon's Individual Development Account (IDA) program is available to residents of public housing and provides state sponsored financial incentives to achieve self-sufficiency goals including homeownership.

If the PHA is designated as troubled, describe the manner in which financial assistance will be provided or other assistance

Public housing authorities (PHAs) located in Oregon that are designated as troubled by HUD work directly with HUD to resolve any issues. OHCS has the ability to utilize state funding such as the General Housing Account Program to provide technical assistance to troubled PHA's in Oregon if necessary. No formal program has materialized as of this date.

AP-65 Homeless and Other Special Needs Activities – 91.320(h)

Introduction

OHCS, through its Community Action Agency (CAA) network and other service providers, uses ESG and ESG-CV funds for street outreach, emergency shelter, , rapid re-housing, homelessness prevention, and data collection and reporting. Emergency Solutions Grant funds are used in conjunction with other state and federal homeless funds to provide a continuum of services with an emphasis on rapid re-housing and housing stabilization. Oregon’s housing crisis has forced grantees to shift priorities to homeless prevention as affordable permanent housing for those transitioning out of homelessness is increasingly difficult to obtain.

To meet the unmet housing need for people with extremely low incomes, Oregon would need to build 102,500 new units (2019 estimate), and preserve all existing subsidized units. In a time when vacancy rates are exceptionally low, people and families face significant housing instability. Flat wages, in conjunction with rapidly increasing housing and transportation costs, mean fewer resources are available for people to meet their basic needs of food, clothing, and medicine. The state’s priority populations for the 2019-21 biennium will be homeless families with children and homeless veterans.

Oregon communities identified bringing water and public infrastructure into compliance with local and federal regulations as their highest priority for non-housing and community development needs funded by the CDBG program. Oregon communities also identified the need to address homelessness and efforts to reduce the causes of homelessness as significant. To that end, within the CDBG program, housing rehabilitation, domestic violence shelters, Head Start and food bank projects are considered to be a higher priority for the program. Housing Rehabilitation repairs help to maintain existing housing stock for low- to moderate- income persons thereby reducing the potential likelihood of homelessness or home insecurity. Similarly, the Community Facility type projects identified above, provide safe shelter and assistance to reduce food insecurity and potential homelessness.

The 2021-2025 Consolidated Plan is designed to help jurisdictions develop a strategic plan to address their housing and non-housing community development needs. The strategic plan builds on the findings of the Needs Assessment and Market Analysis by requiring that the state develop goals to meet the needs of the communities HUD serves. The strategies and goals of the plan were developed in partnership with the community, and with an eye toward social equity. This work is built on the foundation of the 2021 Analysis of Impediments to Fair Housing Choice and will inform the Statewide Housing Plan (ORS 456.572), the planning work of the Oregon Health Authority, and that of OBDD-IFA.

The Annual Action Plans (AAP) describes the goals associated with the federal funding received

through Consolidated Plan programs and the companion Consolidated Annual Performance and Evaluation Reports (CAPER/PER) details the extent to which the state of Oregon was able to achieve those stated goals.

Describe the jurisdictions one-year goals and actions for reducing and ending homelessness including:

Reaching out to homeless persons (especially unsheltered persons) and assessing their individual needs

Oregon Housing and Community Services (OHCS), together with the Community Action Agencies (CAAs) and other service providers across the state, use Emergency Solutions Grant Program (ESG) funds to assist individuals and families regain housing stability after experiencing a housing crisis or homelessness. These groups work together to meet the needs of the homeless population.

Even though the priority is to use ESG funding to quickly re-house homeless families with children and homeless veterans through either rapid re-housing or Housing First activities, Oregon faces a homelessness crisis. Outreach by CAAs to unsheltered persons is crucial and is an approved use of ESG funds. Outreach includes making homeless people aware of resources available to them, and connecting them to those resources. The types of outreach a service provider will use depends on the community, demographics, and special needs of the populations being served. It's imperative that service agencies understand the demographics of the people living in their service areas. Oregon Housing and Community Services requires all ESG subgrantees to submit an Affirmative Outreach Plan (24 CFR 576.407(b)), as well as a written statement or plan for assisting applicants and clients with Limited English Proficiency (LEP) requirements. In conjunction with annual Point in Time counts, many OHCS ESG subgrantees conduct a Project Connect-type event as an outreach tool to provide services for people who are homeless or at risk of homelessness. Project Connect, and similar one-or two-day events, offer a one-stop location where people experiencing or at-risk of homelessness can receive specialized services such as medical and dental care, hot meals, food boxes, clothing, camping supplies, eye exams, veterinary exams for pets, and legal services. These gatherings are an excellent tool to connect with hard to reach populations, and start developing relationships.

Continuums of Care, CAAs, and service agencies across Oregon use a Coordinated Entry process to maximize and control applicant intake. Coordinated Entry systems allow the provider to assess a person's needs using a centralized database, ensuring that each person receives a thorough, expedited assessment along with a coordinated approach to services. Use of standard assessment tools can help to align appropriate services with resources to fit personal

needs. Through a network of case management, community based support systems, financial and rent assistance and self-sufficiency opportunities, homeless and at-risk households are linked to services designed to help them obtain or retain housing stability.

Addressing the emergency shelter and transitional housing needs of homeless persons

OHCS has funded two comprehensive studies regarding the state's housing needs and shelter inventory. Both studies state Oregon has an immediate need for additional shelters and increased capacity of communities to respond to the needs of their households experiencing homelessness. In the winter of 2019, OHCS granted state funds to agencies who would maximize winter shelter opportunities in their communities. OHCS made more funds available as winter rolled over into 2020. OHCS will continue to commit state and federal funds to fill gaps in shelter, transitional housing, permanent affordable housing, and other resources needed to answer the state's homelessness crisis.

Helping homeless persons (especially chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth) make the transition to permanent housing and independent living, including shortening the period of time that individuals and families experience homelessness, facilitating access for homeless individuals and families to affordable housing units, and preventing individuals and families who were recently homeless from becoming homeless again

Oregon's Community Action Agencies (CAAs) provide comprehensive services and support for households transitioning from homelessness to being housed. The Emergency Solution Grant Program (ESG), in combination with other resources, provides assistance to extremely low income households so they may secure, maintain, and retain housing.

Coordinated Entry systems optimize CAA efforts to coordinate with area nonprofit providers, and state and local governments, promoting effective use, and access, to mainstream programs and self-sufficiency services aimed at ending homelessness. Through a network of services that include case management, community based support systems, financial assistance, and personal budgeting, people experiencing or at risk of homelessness are linked to services designed to assist households reach and maintain housing stability. When entering shelter, an individual is assessed and provided essential services based on their needs and the services available. Services may include referral for mental health care, life skills supports, personal budgeting and finance, conflict resolution, and other needed skills that help reduce barriers and retain housing stability. Oregon Housing and Community Services (OHCS) promotes the use of a Housing First approach and will encourage subgrantees to use this model instead of shelter whenever possible. The approach is designed to serve the basic needs of the person before addressing or working to resolve identified barriers to housing. Shelter and housing providers

can inadvertently institute barriers that keep homeless or extremely low income households from being eligible for assistance. OHCS continues to work with subgrantees through workshops and other communication so subgrantees have the tools to identify and remove barriers in shelters and housing.

Multiple efforts are being made to encourage landlords to rent to those who are homeless. Oregon Housing and Community Services manages two landlord guarantee programs for reimbursement of unit damage and loss of rent. One program is designed to encourage landlords to rent to tenants in HUD's Housing Choice Voucher Program. The other program provides landlords with assurances for recourse if they rent to a high-risk tenant.

Many subgrantees have hired a dedicated staff position to concentrate on identifying and securing housing units for their program participants. These housing navigators market rent-assistance programs to landlords, keep abreast of housing opportunities in their service communities, and assist their agency's clients in their housing search.

Helping low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families and those who are: being discharged from publicly funded institutions and systems of care (such as health care facilities, mental health facilities, foster care and other youth facilities, and corrections programs and institutions); or, receiving assistance from public or private agencies that address housing, health, social services, employment, education, or youth needs

OHCS delivers rental assistance services through a statewide network of Community Action Agencies (CAAs), which is also the statewide system for delivery of anti-poverty services, including the Community Services Block Grant (CSBG). Community Action Agencies are able to align their poverty and homelessness resources to prevent homelessness and provide connections to supportive mainstream and community resources (i.e. employment services, child welfare assistance, TANF programs, etc.). OHCS encourages CAAs to work closely with community coordinated care organizations, culturally responsive organizations, governmental entities, nonprofits, mental and physical health providers, schools, public safety providers and others to design, implement, and deliver programs and services as partners in service to the most vulnerable Oregonians.

AP-70 HOPWA Goals – 91.320(k)(4)

One Year HOPWA Goals

Short-term rent, mortgage, and utility assistance to prevent homelessness of the individual or family	0
Tenant-based rental assistance	60
Units provided in permanent housing facilities developed, leased, or operated with HOPWA funds	0
Units provided in transitional short-term housing facilities developed, leased, or operated with HOPWA funds	0
Total	60 (unduplicated) or 68 (duplicated)

AP-75 Barriers to affordable housing – 91.320(i)

Introduction:

Actions it planned to remove or ameliorate the negative effects of public policies that serve as barriers to affordable housing such as land use controls, tax policies affecting land, zoning ordinances, building codes, fees and charges, growth limitations, and policies affecting the return on residential investment

An updated [Analysis of Impediments](#) conducted to support this plan found no significant barriers at the state level related to land use controls, tax policies, zoning ordinances, building codes, fees and charges, growth limitations, and policies.

The barriers that were found included:

Rental housing impediments are found in the shortage of rental housing across the state, challenges with source of income protections, and limited options for certain “high barrier” prospective tenants—persons with serious and persistent mental illness, persons with substance use disorders, persons with criminal histories, and undocumented residents—and lack of affordable, accessible housing for persons with disabilities.

There are significant differences in homeownership rates by race and ethnicity statewide and among counties. Black and African American homeownership is 30 percentage points lower and Hispanic homeownership rates are 20 percentage points lower than non-Hispanic White homeownership rates statewide.

Impediments to economic opportunity include disparities in access to quality learning environments, lack of access to state entrepreneurial program resources, and state agency challenges in compliance with federal Americans with Disabilities Act (ADA) and the *Olmstead* integration regulations.

Discrimination on the basis of protected class status, whether race, national origin, disability, or familial status, continues to occur in Oregon.

AP-85 Other Actions – 91.320(j)

Introduction:

This section describes the actions, and strategies, Oregon plans to take during the current Five-year Consolidated Plan period to foster and maintain affordable housing, evaluate and reduce lead-based paint hazards, reduce the number of poverty-level families, develop institutional structure, and enhance coordination between public and private housing and social service agencies.

Actions planned to address obstacles to meeting underserved needs

The 2021-2025 Consolidated Plan includes an Analysis of Impediments document covering the same period. This robust document outlines the various barriers the state continues to face as it continues to try and address underserved needs. The Analysis of Impediments document includes an action plan section which the state will use as a roadmap over the next five years to address underserved needs.

Actions planned to foster and maintain affordable housing

Research and outreach efforts show a considerable shortage of affordable housing in Oregon. Each year tax credits and rent subsidy contracts expire, jeopardizing Oregon's affordable housing stock, and risking a loss of units to the open market. Preserving decent housing, improving sustainability and affordability, and rehabilitation of units, are strategies Oregon will use to retain existing affordable housing. This task is becoming increasingly difficult as federal funds decrease or remain stagnant while construction cost rise.

OHCS's Home Ownership Assistance Program (HOAP) includes a First-time Homebuyer Program, and provides education and down payment assistance, a lender toolkit and resources, foreclosure prevention counselors and resources, and energy bill payment and weatherization assistance.

OHCS administers the HOME program for the balance of state, and the HTF program for the State of Oregon. HOME funds used for multifamily development are generally allocated through an annual competitive Notices of Funding Availability (NOFA) in conjunction with other available state resources, and are also allocated for rental assistance administered by Community Action Agencies.. Oregon has adopted a 60 year affordability standard, extending well beyond the required period of affordability. It is very difficult to serve extremely low income persons with the limited amount of funding available.

OHCS provides federal and state tax credits and other available gap financing to affordable housing developers. OHCS administers the federal LIHTC program, a major funding source for

development of affordable housing. Tax credits are leveraged with other state and federal funds through a competitive NOFA process, allowing one application for all resources available through the NOFA. The nine percent LIHTC NOFA includes other state resources such as the Oregon Affordable Housing Tax Credit, Low Income Weatherization funds, and a portion of the HOME funds in the balance of state. OHCS also administers the non-competitive four percent tax credits used in conjunction with tax-exempt bonds.

Actions Planned to Reduce Lead Based Paint Hazards

OHCS strategies to address lead based paint (LBP) hazards and increase access to housing without LBP hazards include:

- Inspection of OHCS funded properties for LBP hazards
- Implementation of monitoring, or informing property owners of monitoring requirements; and
- LBP education and training for staff and partners

OHCS' portfolio does not currently include any projects with hazards of lead poisoning, however properties constructed prior to 1978 may be subject to requirements for assessment, evaluation, and mitigation of LBP, per federal regulation 24 CFR Part 35. OHCS compliance officers determine if monitoring for LBP is required and, if necessary, implement, or advise property owners of monitoring requirements.

The ESG and HOME TBRA programs require a visual assessment for LBP hazards as part of the housing standards inspection prior to rental of units built prior to 1978, and the household includes a child under age six.

OBDD-IFA developed procedures to eliminate the hazards of lead poisoning due to the presence of LBP in housing assisted with Community Development Block Grant funds. In accordance with the Lead Based Paint Hazard Reduction Act of 1992 (Title X) the state established a certification program for inspectors and contractors and accrediting programs for trainers.

All purchasers and tenants of CDBG assisted emergency homeless shelters, transitional housing and domestic violence shelters constructed prior to 1978 receive a notice about the potential hazards of LBP. Grant recipients must keep documentation of the notifications in their local project file.

In addition, department staff has opportunities to continue LBP education by attending HUD

sponsored trainings on healthy homes, LBP rules, repairs, and technical assistance.

Actions planned to reduce the number of poverty-level families

OHCS will continue to address poverty and reduce the number of poverty level families through the use of affordable housing opportunities and by attaching supportive services many of the housing opportunities financed by the State of Oregon. In addition, OHCS offers a number of other opportunities to help reduce poverty including but not limited to the Individual Development Account Program, down payment assistance program providing families the opportunity to wealth build through homeownership and through support of educational and training programs designed to help families achieve self-sufficiency.

Actions planned to develop institutional structure

Oregon's institutional delivery structure system's strengths are through collaboration and coordination with our partners. Following are some of the ways Oregon and our partners are working to enhance coordination and implementation of the Consolidated Plan:

- Ongoing implementation of the coordinated entry system. The standard assessment tool identifies need, eligibility, support, and availability of services, allowing acceleration of assessment and placement.
- Working with CAAs and CoCs to develop partnerships with culturally specific and culturally supportive organizations to increase access to housing and services in communities of color.
- Continued support of the PSH Institute to build a robust pipeline of PSH projects, including projects developed by partners located in rural Oregon.
- Every five year a Statewide Coordinated Statement of Need (SCSN) and Comprehensive Plan are submitted to the United States Department of Health and Human Services, HIV/AIDS Bureau. The SCSN planning process provides a collaborative mechanism to identify and address significant care and treatment issues related to the needs of people living with HIV/AIDS, and to maximize coordination, integration, and effective linkages across all Ryan White Program sections.
- Technical assistance to help cities and counties navigate the CDBG program requirements are provided by Business Oregon.

Actions planned to enhance coordination between public and private housing and social service agencies

OHCS delivers rental assistance services through a statewide network of CAAs, which is also the statewide system for delivery of anti-poverty services, including the Community Services Block Grant (CSBG). CAAs work extensively with governmental entities, nonprofits, mental and

physical health providers, schools, public safety providers, and others to design, implement, and deliver programs and services to low-income individuals and families.

Community Action Agencies provide information and referrals to the public and are key participants in their respective Continuums of Care, which enables them to be a community hub for linking low-income people to mainstream supportive services. CAAs maintain partnerships with systems of care to ensure coordination, and to avoid duplication of services.

The Department of Human Services (DHS) uses TANF funds to address crisis and short-term needs that put low-income families with children at risk of becoming homeless. OHCS partners with DHS in this effort, and works to strengthen and expand this program as well as replicate similar partnerships with other state departments.

Oregon Continuums of Care are implementing coordinated entry process. The tool works to access both visible and hidden barriers. Reaching across disciplines increases the possibility of touching upon a cross section of life skills support, substance and or alcohol abuse treatment, anger management, counseling, and other areas that may help a person maintain housing stability. OHCS is becoming the statewide HMIS lead.

In 2015, the Oregon Legislature approved an expansion of the Housing Council to become the Oregon Housing Stability Council and include additional members to enhance coordination between public and private housing and social service agencies. The Housing Stability Council and the Community Action Partnership of Oregon are key networks that work to ensure a statewide continuum of housing and services for low income households, people experiencing homelessness, and special needs populations.

Program Specific Requirements

AP-90 Program Specific Requirements – 91.320(k)(1,2,3)

Introduction:

The following section addresses program-specific requirements for the CDBG, HOME, ESG, HTF and HOPWA programs included in the Annual Action Plan.

Community Development Block Grant Program (CDBG)

Reference 24 CFR 91.320(k)(1)

Projects planned with all CDBG funds expected to be available during the year are identified in the Projects Table. The following identifies program income that is available for use that is included in projects to be carried out.

There is no program income expected for the CDBG program before the start of the program year, nor the remaining items identified under point 2-5 in the table “Use of CDBG Funds”.

The estimated percentage for number 2, “Other CDBG requirements” is calculated for a consecutive period of three years (2019-2021).

Urgent need amount is currently unknown as CDBG funds, and at any time during the program year may be utilized to provide grants to eligible applicants for projects arising from bona fide emergencies.

1. The total amount of program income that will have been received before the start of the next program year and that has not yet been reprogrammed	0
2. The amount of proceeds from section 108 loan guarantees that will be used during the year to address the priority needs and specific objectives identified in the grantee's strategic plan	0
3. The amount of surplus funds from urban renewal settlements	0
4. The amount of any grant funds returned to the line of credit for which the planned use has not been included in a prior statement or plan.	0
5. The amount of income from float-funded activities	0
Total Program Income	0

Other CDBG Requirements

1. The amount of urgent need activities	0
2. The estimated percentage of CDBG funds that will be used for activities that benefit persons of low and moderate income. Overall Benefit - A consecutive period of one, two or three years may be used to determine that a minimum overall benefit of 70 percent of CDBG funds is used to benefit persons of low and moderate income. Specify the years covered that include this Annual Action Plan.	90% (2019-2021)

**HOME Investment Partnership Program (HOME)
Reference 24 CFR 91.320(k)(2)**

A description of other forms of investment being used beyond those identified in Section 92.205 is as follows:

OHCS does not offer any other form of investment beyond those identified in 24 CFR 92.205 for the HOME program.

The state does not plan in advance to limit or give preference to special needs populations in HOME funded projects, but will consider proposals made by developers when applications are received in response to the annual NOFAs. Projects serving special needs populations may receive HOME funding if it is determined that there is a great need for affordable housing for that specific population in the community where the proposed project will be located, OR if other funding in the proposed project requires a specific special needs population be given a preference. For example, if the project receives funding to serve Veterans, OHCS will allow Veterans to be given a preference, but we don't know this in advance of the NOFA.

1. A description of the guidelines that will be used for resale or recapture of HOME funds when used for homebuyer activities as required in 92.254, is as follows:

OHCS does not operate a HOME funded homebuyer program.

2. A description of the guidelines for resale or recapture that ensures the affordability of units acquired with HOME funds? See 24 CFR 92.254(a)(4) are as follows:

OHCS does not operate a HOME funded homebuyer program.

3. Plans for using HOME funds to refinance existing debt secured by multifamily housing that is rehabilitated with HOME funds along with a description of the refinancing guidelines required that will be used under 24 CFR 92.206(b), are as follows:

OHCS does not use HOME funding to refinance existing debt.

**Emergency Solutions Grant (ESG)
Reference 91.320(k)(3)**

1. Include written standards for providing ESG assistance (may include as attachment)

Subgrantees are required to comply with OHCS minimum standards, develop agency standards, or comply with standards set by their Continuum of Care (CoCs) for providing ESG funds.

Subgrantees must verify their compliance with OHCS minimum standards and/or submit their proposed standards for OHCS approval through the Master Grant Agreement (MGA) funding application process. Compliance with ESG standards is also included in OHCS monitoring of

subgrantees. OHCS minimum written standards are provided to grantees through the Emergency Solutions Grant Operations Manual. The standards may be found in [Emergency Solutions Grant Program Operations Manual](#). (July 1, 2020)

The ESG-CV funds allocated to OHCS also require written standards. These standards differ from the standards for the annual ESG allocation because HUD has allowed waivers and exceptions of some ESG requirements which conflict with the annual ESG written standards. Standards for ESG-CV have been drafted and are incorporated in the Action Plan as an attachment.

2. If the Continuum of Care has established centralized or coordinated assessment system that meets HUD requirements, describe that centralized or coordinated assessment system.

The following Coordinated Entry plans are in effect:

Balance of State (OR-505) – Rural Oregon Continuum of Care (ROCC)

The ROCC has identified one service agency in each of its 28 counties to be the primary access point for all persons seeking services. Each lead agency provides an in-person or telephone assessment and entry into the county’s Coordinated Entry system. Alternative methods of assessment are available through the use of outreach teams. Assessments include the completion of a standard base assessment and VI-SPDAT, with a separate standardized process for persons fleeing domestic violence. Each lead agency has established prioritization processes for each program the agency operates. Prioritization criteria ensures the most vulnerable, chronic, and homeless individual or household is receiving services first. Each partnering agency keeps a by-name list and follows a referral process.

Central Oregon (OR-503) – Homeless Leadership Coalition (HLC)

HLC’s Coordinated Entry process is a “multiple door” model. VI-SPDATs are completed for homeless households by trained assessors at all Central Oregon CES member agencies. CES staff meet monthly for case conferencing to identify participants who are highly vulnerable or have self-resolved or left the region. They review the list to see which agency the household is working with. If the household is not connected to an agency, the Housing Navigator at NEIGHBORIMPACT will add the household to his/her case load. All households receiving the Continuum’s funding are assisted through this process.

Clackamas County (OR-507)

Clackamas County's Coordinated Entry process – Clackamas County Coordinated Housing Access (CHA) – is a “multiple door” model; multiple partner agencies can assess a client for housing services. If people contact an agency directly, they will be assessed by that agency. Additionally, people needing assistance can call a central phone number that routes the caller to an agency on a rotational basis. All partnering agencies use the same process, tools, and criteria. A specialized process is used for persons fleeing domestic violence.

Jackson County (OR-502)

Jackson County's Coordinated Entry process is a “multiple door” model. Street Outreach Workers and Access Point Assessors, located at various agencies in Jackson County, complete a standard vulnerability assessment of the household's needs. The household information is added to the Continuum's Centralized Interest List (CIL). The HMIS/CE Coordinator at ACCESS refers CIL households to partner agencies according to the priority and type of needs of the household. The Continuum's prioritization policy is analyzed annually to make sure the coordinated entry system's people-centered approach continues to assist the most vulnerable households first.

Lane County (OR 500) – Lane County Poverty and Homeless Board

Lane County's Coordinated Entry process is a “multiple door” model. Front Door Assessors, located at various social service agencies, work with homeless households to complete a standard assessment that identifies the best type of services for the household. Front Door Assessors make a referral to the Central Waitlist (CWL). The referrals are reviewed by Lane County Human Services Division staff, and the households are prioritized by level of vulnerability and referred to housing programs as appropriate.

OR-504 -- Mid-Willamette Valley Homeless Alliance

This continuum of care was officially recognized by HUD in December 2019. The continuum serves Marion and Polk counties. They are working to develop their coordinated entry methodology. Until that is adopted, they are using the Coordinated Entry process implemented by the Rural Oregon Continuum of Care.

Multnomah County (OR-501)

Multnomah County's coordinated entry system is entitled “A Home for Everyone”. There are multiple local coordinated access points in place for each of four sub-populations of people experiencing homelessness: adults unaccompanied by minor children, families with minor

children, unaccompanied youth, and households fleeing domestic violence. There is also a process in place to rapidly connect Veterans experiencing homelessness to housing and support services through the Veteran By-Name List. Households may be eligible for resources through more than one of these processes. Multnomah County's web site lists available connection points for each sub-population, providing agency names and phone numbers to call.

Washington County (OR-506)

Information about contacting Washington County's Coordinated Entry process – Community Connect – is on Washington County's web site. For persons without access to the internet, outreach workers and community partners have cards to give out in both English and Spanish. The Household experiencing a housing crisis contacts Community Connect by phone. Basic information is taken during the telephone screening. Households are provided information and referral to community-based resources to help with basic needs, e.g. food, shelter, clothing. Households at risk or experiencing homelessness are scheduled for a 1-hour face-to-face appointment with a Community Resource Advocate (CRA). Focus is placed on referring households to the most appropriate housing and service program based on need. The service agency receiving the referral reviews the assessment scoring and final determination with the household to ensure the most appropriate program is being offered.

3. Identify the process for making sub-awards and describe how the ESG allocation available to private nonprofit organizations (including community and faith-based organizations).

The distribution of ESG program funds is completed through a Master Grant Agreement (MGA) funding application process between OHCS and its Community Action Network subgrantees. The MGA is the legal, contractual agreement utilized for disbursement of OHCS administered anti-poverty grant funds.

Oregon Housing and Community Services is legislatively required to utilize the Community Action Agency (CAA) network as its primary service delivery mechanism of ESG funds at the local level. The CAA network serves as the foundation of the OHCS homeless services delivery structure. The network coordinates with multiple local and statewide partners to establish linkages that maximize housing stabilization efforts and address the diverse needs of people experiencing or at risk of homelessness while avoiding duplication of services.

Sixteen designated community action nonprofit agencies and local government entities, and a statewide farmworker organization, submit biennial funding applications to OHCS for homeless funding including ESG. The applications include program implementation reports and budgets detailing the proposed targeting and utilization of the ESG funds. Applications are reviewed by program staff for organizational capacity, needs-based population targeting, utilization of the

funds, and feasible program strategies to meet federal and state delivery requirements and priorities. Additionally, each subgrantee’s knowledge of community needs, extent of engaged partners, historical delivery capacity and success are reviewed. ESG funds are allocated by a formula using three criteria; severe housing burden, poverty, and homelessness, and made available upon approval of each subgrantee’s application and execution of their MGA.

4. If the jurisdiction is unable to meet the homeless participation requirement in 24 CFR 576.405(a), the jurisdiction must specify its plan for reaching out to and consulting with homeless or formerly homeless individuals in considering policies and funding decisions regarding facilities and services funded under ESG.

As the state recipient, OHCS is not required to comply with the homeless participation requirement of 24 CFR 576.405(a).

5. Describe performance standards for evaluating ESG.

Oregon Housing and Community Services continues to refine data collection reporting requirements. In addition to obtaining household and demographic data, OHCS’s subgrantees are responsible to provide data for the following two performance standards in regard to their ESG services:

- Increased housing stability as measured by the percentage of total program participants who reside in permanent housing at the time of their exit from the program or project funded by ESG; and
- Increased housing stability as measured by the percentage of households experiencing homelessness that exited to permanent housing and retained that housing for six months or longer.

**Housing Trust Fund (HTF)
Reference 24 CFR 91.320(k)(5)**

1. How will the grantee distribute its HTF funds? Select all that apply:

Housing Trust Fund funds for multifamily rental housing development will be distributed annually to eligible recipients that submit applications in response to the OHCS Notice of Funding Availability (NOFA). Projects are selected based on criteria published in the NOFA, as well as the Low Income Housing Tax Credit (LIHTC) Qualified Allocation Plan (QAP) if applicable.

2. If distributing HTF funds through grants to subgrantees, describe the method for distributing HTF funds through grants to subgrantees and how those funds will be made

available to state agencies and/or units of general local government. If not distributing funds through grants to subgrantees, enter “N/A”.

N/A.

3. If distributing HTF funds by selecting applications submitted by eligible recipients,

a. Describe the eligibility requirements for recipients of HTF funds (as defined in 24 CFR § 93.2). If not distributing funds by selecting applications submitted by eligible recipients, enter “N/A”.

Eligible recipients are project sponsors, developers, for-profit entities, non-profit entities, and housing authorities. Faith-based organizations are eligible to participate in the HTF program. 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 HTF Recipient Must:

- Make acceptable assurances to OHCS 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.

b. Describe the grantee’s application requirements for eligible recipients to apply for HTF funds. If not distributing funds by selecting applications submitted by eligible recipients, enter “N/A”.

Housing Trust Fund funding is allocated through a competitive NOFA. Oregon Housing and Community Services may employ, but is not limited to, the following criteria upon which to base its funding decisions:

- Each Application will be reviewed for timeliness and completeness of the NOFA requirements.
- After passing Administrative Review, these Minimum Threshold Requirements must be met:

- Program Compliance
- Relocation Plan
- Ways and/or targets that they will utilize to contract with MWESB contractors/subcontractors in the construction and operation of the proposed Project.
- Application must demonstrate the Project’s readiness to proceed.

c. Describe the selection criteria that the grantee will use to select applications submitted by eligible recipients. If not distributing funds by selecting applications submitted by eligible recipients, enter “N/A”.

Housing Trust Fund 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. A total of 100 maximum points is possible, weighted twenty for need, forty for impact, ten for preferences, fifteen for financial viability, and fifteen for capacity. In the competitive NOFA process, OHCS awards additional points for applications that include the use of HUD 811 Rental Assistance. In addition, OHCS awards points for serving the lowest income population, which includes points for projects with Project Based Rental Assistance.

Project units that receive HTF funding must rent to tenants at or below 30% of the Area Median Income.

d. Describe the grantee’s required priority for funding based on geographic diversity (as defined by the grantee in the consolidated plan). If not distributing funds by selecting applications submitted by eligible recipients, enter “N/A”.

Oregon Housing and Community Services 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.

e. Describe the grantee’s required priority for funding based on the applicant's ability to obligate HTF funds and undertake eligible activities in a timely manner. If not distributing funds by selecting applications submitted by eligible recipients, enter “N/A”.

Readiness to Proceed

- Certification of zoning

- All Applications must include a zoning certification form, even if the Project is solely acquisition or rehabilitation. The Department will not accept application for Projects that require zone changes or annexations.
- The original of the Certificate must be placed in the original application.
- Verification of site control
 - Complete the table and attach evidence of site control. The General Policy and Guideline Manual contains a discussion of acceptable site control verification. If you do not yet own the property, be sure to submit all extension documents, amendments and/or addendums to your original documents.

Federal project resources status

- The Applicant should provide a copy of the U.S. Department of Housing and Urban Development (HUD), U.S. Department of Agriculture Rural Development (RD), or Veteran’s Administration (VA) application (not all the attached materials) along with a brief statement on the application status.

Proposed development schedule

- The Project schedule should be accurate and the timelines should be consistent with the requirements of the Project’s components, such as providing adequate time to complete acquisition or satisfaction of funding conditions.

Project Site Review checklist

- You must complete the Project Site Review Checklist. If an Application involves more than one (1) land parcel, complete a Review Checklist for each parcel.
- OHCS completes its competitive NOFA Process with a Reservation of Funding for those projects selected to proceed in the development process. Applicants are required to demonstrate the ability and financial capacity to undertake, comply, and manage the eligible activity;
- The following is an excerpt for the NOFA Reservation Letter stating the 240 day deadline to begin construction:
 - “The resources detailed above contain pre-funding conditions to be met prior to any grant or loan funding disbursements.
 - The conditions are a result of statutory requirements, federal regulations and/or OHCS criteria. Generally, the conditions are to be met 30 days prior to any resource funding. If there is concern that any of the conditions will not be met within this timeline, contact me to discuss a later agreed upon time.

- Applicant will execute any and all documents required by OHCS Policy and Program Requirements in form and content satisfactory to the Department in its sole discretion.
- Applicant is aware that the Department may enact a re-evaluation of the Reservation under the following circumstances: failure to reach construction closing within 240 days of the date of this letter; and material change that causes the project to not meet minimum qualifications.”

f. Describe the grantee’s required priority for funding based on the extent to which the rental project has Federal, State, or local project-based rental assistance so that rents are affordable to extremely low-income families. If not distributing funds by selecting applications submitted by eligible recipients, enter “N/A”.

In the competitive NOFA process, OHCS awards additional points (one to five) for applications that include the use of HUD 811 Rental Assistance. In addition, OHCS awards seven points for serving the lowest income population, which includes two points for projects with Project Based Rental Assistance.

g. Describe the grantee’s required priority for funding based on the financial feasibility of the project beyond the required 30-year period. If not distributing funds by selecting applications submitted by eligible recipients, enter “N/A”.

The 2021 HTF Allocation Plan discusses the Program Specific Requirements of the Housing Trust Fund as discussed below.

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.

Additionally, the following excerpt from the OHCS NOFA describes the requirements for financial feasibility of project seeking funding through OHCS, including HTF:

(D) Financial Viability: 15 points

1. Development pro forma review

- a. Pro forma includes only realistic and available resources on the Sources of Funding. Capital fundraising campaigns are not considered realistic and available

resources. Any inclusion of resources that are unrealistic or unavailable will result in a score of minus fifteen (-15) points in this category.

- b. Explanation of how the development budget will still be valid at the start of construction.
- c. Relocation Plan completed if warranted and aligns to development budget.
- a. Developer Fee is within the OHCS maximum allowable.
- b. If Uniform Relocation Act (URA), the budget line item accurately reflects the Project cost based on the sufficient Relocation Plan.
- c. If Commercial Real Estate is included in the Project, Sources and Uses are provided on a separate pro forma page.

2. Operating pro forma review

- a. Affordable rents at least ten percent (10%) below estimated market rents.
- b. Debt coverage ratio is a minimum of 1.15:1 for hard amortizing debt. When utilizing OAHTC funds, the minimum debt coverage ratio is required to be met after the OAHTC pass through is applied.
- c. Cash flow within OHCS guidelines or adequately explained (1.30 or below, unless adequately explained or declining cash flows require a higher debt coverage).
- d. Vacancy rate at seven percent (7%) or adequately explained if different.
- e. Submitted reserves for replacement analysis and included adequate amount for replacement items in pro forma as detailed in IV.E.ii Operating Pro forma of the QAP.
- f. Income inflation factor is less than expenses inflation factor.
- g. In a mixed use project, no commercial income may be used to support the low-income residential project

3. Reasonable request and demonstrated need for resources

- a. Eligible basis requested is analyzed to determine accuracy (land, commercial, ineligibles are not supporting annual allocation, and there will not be a material gap in finances).

4. Well documented and explained construction costs

- a. Construction documents, including CNA, if required, provide enough detail to adequately calculate Project hard costs.
- b. Construction and rehabilitation estimates substantially agree with the pro forma.
- c. Green building costs reflected in construction costs.
- d. Contractor overhead, profit and general conditions are within the required range for LIHTC as specified in IV.E Financial Feasibility section of the QAP.

h. Describe the grantee’s required priority for funding based on the merits of the application in meeting the priority housing needs of the grantee (such as housing that is accessible to transit or employment centers, housing that includes green building and sustainable development features, or housing that serves special needs populations). If not distributing funds by selecting applications submitted by eligible recipients, enter “N/A”.

The Scoring Criteria are designed to measure the severity of need and overall impact to the community as well as to prioritize those projects that best meet established preferences, demonstrate dynamic partnerships and outcome based service delivery, and who involve sponsors, owners, and management agents with demonstrated high levels of performance.

A total of 100 maximum points is possible, weighted 20 for need, 40 for impact, 10 for preferences, 15 for financial viability, and 15 for capacity.

Any Application that does not have the minimum overall score of 75 points will be disqualified, and the Application charge will not be refunded.

Both quantitative and qualitative factors are considered in the scoring. The criteria to be used, and the scoring group, for each scored section will be as follows:

(A) Need: 20 points

1. Target Population – 5 points
2. Severity of Need - 9 points max
3. Equitably Served Geography – 6 points

(B) Impact: 40 points

New Construction and Acquisition / Rehabilitation project Impact Criteria

1. Plan Alignment – 5 points
2. HOME Leverage– 2 points
3. HTF Leverage – 3 points
4. State initiative / policy alignment – 4 points
5. Resident Services – 5 points
6. Affirmative Fair Housing Marketing – 5 points
7. Location Efficiency – 8 points max

8. Location Preferences – 8 points max

i. Describe the grantee’s required priority for funding based on the extent to which the application makes use of non-federal funding sources. If not distributing funds by selecting applications submitted by eligible recipients, enter “N/A”.

OHCS prioritizes projects based on alignment with several elements that would tie directly to the commitment of local resources; notably these include alignment with local planning efforts and state initiatives. In the preference given to projects aligned with local plans, applicants are required to identify connections between local and regional efforts in order to demonstrate the importance of their project to local development and planning efforts; commitment of local resources is a clearly demonstrated tie that would establish importance of these local efforts and advantage a project through the selection process. A similar preference is given to those projects that demonstrate alignment with statewide policy initiatives, through significant ties including funding commitment of local partners working on such investments. Lastly, preference is given in project selection to those with committed partnerships for resident services; oftentimes these are built through a commitment of local resources to support the ongoing operations of robust resident service and outcome tracking measurements. All of these measures of leverage are part of larger assessments in order to not only preference those jurisdictions with large resources to commit to affordable housing, but instead to also preference those that are strategically working to address housing issues and committing limited resources to further those efforts.

4. Does the grantee’s application require the applicant to include a description of the eligible activities to be conducted with HTF funds? If not distributing funds by selecting applications submitted by eligible recipients, select “N/A”.

The OHCS NOFA application requires the subject project to be fully conceived. The application requirements include site control, preliminary design, and a financially feasible proforma with development and operating budgets. The type of project is identified and described (new construction, acquisition/rehabilitation, and acquisition rehabilitation with new construction). Target population to be housed, unit types, total number of each unit type, income and rent limitations of the proposed units, and square footage of units are all required in the application.

5. Does the grantee’s application require that each eligible recipient certify that housing units assisted with HTF funds will comply with HTF requirements? If not distributing funds by selecting applications submitted by eligible recipients, select “N/A”.

Housing Trust Fund 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. Housing Trust Fund requirements are included in the HTF Program Manual which accompanies the NOFA.

6. Performance Goals and Benchmarks. The grantee has met the requirement to provide for performance goals and benchmarks against which the grantee will measure its progress, consistent with the grantee’s goals established under 24 CFR 91.315(b)(2), by including HTF in its housing goals in the housing table on the SP-45 Goals and AP-20 Annual Goals and Objectives screens.

Yes.

7. Maximum Per-unit Development Subsidy Amount for Housing Assisted with HTF Funds. Enter or attach the grantee’s maximum per-unit development subsidy limits for housing assisted with HTF funds.

In order to contain costs, Oregon Housing and Community Services established the following cost-per-unit subsidy limits. The costs are based on the total development and construction costs (excludes acquisition). The limits are established using recently funded (five year) history of OHCS Projects and based on unit size.

2020 Oregon LIMIT cost/unit	Studio	1 Bedroom	2 Bedroom	3 Bedroom	4 Bedroom
Urban	\$231,000	\$281,000	\$330,000	\$374,000	\$394,000
Balance of State	\$182,000	\$220,000	\$270,000	\$308,000	\$341,000

Due to the fact that HTF would be allocated through the OHCS 9% LIHTC NOFA, and because HTF is a statewide program (not limited to Balance of State), OHCS elected to align the HTF subsidy limits with the “Total Development Cost-Per-Unit” limits used by LIHTC program projects (9%). In order to contain costs, Oregon Housing and Community Services established the following cost-per-unit subsidy limits. The costs are based on the total development and construction costs (excludes acquisition) for each project based on a cost per square foot calculation performed after excluding nonresidential square footage. The limits are established

using recently funded (five year) history of OHCS Projects, using final certified costs when available, and most recent projected costs if not.

Any project awarded both HTF and OHCS HOME is subject to the subsidy limits for both programs. The HUD Unit Allocation Workbook is used to calculate the numbers of assisted units for each program, utilizing the specific subsidy limits for that program and resulting in the number of designated units for each funding source. HUD's Cost Allocation Workbook calculates the actual cost of the HTF units based on square feet, and the maximum project subsidy based on the subsidy limits. The maximum HTF Investment cannot exceed the actual cost of the HTF units.

8. Rehabilitation Standards. The grantee must establish rehabilitation standards for all HTF-assisted housing rehabilitation activities that set forth the requirements that the housing must meet upon project completion. The grantee's description of its standards must be in sufficient detail to determine the required rehabilitation work including methods and materials. The standards may refer to applicable codes or they may establish requirements that exceed the minimum requirements of the codes. The grantee must attach its rehabilitation standards below.

Housing Trust Fund assisted housing is required to meet OHCS design and construction standards as defined in the [OHCS Core Development Manual](#) located on the OHCS website under Related Links.

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 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 must meet the HTF Program Property Standards.

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).

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.

9. Resale or Recapture Guidelines. Below, the grantee must enter (or attach) a description of the guidelines that will be used for resale or recapture of HTF funds when used to assist first-time homebuyers. If the grantee will not use HTF funds to assist first-time homebuyers, enter "N/A".

N/A.

10. HTF Affordable Homeownership Limits. If the grantee intends to use HTF funds for homebuyer assistance and does not use the HTF affordable homeownership limits for the area provided by HUD, it must determine 95 percent of the median area purchase price and set forth the information in accordance with §93.305. If the grantee will not use HTF funds to assist first-time homebuyers, enter "N/A".

The grantee has determined its own affordable homeownership limits using the methodology described in § 93.305(a)(2) and the limits are attached.

11. Grantee Limited Beneficiaries or Preferences. Describe how the grantee will limit the beneficiaries or give preferences to a particular segment of the extremely low- or very low-income population to serve unmet needs identified in its consolidated plan or annual action plan. If the grantee will not limit the beneficiaries or give preferences to a particular segment of the extremely low- or very low-income population, enter “N/A.”

Any limitation or preference must not violate nondiscrimination requirements in § 93.350, and the grantee must not limit or give preferences to students. The grantee may permit rental housing owners to limit tenants or give a preference in accordance with § 93.303(d)(3) only if such limitation or preference is described in the action plan.

The state does not place limitations or preferences for the populations the subgrantees can serve, other than the program’s household income restriction. Each subgrantee may determine their target populations or those segments of the population in the subgrantee’s service area that will receive priority or preference. Subgrantees must describe in their Master Grant Agreement Work Plans why, and with what input, they chose to give those populations preference or priority.

OHCS requires the subgrantees make their determinations with input from their community needs assessment, any local governmental focuses, and the types of housing resources available in their communities.

12. Refinancing of Existing Debt. Enter or attach the grantee’s refinancing guidelines below. The guidelines describe the conditions under which the grantee will refinance existing debt. The grantee’s refinancing guidelines must, at minimum, demonstrate that rehabilitation is the primary eligible activity and ensure that this requirement is met by establishing a minimum level of rehabilitation per unit or a required ratio between rehabilitation and refinancing. If the grantee will not refinance existing debt, enter “N/A.”

Requests for funds to buy-down or refinance current debt are not eligible for OHCS HTF funding.

Housing Opportunities for People with HIV/AIDS (HOPWA)

The following has been added to this section for the HOPWA Program per HUD guidance:

- Does the action plan identify the method for selecting project sponsors, including providing full access to grassroots faith-based and other community organizations?
- Oregon Health Authority is the grantee for HOPWA formula funding and directly carries out program implementation. OHA does not administer the program through project sponsors.

Appendix - Alternate/Local Data Sources

APPENDIX A.

COMMUNITY PARTICIPATION

APPENDIX A.

Community Participation

This Appendix details findings from the community engagement process conducted on behalf of the Oregon Business Development Department (“Business Oregon”), Oregon Housing and Community Services (OHCS), and Oregon Health Authority (OHA) to inform development of the State of Oregon’s 2021-2025 Five-year Consolidated Plan (Consolidated Plan) and 2021 Analysis of Impediments to Fair Housing Choice (AI).

Primary Findings

Primary findings from community engagement focus on housing, homelessness, and community development needs, priorities, and outcomes.

Housing needs, priorities, and outcomes—

- Consistent with findings from the Statewide Housing Plan, **there is a critical need to increase the supply of housing statewide, and especially the supply of housing that is affordable to low and moderate income households.**
- Housing in substandard condition continues to be a challenge, and stakeholder roundtable participants emphasized that much of the naturally occurring affordable housing (NOAH) in their region is in **poor condition**. Resources dedicated to housing rehabilitation are oversubscribed.
- **Supportive services**, especially those addressing mental health and substance use disorders (SUDS) are essential to helping many vulnerable residents remain housed. Current resources are described as insufficient and are not available in many rural communities. Stakeholders identify building capacity in rural Oregon to support housing stability of residents transitioning out of homelessness and for those with mental illness or substance use disorders as a priority to reduce homelessness and prevent returns to homelessness.
- Persons with criminal histories, persons with serious and persistent mental illness (SPMI), those who are currently precariously housed, persons with substance use disorders are considered to have **disproportionate housing needs** by at least half of stakeholder survey respondents. Two in five stakeholders identify residents with a prior eviction, persons with cognitive disabilities, persons with physical disabilities, residents of Hispanic descent, immigrants lacking documentation, and seniors as having disproportionately high housing needs.

- **Source of income protections are not effective** in the balance of state, as the likelihood of enforcement and fines are too low to change landlord behavior. The state-administered insurance fund available to housing providers whose property is damaged by tenants covered by source of income protections is not considered an effective and efficient remedy. The program is seen as administratively cumbersome, requires landlords to go through court processes, and is capped at an amount too low to justify the time and effort necessary to obtain relief funds.
- The housing activities stakeholders prioritized to address the **most urgent housing needs** in their region are:
 - More rental units for extremely low income households;
 - Emergency shelters for people who are homeless;
 - More rental housing for very low income households;
 - Transitional housing for people moving out of homelessness; and
 - Affordable and accessible housing for people with disabilities.
- **Among persons experiencing homelessness**, stakeholders believe that those with mental health challenges, those who are chronically homeless, persons with substance use disorders, persons with criminal histories or felonies, and people in rural areas have the **greatest unmet housing or supportive service needs**.
- Oregonians considered by stakeholders to be **most at-risk of homelessness** are those with serious and persistent mental illness (SPMI), SUDS, history of justice involvement, those who are precariously housed, and persons with cognitive disabilities. Black and African Americans and persons of Hispanic descent are also considered to be at higher risk of homelessness.
- The housing and service activities stakeholders prioritize as having **the greatest impact on homelessness** in Oregon, included:
 - Permanently Supportive Housing (PSH);
 - Additional affordable housing;
 - Emergency shelter beds;
 - Emergency rent assistance; and
 - Housing assistance/vouchers.
- With respect to **housing outcomes** from investment of CDBG, HOME, HTF, ESG and other public and private resources, in a survey to support the Consolidated Plan development, stakeholders prioritized:

- #1—Larger supply of affordable rental housing
- #2—Expanded beds/shelters to assist persons who are homeless
- #3—Larger supply of rental subsidies/housing choice rental vouchers
- #4—More equitable dispersion of HUD resources for populations historically underserved (i.e., within communities of color)
- #5—More equitable geographic dispersion of HUD housing resources

Community development priorities and outcomes—

- When stakeholders ranked the **most urgent unmet community development needs**, they assigned the highest priority to:
 - Infrastructure for Internet access to a community or parts of a community;
 - Water and sewer infrastructure;
 - Community facilities/capacity for mental health services;
 - Downtown/Main Street revitalization; and
 - Infrastructure for Internet access to connect existing fiber/cable to homes or buildings.

- The five **community development outcomes** from investment of CDBG and other public and private resources considered a priority by the greatest proportion of stakeholders in the survey are:
 - #1—Higher quality and affordable childcare centers;
 - #2—Digital/broadband available to residents regardless of their geographic location;
 - #3—Economic growth/positive economic impact;
 - #4—Increase in local jobs; and
 - #5—Increase in local businesses.

COVID and wildfire impacts—

The COVID-19 pandemic exposed significant gaps in access in rural Oregon: precarious financial situations of small business; shortage of childcare providers; gaps in Internet access for employment and education. These impacts, plus a lack of facilities to provide in-person services—previously delivered in shared buildings—and increased need for mental health facilities and services are among the many examples of changes in needs raised by stakeholders as a result of the COVID crisis and made more critical by wildfires. Nearly 60 percent of stakeholders believe homelessness in their service area has increased due to COVID and the wildfires.

Community Engagement Elements

The Root team is grateful to the residents and stakeholders who shared their experiences and perspectives on the most pressing housing, community development, economic development, and fair housing needs across Oregon. The community engagement process included:

- A stakeholder survey **focused on economic and community development** fielded with local and regional economic and community development experts, local elected officials, and city and county staff (Business Oregon Community Development Stakeholder Survey, 76 respondents);
- A separate stakeholder survey **focused on housing needs**, special needs populations, and fair housing with a diverse range of local experts in housing, human services, advocacy and more (OHCS Housing Stakeholder Survey, 109 respondents);
- Six regional roundtable discussions (conducted by zoom) with representatives of rural Oregon community and economic development organizations and human service agencies (26 participants);
- Focus groups and in-depth interviews with residents most likely to experience housing discrimination and economic insecurity (conducted by zoom and conference call):
 - Persons with disabilities and older adults;
 - Extremely and very low income residents;
 - Veterans who have experienced homelessness and their advocates;
 - Latino immigrants with limited English proficiency (conducted in Spanish);
- Focus groups with the education and enforcement staff of the Fair Housing Council of Oregon (FHCO) and a focus group with FHCO Community Advisory Group members from the Eastern, Southern, and Mid-Willamette Valley regions; and
- In-depth interviews with state and local experts on topics ranging from emergency management and disaster recovery to broadband access to advocacy and service provision to the state's immigrant communities and Latino community stakeholders in southern, central, and northeastern Oregon.

The Root team would like to thank all of the staff at OHCS, Business Oregon, the Oregon Disabilities Commission, Governor's Commission on Senior Services, Baker School District, Building Healthy Families, FHCO, Community Services Consortium, Community Action Team, CARE Inc, Clatsop Community Action, Lake County, Latino Community Association, Marta's House, Malheur County, Malheur ESD, Operation Rebuild Hope, Oregon Coalition Against Domestic and Sexual Violence, Peace at Home, Treasure Valley Women & Family

Medicine, and Umatilla Morrow Head Start who collaborated on the resident focus group hosting and recruiting or participated in stakeholder interviews.

Engagement timing—Wildfires and the COVID pandemic. In late summer and fall 2020 the COVID pandemic continued to impact daily life in Oregon and some of the most severe wildfires in the state’s history devastated much of rural Oregon. It was in this context that the community engagement occurred, providing an opportunity to understand acute needs caused or heightened by the fires and COVID as well as insights into longer term, more systemic housing, community, and economic development needs in the state.

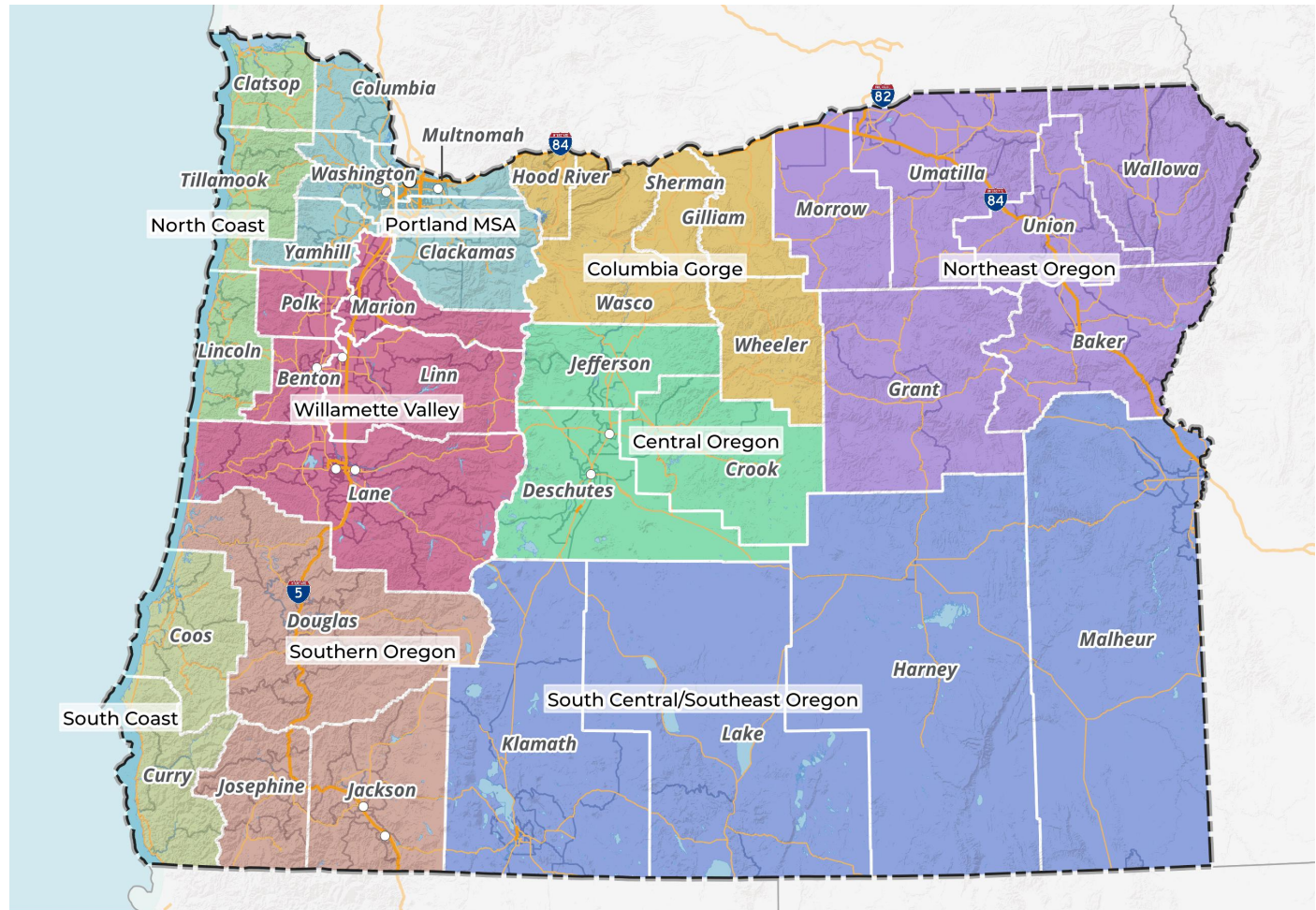
Regions. To facilitate analysis of regional differences, Business Oregon and OHCS chose to apply the nine regions used by the Oregon Office of Economic Analysis. These are:

- Central Oregon
- Columbia Gorge
- North Coast
- Northeast Oregon
- Portland MSA
- South Central/Southeast Oregon
- South Coast
- Southern Oregon
- Willamette Valley

The following map presents the location of the nine regions.

**Figure A-1.
Oregon Regions
and Constituent
Counties**

Source:
Oregon Office of Economic
Analysis.



Respondents to the Business Oregon and OHCS stakeholder surveys live and work throughout Oregon and represent local governments and organizations involved in housing, community and economic development in Oregon’s non-entitlement areas.

Figure A-2 shows the regions of Oregon served by participants in the Housing and Community Development stakeholder surveys. Each region of the state is represented as well as organizations with statewide operations.

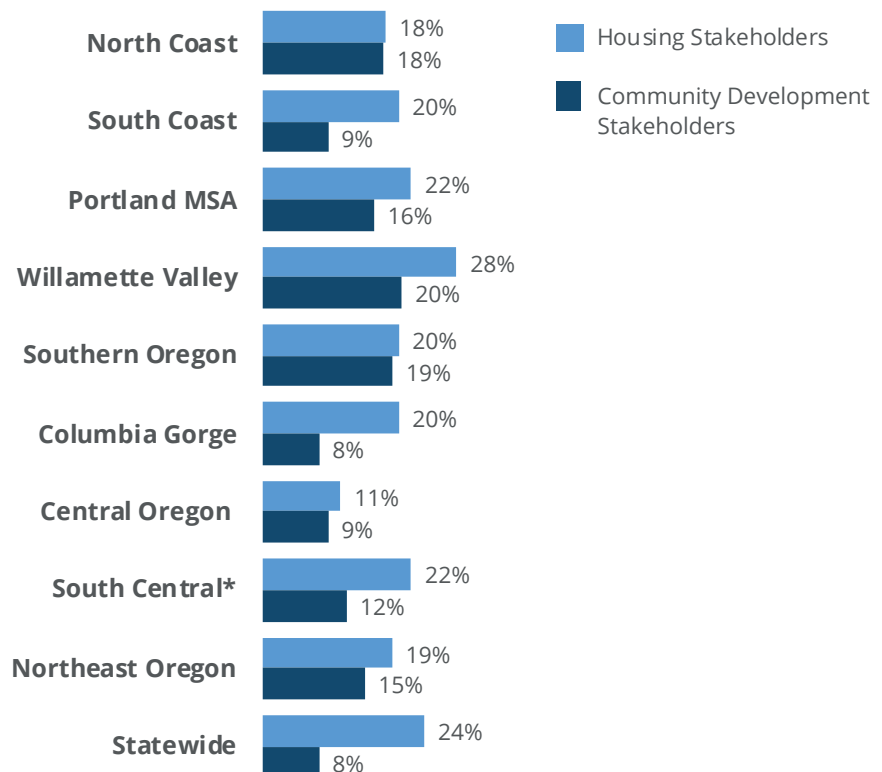
**Figure A-2.
Region(s) Served**

Note:

Numbers add to greater than 100 percent due to multiple response. n=106 housing stakeholders and n=74 community development stakeholders.

Source:

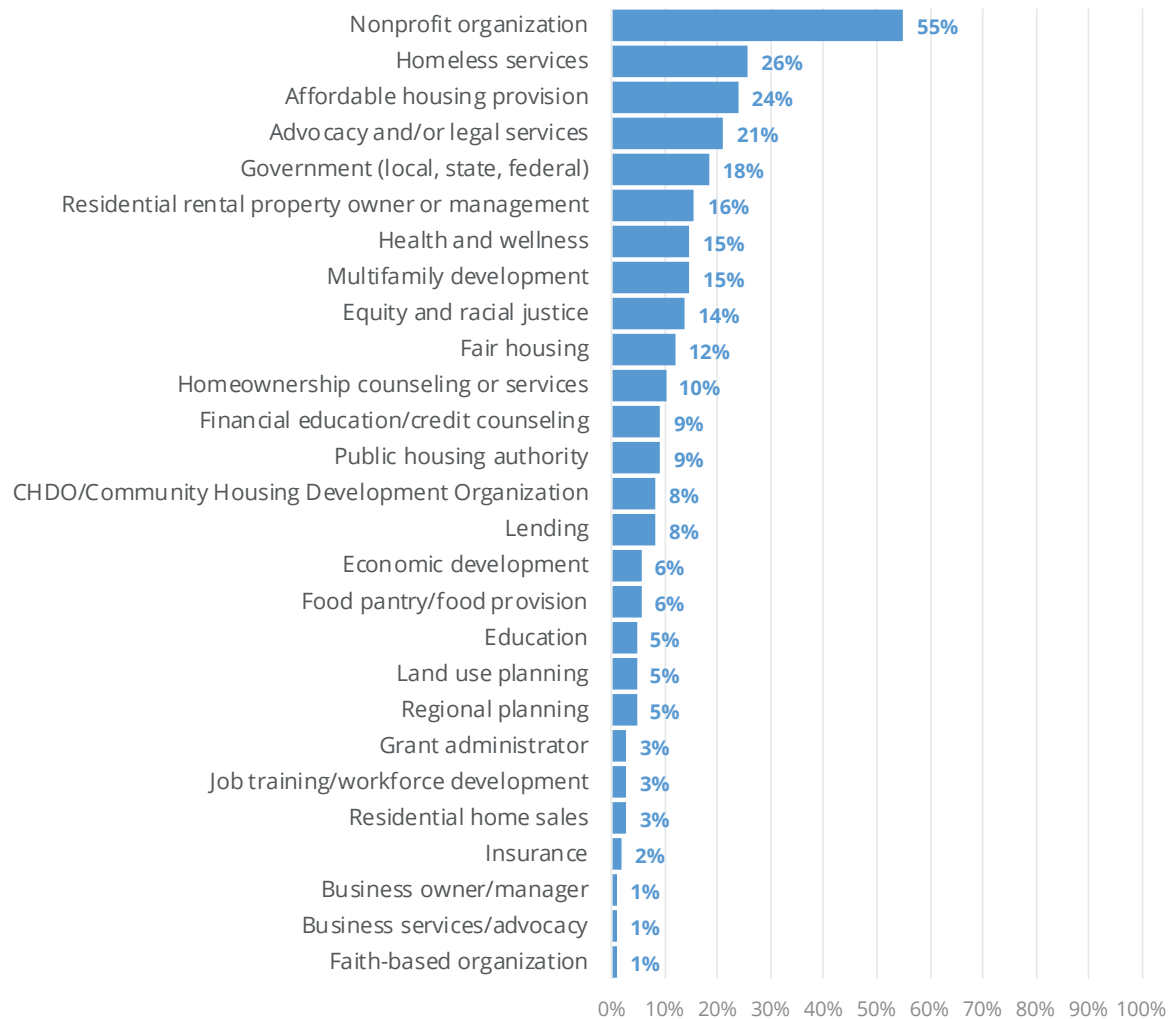
Root Policy Research from the 2020 OHCS Housing Stakeholder Survey and the 2020 Business Oregon Community Development Stakeholder Survey.



Profile of Housing Stakeholder Survey Participants

More than half of OHCS stakeholder survey participants work for nonprofit organizations. As shown in Figure A-3, the industry or organization type of these respondents is diverse and includes homeless services (26%), affordable housing (24%), advocacy and legal services (21%), government (18%), and rental property owners and managers (16%).

Figure A-3.
Type of Industry or Organization—Housing Stakeholder Survey

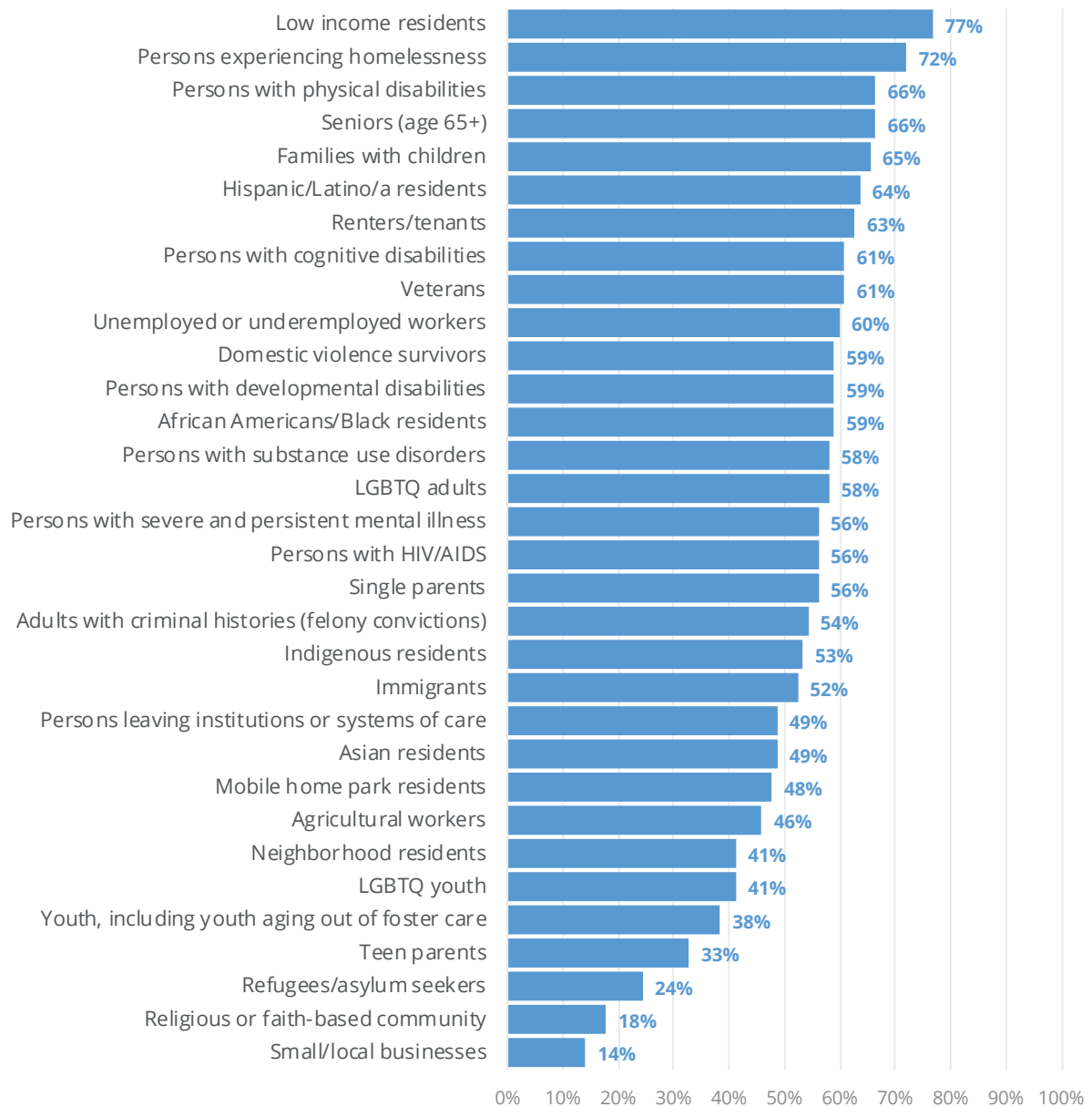


Note: n=109. Numbers add to greater than 100 percent due to multiple response.

Source: Root Policy Research from the 2020 OHCS Housing Stakeholder Survey.

Figure A-4 presents the different types of Oregon residents served by participants in the OHCS housing stakeholder survey. While nearly four out of five stakeholders serve low income residents, it is clear that participants in the OHCS Housing Stakeholder Survey serve or represent a diverse range of Oregon individuals and households, from those experiencing homelessness to people of color to persons with disabilities to the faith community and small/local businesses.

**Figure A-4.
Populations Served**



Note: n=109.

Source: Root Policy Research from the 2020 OHCS Housing Stakeholder Survey.

Housing Needs

OHCS Housing Stakeholder Survey respondents identified the housing activities they believe are needed to address the most urgent housing needs in the non-entitlement areas they serve. Similarly, participants considered the housing and services that would have the greatest positive impact on residents experiencing homelessness or who are at-risk of

homelessness. After identifying up to five housing activities or services, participants prioritized their selections in a ranking exercise.

Most urgent housing needs. Figure A-5 shows the number of respondents who selected each of 24 housing activities to meet urgent housing needs in their service area. As demonstrated in the figure, the activities selected by the greatest number of respondents are:

- Housing activities that result in more rental units for extremely low income households (<30% Area Median Income or AMI), very low income households (<60% AMI), and low to moderate income households (<80% AMI);
- Emergency shelters for people who are homeless and transitional housing for people moving out of homelessness;
- Repurposing vacant buildings for affordable housing; and
- Affordable and accessible housing for people with disabilities.

Figure A-5.
Among the following housing activities, where should housing funds be directed to meet urgent needs in your service area? (Select up to 5.)

Housing Activity	# of Responses
More rental units for extremely low income/poverty-level households (at 30% AMI)	61
More rental housing for very low income households (60% AMI or less)	61
Emergency shelters for people who are homeless	49
Transitional housing for people moving out of homelessness	46
More rental housing for low to moderate income households (80% AMI or less)	42
Repurpose vacant/underutilized properties into affordable housing	41
Affordable and accessible housing units for people with disabilities	40
Long-term tenant based rental assistance (6+ months)	38
Funds to pay rental debts accumulated from March 2020 to present (COVID-related)	28
More homes for low to moderate income households to buy (60%-120% AMI)	28
Services that help residents achieve or maintain housing stability (supportive services)	26
Navigators to help residents locate and qualify for affordable housing/housing assistance	24
Emergency assistance to pay utilities	18
Short-term tenant based rental assistance (3-6 months)	15
Preservation of affordable homeownership in manufactured home communities	15
Funds to pay mortgage debts accumulated from March 2020 to present (COVID-related)	14
Assistance to low income homeowners for accessibility modifications (ramps, grab bars)	14
Emergency assistance for vehicle repairs	11
Assistance for health and safety repairs for low and moderate income homeowners	11
Assistance to low income renters for accessibility modifications (ramps, grab bars)	10
Search engine/database to locate and qualify for affordable housing/housing assistance	10
Assistance for health and safety repairs for low and moderate income renters	6
Housing for area workforce	6
Lead-based paint abatement and control	2

Note: n=99.

Source: Root Policy Research from the 2020 OHCS Housing Stakeholder Survey.

In stakeholder roundtables, workforce housing and rental housing affordable to extremely low income and very low income households was consistently a top need discussed by participants.

- In the Columbia Gorge/Northeast Oregon stakeholder roundtable, top housing needs include workforce housing, including housing for seasonal workers, and addressing

substandard housing. These participants described a bar-bell shaped housing supply, with the greatest numbers of housing units concentrated on two extreme ends—housing affordable to low and moderate income households and housing affordable to high income households. The differences in type and quality are stark. Housing units affordable to low income households consist of mobile homes and older housing in very poor condition, much of it in floodplains. On the other end of the income spectrum housing products cater to retirees and tourists, ranging in price from \$300,000 to \$10 million homes. There is little middle income housing, and all new development is higher end.

- The Central/South Central and Southeast Oregon stakeholder roundtable participants described the need to increase the supply of housing available in the region affordable to all income levels. Blight and condition issues are a pressing problem in Lake County as is a lack of housing affordable to extremely low income households and housing for higher income households. In the last three years only five homes have been built in the county. In Klamath County lack of housing, particularly affordable housing is a significant challenge. Blight is a concern in Maude and Chiloquin.
- Participants in the North Coast region stakeholder roundtable identified increasing the supply of affordable rental housing, rental assistance and funding for owner-occupied home repair to address poor conditions as the greatest housing needs in the region. Participants shared that current programs to make condition improvements are vastly “oversubscribed” and more resources are needed. Stakeholders described a lack of workforce housing that is exacerbated by a lack of local capacity to develop housing. *“We are underproducing all types of housing. It is hard to get contractors to be willing to go to rural areas.”* Stakeholders shared that one in four households eligible for federal rental assistance receive assistance and that the gap is more pronounced at the lowest income levels.
- In the Willamette Valley region stakeholder roundtable, participants described the difficulty low and moderate income households experience trying to find housing they can afford. Many work in more affluent communities and must drive long distances to housing they can afford. In addition to a gap in housing affordable to very low income households, participants described a lack of affordable homeownership opportunities for first-time buyers. With deposit requirements, participants estimate that the average household must have \$3,000 available to secure an apartment to rent, resulting in more and more households doubling up, living in their vehicles, or camping. These participants prioritize diversifying the housing stock in the region, and reducing barriers to developing truly affordable housing for the Valley’s workforce. When new construction occurs, it is primarily designed to meet the needs of college students and is not suitable for families. Local businesses have difficulties recruiting employees due to housing issues.

- Southern Oregon stakeholder roundtable participants characterized housing needs in the region as “critical.” The combination of an aging population and aging housing stock leads to substandard housing conditions. The region’s housing market serves homeowners who can afford homes priced greater than \$300,000 well, but there is a significant lack of supply of rental and ownership opportunities available for all other household incomes. A lack of workforce housing hinders economic development as prospective employers are reticent to invest in communities that cannot meet employee’s housing needs. Participants would like to see state, CDBG, or other federal funds used for land acquisition and multifamily rental property rehabilitation in the Southern Oregon region.
- Participants in the South Coast roundtable discussion described the need to increase housing across the income spectrum as a pressing need. One of the biggest impediments to housing construction in this region is wetland mitigation requirements. For many communities, the only buildable land in the region has been deemed wetlands, and it is cost prohibitive for these small communities to participate in wetland banking or other offsets. A lack of contractors to build housing is an addition impediment the region must overcome to meet local housing needs.

In resident focus groups, participants shared similar stories of the difficulty they experienced trying to find affordable housing, and, in the case of participants with mobility disabilities, finding rental housing that is both affordable and accessible. Stories ranged from taking the only apartment available to rent in a county to searching more than 10 months for an affordable unit accessible to a woman in a wheelchair.

Supportive service needs. Those respondents who identified supportive services as an urgent activity needed to achieve or maintain housing stability described the types of services most needed. By far, stakeholders emphasized mental health services, alcohol and drug rehabilitation services, and behavioral health services—all necessary, in their view, to maintain housing. Supportive services not directly addressing serious and persistent mental illness (SPMI) or substance use disorders (SUDs) focused on life skills for very low income residents, such as budgeting, parenting skills, and navigating benefit programs; support gaining and maintaining employment; legal services; and childcare. Examples include:

- *“Access to services for individuals with SPMI and substance use disorder especially in support of tenancy.” (Stakeholder survey respondent)*
- *“Assistance with budgeting, life skills, maintaining a home, filling out applications, locating housing, understanding programs that help.” (Stakeholder survey respondent)*
- *“Employment, education, behavioral health, credit/debt counseling or forgiveness including fines, tickets, court, and legal fees.” (Stakeholder survey respondent)*

- *“I believe some supportive services already exist, (i.e. Centers for Independent Living help with locating resources, help contacting agencies, help completing applications) but there needs to be follow up services and supports to maintain stability and there needs to be funds to help with this process. But first there needs to be housing units available to rent.” (Stakeholder survey respondent)*
- *“Support obtaining ID, legal documents etc. and childcare.” (Stakeholder survey respondent)*

Farmworker housing needs. With respect to farmworker housing, several stakeholders commented on the need to help owners of farmworker housing make condition improvements. Others noted that those who leave employer-provided housing often have no rental or credit history in the U.S., making it difficult to rent or buy a home.

- *“Orchards are charging a fee to live in cabins and sometimes these cabins are in not in the best condition to live in. A lot of workers have no AC in the summer or heaters in the winter. Maybe addition support to orchardist to help make the cabins livable.” (Stakeholder survey respondent)*
- *“There is a need for farmworker housing and agriculture worker housing, including canning and packing house employees.” (Stakeholder survey respondent)*
- *“Farmworkers are seasonal usually, but about 30 percent of them stay and live in ag fam homes/cabins that need to made livable or at least better conditions. I hear so many heart breaking stories about workers suffering repercussions or afraid to speak up.” (Stakeholder survey respondent)*
- *“We are very rural in Baker County. It is mostly cattle ranching and farming. The employers provide the housing for their employees. The employees do not pay rent but housing is part of compensation while they work for them. They do have to pay their own utilities. If they leave their jobs at ranches and find work in town, they have to rent or own. No credit history. They have no rental history because have had homes through ranches.” (Latino community stakeholder interview participant)*

Priority housing activities to meet urgent needs. Once survey respondents identified their five housing activities to address the most urgent housing needs in their area, stakeholder prioritized the activities in a ranking exercise. As shown in Figure A-6, the five housing activities stakeholders ranked most highly to address their area’s most urgent housing needs are:

- More rental units for extremely low income households;
- Emergency shelters for people who are homeless;
- More rental housing for very low income households;

- Transitional housing for people moving out of homelessness; and
- Affordable and accessible housing for people with disabilities.

Figure A-6.
Highest Priority Housing Activities to Meet Urgent Needs (By Weighted Rank Score)

Housing Activity	Weighted Rank Score
More rental units for extremely low income households	168
Emergency shelters for people who are homeless	165
More rental housing for very low income households	148
Transitional housing for people moving out of homelessness	127
Affordable and accessible housing for people with disabilities	98
Repurpose vacant/underutilized properties into affordable housing	86
More low/mod rental housing	80
Long-term tenant based rental assistance (6+ months)	79
Homes for low/mod ownership	53
Pay COVID rent debts	51
Supportive services	43
Navigators to help locate and qualify for affordable housing/housing assistance	37
Short-term tenant based rental assistance (3-6 months)	27
Accessibility modifications for homeowners	22
Emergency utility assistance	19
Preservation of affordable homeownership in manufactured home communities	18
Pay COVID mortgage debts	16
Repairs for low/moderate income homeowners	15
Accessibility modifications for renters	11
Housing for area workforce	9
Emergency cash assistance for vehicle repairs	8
Search engine/database to locate and qualify for affordable housing/housing assistance	4
Repairs for low/mod renters	3
Lead-based paint abatement	0

Note: Higher Weighted Rank Scores indicate a greater number of respondents ranking an activity overall and ranking an activity highly. Weighted Rank Score = (number of #1 rank * 5) + (number of #2 rank * 4) + (number of #3 rank * 3) + (number of #4 rank * 2) + (number of #5 rank * 1). Highest possible score = 445.

Source: Root Policy Research from the 2020 OHCS Housing Stakeholder Survey.

Reasons for priority rankings. Stakeholders shared their reasoning for how they decided to rank the five activities they considered high priorities to address urgent local housing needs. Stakeholders balanced quick wins with longer term investments in local housing stock, and the extent to which their chosen priority activities work together to support a broader goal, such as long term housing stability for those who previously experienced homelessness or supporting the transition from renting to owning. Many sought to quickly fill local resource gaps, such as communities that offer no options for emergency shelter.

- *“I based my overall prioritization on those needs that do not currently have dedicated funding. 1) Oregon desperately needs more shelters, especially low barrier shelters across the state to address our high rates of unsheltered homelessness. Too many communities rely on volunteers and donated shelter space, which has fallen through during the pandemic. 2) While we have programs/funding for electric and heat assistance we also have a need for water/sewer utility assistance, and no current programs for this. 3) Rent assistance and the growing rental debts from COVID are also huge needs; I ranked them lower because I feel like the state has been funding these through other resources, however more is needed of course.” (Stakeholder survey respondent)*
- *“There is a critical lack of units for low income renters. No amount of supportive services can compensate. We need more construction of both supportive housing units and family homes and apartments. Rental subsidies are helpful for people at risk of homelessness, but only if they are ongoing.” (Stakeholder survey respondent)*
- *“Because we don't have any 24/7 emergency shelters in either county except during winter but even then, it's only for the nighttime. Also, we don't really have transitional services to help clients adjust to becoming renters except for coordinators who may not have experienced homelessness or understand how to best support them.” (Stakeholder survey respondent)*
- *“Chronic lack of affordable housing only exacerbates all other issues. Need different models for transitional housing—not all homeless are ready for Permanent Supportive Housing. Lack of shelters means we have a hard time serving homeless populations.” (Stakeholder survey respondent)*
- *“Financial constraints are the biggest impediment to renters finding quality housing that is sanitary/healthy, safe, affordable, secure and stable. In our estimation, adequate rental housing allows renters at the 60%-120% income range to contemplate home ownership.” (Stakeholder survey respondent)*
- *“For purposes of racial justice there needs to be more homes to purchase; to provide a continuum of housing types that will free up rental housing as homeownership increases among those able to purchase.” (Stakeholder survey respondent)*

- *“Majority of service area is below 80% AMI and workforce housing is needed at lower end of scale due to the number of units needed for service industry workers and people who make under median annual salary for area.” (Stakeholder survey respondent)*

Transitional housing needs. In focus groups, some stakeholders and residents described a need for some transitional housing to be included in their community’s housing spectrum. In particular, some form of transitional housing option was suggested for residents with mental illness, residents leaving treatment programs for SUDs or who are otherwise in early sobriety, and for some veterans transitioning out of homelessness. In particular, participants identified a gap in housing type for residents who may need shorter term temporary (transitional) supported housing before being successful living independently, but do not require the intensive service levels of permanent supportive housing.

- *“We need some kind of setup for transitional housing for mental health—for when they go into a breakdown, the family would lose everything. When my mom would get out of the hospital, she was placed into foster living, which was really good until she was ready to transition into her own independent room, and then transition into her own apartment. I don’t think that’s available now. It’s really challenging because we don’t have the support system within mental health, someone to check in can recognize signs of spiraling. They could get help then, so they wouldn’t continue to go through the cycle of losing everything.” (Community Advisory Group focus group participant)*

Populations with disproportionately high housing needs. Figure A-7 depicts the populations stakeholders believe have disproportionately high housing needs relative to all low and moderate income populations. Those with criminal histories, persons with serious and persistent mental illness (SPMI), those who are currently precariously housed, persons with substance use disorders are considered to have disproportionate housing needs by at least half of respondents.

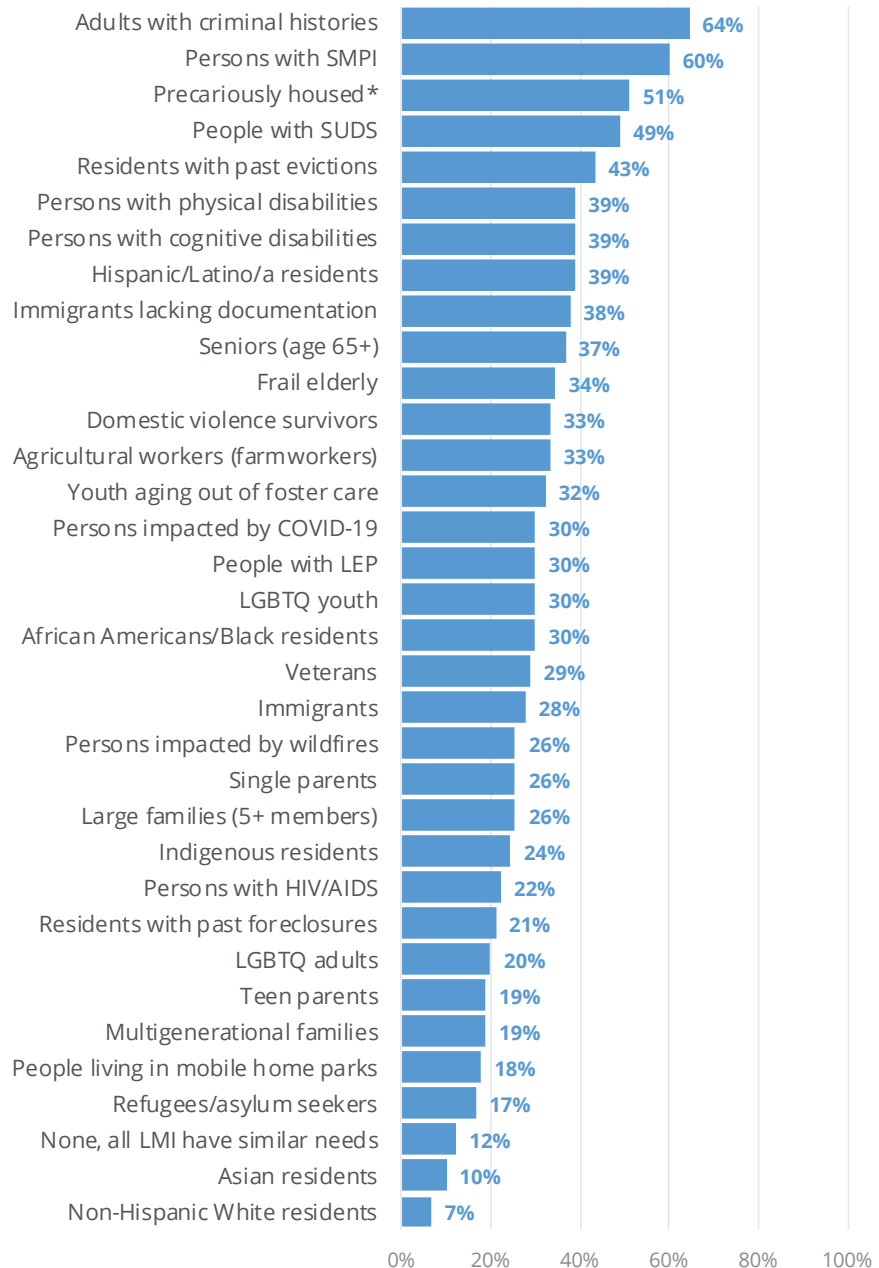
Figure A-7.
Which of the
following
populations have
disproportionately
high housing
needs relative to
all low and
moderate-income
populations
overall in your
service area?

Note:

*Precariously housed are residents living in non-traditional and/or multiple-family/"couch-surfing" situations who are vulnerable to being evicted or kicked out (e.g., due to a fight with friends). SUDS = substance use disorders, SPMI = serious and persistent mental illness.

Source:

Root Policy Research from the 2020 OHCS Housing Stakeholder Survey.



Housing or supportive service priorities to address disparities. To address the disparities observed among these populations, stakeholder recommend a range of service and housing solutions. These include supports for those exiting jails and prisons to have housing secured prior to release, programs to help households with past evictions secure and maintain housing, development of affordable housing in rural Oregon, and building capacity in rural Oregon to support housing stability of residents transitioning out of homelessness and for those with mental illness or substance use disorders.

- *“People with disabilities, especially mental health issues—they may get into housing with a conventional landlord, but they may have behavioral issues, or may not be able to get an accommodation. So, we need some way of keeping some type of housing support for people with mental health issues. Where they can live safely, and where they can get into housing even with a blemished history.” (Community Advisory Group focus group participant)*
- *“Having a social worker inside jails and prisons to ensure that people have housing arranged for when they get released. Incentivizing more landlords to accept tenants with criminal history. Creating more affordable housing that does not require a state-issued ID or social security number. More transitional housing programs that do not have a sober requirement.” (Stakeholder survey respondent)*
- *“I believe that more bilingual staff at agencies and more intentionally outreach to those agencies that serve BIPOC are needed. In the aftermath of the recent wildfires, many mobile home and manufactured home parks were destroyed, and this has disproportionately impacted agricultural workers and low income Seniors. As rebuilding efforts are crafted, these populations need to be prioritized.” (Stakeholder survey respondent)*
- *“Some sort of program or services specifically for those who have been evicted in the past.” (Stakeholder survey respondent)*
- *“Construction of supportive housing units where people transitioning out of long-term homelessness, people with mental illnesses, veterans and others can live and receive services. We need these in all parts of the state, particularly coastal counties and in rural southern Oregon.” (Stakeholder survey respondent)*
- *“Construction of subsidized 1 to 3 bedroom units for low income renters and/or buyers. Much of the available low income housing in rural areas and even smaller cities is aging, unhealthy and undignified to live in. We need counties to develop new units, particularly in counties where many homes have burned.” (Stakeholder survey respondent)*
- *“Our Native American population is also being affected largely with lack of housing options for them. They need more support and resources to help them find housing.” (Stakeholder survey respondent)*
- *“People with disabilities are in desperate need for affordable housing that can accommodate their critical needs.” (Stakeholder survey respondent)*

Participants in resident focus groups discussed the need for “second chance” housing for people with criminal histories or substance use disorders.

Homelessness. Stakeholders representing organizations that provide services to residents experiencing homelessness or who are at-risk of homelessness responded to a series of questions regarding the most impactful types of housing or services needed and

insight into the populations that are disproportionately more likely to experience or be at-risk of homelessness.

Most impactful use of resources. Increasing the affordable housing stock, emergency shelter beds, mental health resources, permanently supportive housing units, and emergency rent assistance are the top five activities stakeholders believe would have the greatest impact on persons experiencing homelessness or those at risk of homelessness in Oregon’s non-entitlement areas.

Figure A-8.
Where should housing funds be directed to have the greatest impact on persons experiencing homelessness or at-risk of homelessness in your community? (Top 20 responses)

Most Impactful Type of Housing or Service	# of Responses
Additional affordable housing stock	36
Emergency shelter beds	35
Mental health services	35
Permanently supportive housing units	34
Emergency rent assistance	33
Transitional housing units (up to two years tenancy)	31
Deposit assistance (first and last month, security, pet)	30
Financial assistance for rental application fees, background checks	30
Case management/housing navigator	30
Financial assistance in overcoming barriers to tenancy (e.g., debts owed)	29
Finding housing providers who will forgive/accept past convictions	28
Providing housing assistance benefits (e.g. Housing Choice Vouchers, VASH)	26
More flexible dollars to assist folks in overcoming these barriers	25
Addiction services	24
Finding housing providers who will forgive/accept past evictions	23
Emergency utility assistance	22
Transportation vouchers	20
Culturally-specific or responsive services	20
Life skills training/support	20
Street outreach to homeless	20

Note: n=56.

Figure presents the top 20 out of 40 potential housing and service options.

Source: Root Policy Research from the 2020 OHCS Housing Stakeholder Survey.

Participants in regional stakeholder roundtables discussed growing numbers of residents experiencing homelessness who are unsheltered. Many rural communities do not have emergency shelter bed capacity, or shelters have had to close due to COVID.

- *“A real concern for me is people experiencing homelessness. We do not have concrete solutions for that subset of our population. Including warming centers. That’s a big gap.”*
(North Coast roundtable discussion participant)

Priority housing and services for greatest impact on homelessness. When stakeholders prioritized the most impactful housing and services in a ranking exercise, the top five activities considered to have the greatest impact on homelessness in Oregon are:

- Permanently supportive housing;
- Additional affordable housing;
- Emergency shelter beds;
- Emergency rent assistance; and
- Housing assistance/vouchers.

Figure A-9 presents the prioritized housing and services activities by weighted rank score. Higher priority activities have higher scores.

Figure A-9.
Highest Priority Housing and Services Activities to have the Greatest Impact on Persons Experiencing or At-Risk of Homelessness (By Weighted Rank Score)

Highest Priority Housing or Service Activities	Weighted Rank Score
Permanently supportive housing	95
Additional affordable housing	78
Emergency shelter beds	72
Emergency rent assistance	62
Housing assistance/vouchers	55
Transitional housing (up to 2 years)	39
Utility assistance	38
Mental health services	36
More flexible dollars	35
Money management skills	32
Case management/navigator	31
Street outreach to homeless	25
Obtaining employment	21
Culturally responsive services	21
Time to find housing	13
Time to find employment	13
Transportation vouchers	12
Deposit assistance	12
Money for fees, background checks	11
Addiction services	10

Note: Higher Weighted Rank Scores indicate a greater number of respondents ranking an activity overall and ranking an activity highly. Rank Score = (number of #1 rank * 5) + (number of #2 rank * 4) + (number of #3 rank * 3) + (number of #4 rank * 2) + (number of #5 rank * 1). Highest possible score=280. n=56.

Source: Root Policy Research from the 2020 OHCS Housing Stakeholder Survey.

Reasons for priority rankings. When asked to describe the reasoning behind the housing activities they prioritized, stakeholders emphasized the stabilizing factor of affordable housing in general, and more specifically Permanent Supportive Housing (PSH) and transitional housing.

- *“The core need is more housing, particularly units that will accept tenants with criminal histories, previous evictions or other barriers. We also need short-term solutions like emergency shelters, emergency rental assistance, etc.” (Stakeholder survey respondent)*

- *“PSH and Transition Beds are top priority as are shelter beds. Mental Health and Addiction Services are necessary to help individuals stay stably and safely housed. Affordable housing stock and financial assistance are needed to help individuals remain housed.” (Stakeholder survey respondent)*
- *#1, The hardest to house people need to have PSH now to prevent further health/financial crisis. #2. We need to get people off the streets and connected to services to make other housing options more effective for this population. #3. In order for any of this to be successful, we need funding. Ideally this funding should support both Behavioral (Mental) Health AND Housing support programs. No more unfunded mandates. #4. At all <AMI income levels to provide access and reduce pressure on the existing housing stock, thus reducing (hopefully) the overall housing cost inflation (assuming that it is a supply/demand market force issue to some degree, which the data seems to support). #5. This could be structured as a tool that allows support agencies and CCOs to direct funds to the utility of the affected population to directly address their specific barriers - because individual and household needs are not monolithic and need a great deal of flexibility to overcome. support transitions from managed to independent housing as needed. 7. helping to remove barriers to the marginally housed population. This is likely the easiest item on this list to achieve by increasing funding in HRS/Flexible services to CCOs or CAP agencies.”*
- *“The need for affordable units is urgent and has been for the last 5+ years. Many people are working full time+ and STILL cannot afford rent, so transitional housing needs to be longer as well. Food, utilities, childcare—it is all related to the ability, or lack thereof, to maintain housing.” (Stakeholder survey respondent)*
- *“I believe that mental health along with substance abuse are the main barrier to people for obtaining housing. After that, come past convictions and evictions that makes it difficult for landlords to trust the renter coming out of homelessness. Also, the need for life skill training is important for these individuals to find a job that they will sustain and will help maintain housing.” (Stakeholder survey respondent)*

In a focus group with residents with lived experience of homelessness, participants shared the positive impact a motivated case worker has on helping people who are homeless transition successfully into housing.

Homeless populations with greatest unmet housing or supportive service needs. Among persons experiencing homelessness, stakeholders believe that those with mental health challenges, those who are chronically homeless, persons with substance use disorders, and those with criminal histories or felonies, and people in rural areas have the greatest unmet housing or supportive housing needs.

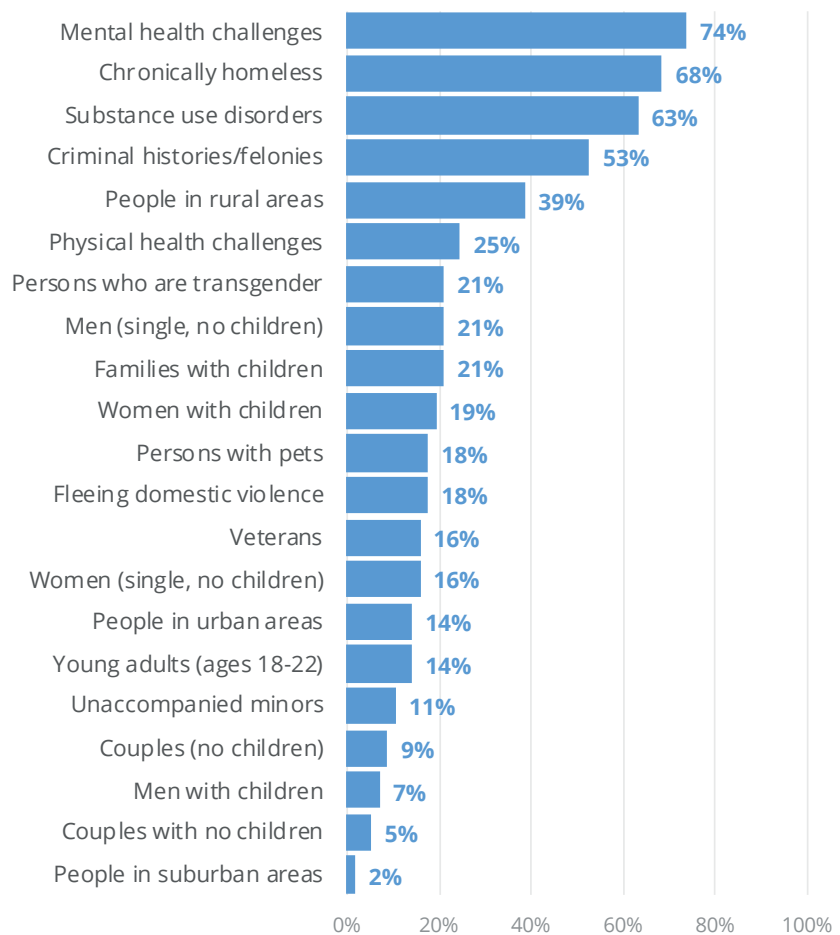
- *“Homelessness due to criminal history or substance abuse or behavioral health problems in our counties is increasingly growing. We need more transition homes, drug treatment*

facilities and programs and long term housing options for them.” (Stakeholder survey respondent)

Figure A-10.
Among persons experiencing homelessness, those with the greatest unmet housing or supportive service needs are or have...

Note:
n=57.

Source:
Root Policy Research from the 2020
OHCS Housing Stakeholder Survey.



Veterans experiencing homelessness. In focus groups, veterans and veteran serving agency staff described the high housing and service need of veterans experiencing homelessness in the balance of state. In general, need exceeds resources. For example, Lake County has significant encampments of persons experiencing homelessness, many of whom are veterans, but no VASH vouchers and, were vouchers available, no homes in which to use a voucher. Operation Rebuild Hope in Coos County has created a 14 person home for veterans using land and an old house donated by the county and a \$500,000 renovation budget. In Malhuer County, like others in central, southern, and eastern Oregon, housing is in short supply and landlords charge more per unit than the allowed maximum for VASH vouchers.

In interviews, stakeholders described a lack of housing for women veterans who are homeless. One of the difficulties with housing female veterans who are homeless is the perception among these women that veteran housing is for men. Another challenge is not being able to set aside units or vouchers specifically for female veterans, as that would be

discriminating on the basis of sex. For some female veterans, transitional housing is the most suitable first step out of homelessness, but that is not the priority of OHCS; the VA provides some transitional housing options.

Populations most at-risk of homelessness. Similarly, Oregonians considered by stakeholders to be most at-risk of homelessness are those with serious and persistent mental illness (SPMI), substance use disorders (SUDS), criminal histories, those who are precariously housed, and persons with cognitive disabilities.

Among households who are precariously housed are those who, while not meeting HUD's definition of homelessness, do not have a home of their own. They are couch surfing, moving from household to household every few days to avoid sleeping in a vehicle or outside. In focus groups, stakeholders described these households, many of whom are Latino, as being overlooked by housing assistance programs and indicative of a gap in housing resources. Taking in family who lose their home is part of Latino culture, and results in Hispanic households being undercounted in point-in-time counts and discussions of homelessness.

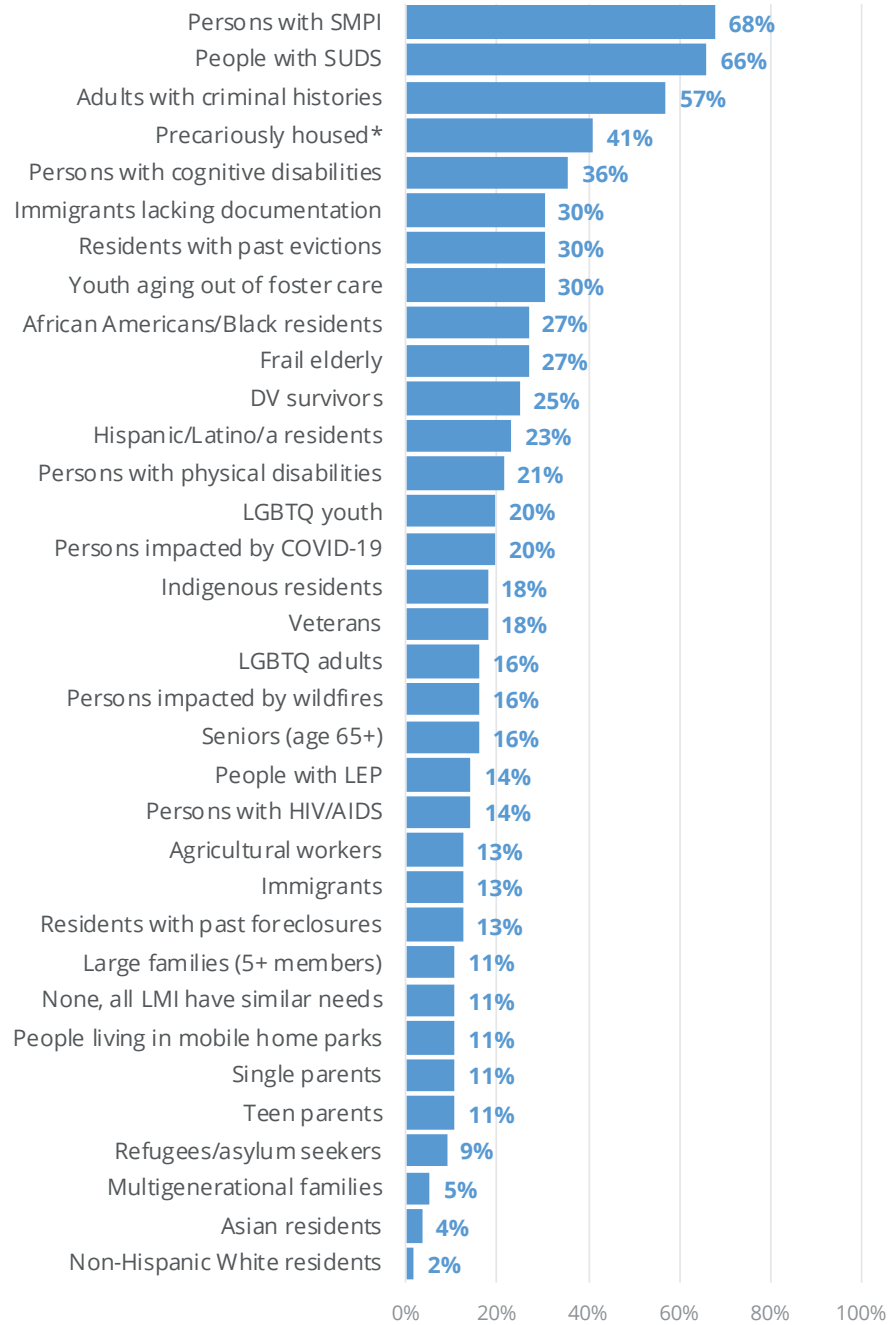
Figure A-11.
Among low or moderate income households, which populations are disproportionately at higher risk for homelessness in your service area?

Note:

*Precariously housed are residents living in non-traditional and/or multiple-family/"couch-surfing" situations who are vulnerable to being evicted or kicked out (e.g., due to a fight with friends). SUDS = substance use disorders, SPMI = serious and persistent mental illness.

Source:

Root Policy Research from the 2020 OHCS Housing Stakeholder Survey.



Community Development

Participants in the Business Oregon survey described their primary role in their community as:

- Economic development (45%);
- Community development (29%);

- Grant administrator (22%);
- Public works (17%);
- Land use planning (12%); and
- City administration or City Manager (11%).

The balance identified roles ranging from finance to regional planning to transportation planning and being an elected official.

Business Oregon Stakeholder Survey respondents identified and prioritized the greatest community development needs in Oregon's non-entitlement areas.

Highest priority needs. As shown in Figure A-12, nearly half of all stakeholders consider water and sewer infrastructure to be one of the greatest unmet community development needs in their service area, followed by infrastructure for Internet access to a community or parts of a community, downtown/Main Street revitalization, community facilities/capacity for mental health services, and microenterprise business assistance.

Figure A-12.

What are the top five greatest unmet community development needs in your service area?

Community Development Activity	% of Responses
Water and sewer infrastructure	45%
Infrastructure for Internet access to a community or parts of a community	40%
Downtown/Main Street revitalization	37%
Community facilities/capacity for mental health services	36%
Microenterprise business assistance (formation, bookkeeping, etc)	25%
Sidewalk improvements	22%
Infrastructure for Internet access to connect existing fiber/cable to homes or buildings	21%
Job training/skill development	21%
Lack of/limited capacity of nonprofits to provide needed public services	18%
Hotspots for wireless access at community locations	12%
Stormwater infrastructure	12%
Adapting existing facilities to meet CDC, state, or local public health guidelines	12%
Public transit	10%
Capacity building and technical assistance	10%
Community centers (general)	9%
Community facilities/capacity for food bank/food provision	7%
Community facilities/capacity for Head Start or Early Childhood Education programs	7%
Programs to increase digital literacy (e.g., basic Internet skills)	7%
Removal of structural barriers to achieve ADA accessibility	7%
Flood drainage infrastructure	7%
Other type of community facility	6%
Internet-capable devices (e.g., smartphones, tablets) for residents in need	6%
Historic preservation or restoration	6%
Community facilities/capacity for domestic violence shelter	4%
Community facilities/capacity for senior centers	4%
Community facilities/ capacity for libraries	3%
Community facilities/ capacity for fire stations	3%

Note: n=67.

Source: Root Policy Research from the 2020 Business Oregon Community Development Stakeholder Survey.

In stakeholder roundtables, participants described their community's public works infrastructure, access to the Internet, and the need for childcare as critical community development needs.

- The most pressing community development needs identified by Columbia Gorge/Northeast Oregon stakeholders include broadband Internet access, replacing septic with sewer, and acquiring land and investing in infrastructure to support local economic development. Childcare is also a longstanding need in the region, a situation made more critical by loss of providers and changes in provision rules resulting from the COVID pandemic.
- Water and sewer infrastructure, broadband access, childcare, technical assistance to write successful grant proposals and increasing local capacity to manage infrastructure and other projects are the most pressing community development concerns raised by participants in the Central/South Central and Southeast Oregon stakeholder roundtable discussion. Participants also described the need for small area income studies, so that CDBG funds can be directed to pockets of extreme poverty in Census tracts that otherwise do not meet LMI criteria. A lack of housing for higher income employees has impeded economic development. For example, the Red Rock biofuels plant is nearly ready for production, but the company is having great difficulty recruiting a management team due to a lack of housing.
- Addressing the region's aging water and wastewater infrastructure, electric system upgrades, broadband infrastructure, and childcare are the most urgent community development needs described by participants in the North Coast stakeholder roundtable discussion. *"Broadband is one of the top projects in our strategy list, Some communities have built their own solutions but some have no funding for that. There are large spots with no coverage."* Participants shared that, for communities with no paid staff, participating in the CDBG program is unrealistic unless funding is available to pay for project management and compliance.
- Among participants in the Willamette Valley stakeholder roundtable, affordable childcare and infrastructure to facilitate affordable housing development are the primary community development needs discussed. Participants noted that the changes in income limits to qualify for childcare subsidies in response to the COVID pandemic have been extremely helpful to households who needed childcare but did not qualify previously. Participants encouraged the state to retain the higher income limits post-pandemic. A need to build capacity at local nonprofits to write successful CDBG applications, and other grant writing, as well as manage regulatory compliance if awarded a grant is another issue hindering community development in the region.
- With respect to community development, Southern Oregon stakeholder roundtable participants described a critical need for investing CDBG in infrastructure projects for

water and sewer. In their experience, the funding maximums for infrastructure projects are often too low and noted that it is very difficult for small towns to fund the required income surveys. Southern Oregon communities need workforce development, particularly for skilled tradespeople. The lack of childcare and lack of dependable or affordable broadband are also needs that hinder economic and community development. The South Coast Development Council started a Broadband Consortium to begin to address the issue and have found there are not enough funds to support broadband development.

- Participants in the South Coast stakeholder roundtable emphasized the need for economic diversification and workforce development in the region. Trade training and apprenticeships, especially in the maritime (“Blue”) economy is needed, as communities have identified pursuing Blue jobs as an economic development strategy. This region also experiences economic development limitations due to a lack of adequate broadband infrastructure and access to childcare. Funding for feasibility studies, project management, and other technical assistance is necessary to successfully compete for infrastructure and other projects. The wildfires exposed a critical need for redundant communications infrastructure to ensure that residents can access information in real time even when phone lines are down.

Priority ranking of most urgent community development needs. When stakeholders prioritized the most urgent unmet community development needs, they assigned the highest priority to:

- Infrastructure for Internet access to a community or parts of a community;
- Water and sewer infrastructure;
- Community facilities/capacity for mental health services;
- Downtown/Main Street revitalization; and
- Infrastructure for Internet access to connect existing fiber/cable to homes or buildings.

Figure A-13.
Priority Urgent Community Development Needs by Rank Score

Community Development Needs	Weighted Rank Score
Infrastructure for Internet access to a community or parts of a community	88
Water and sewer infrastructure	82
Community facilities/capacity for mental health services	59
Downtown/Main Street revitalization	50
Infrastructure for Internet access to connect existing fiber/cable to homes or buildir	43
Microenterprise business assistance (formation, bookkeeping, etc)	38
Lack of/limited capacity of nonprofits to provide needed public services	37
Sidewalk improvements	32
Adapting existing facilities to meet CDC, state or local public health guidelines	21
Job training/skill development	20
Stormwater infrastructure	19
Community facilities/capacity for Head Start or Early Childhood Education programs	19
Community facilities/capacity for food bank/food provision	17
Community centers (general)	15
Capacity building and technical assistance	13
Public transit	13
Hotspots for wireless access at community locations	12
Community facilities/capacity for domestic violence shelter	11
Flood drainage infrastructure	9
Internet-capable devices (e.g., smartphones, tablets) for residents in need	8
Programs to increase digital literacy (e.g., basic Internet skills)	7
Removal of structural barriers to achieve ADA accessibility	6
Historic preservation or restoration	4
Other type of community facility	4
Community facilities/capacity for libraries	3
Community facilities/capacity for senior centers	3
Community facilities/capacity for fire stations	2

Note: Higher Rank Scores indicate a greater number of respondents ranking an activity overall and ranking an activity highly. Rank Score = (number of #1 rank * 5) + (number of #2 rank * 4) + (number of #3 rank * 3) + (number of #4 rank * 2) + (number of #5 rank * 1). Highest possible score =260. n=52.

Source: Root Policy Research from the 2020 Business Oregon Community Development Stakeholder Survey.

Stakeholders explained their prioritization selections. These ranged from local or regional factors that elevate one need over another to opportunities to address persistent issues applicable statewide.

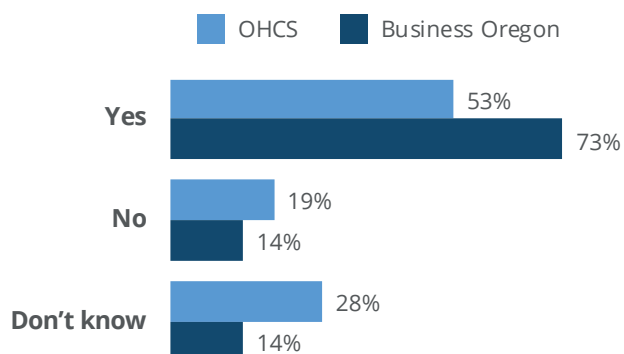
- With respect to prioritizing Business Oregon’s microenterprise program and small business lending: *“Access to capital to start a business based on character, education, possibilities of success, rather than the ability to have collateral or enough “Business record” when a business is starting there’s no such record. DCFDI mostly offer capital for equipment, but not operating capital which stops entrepreneurs from starting business with confidence on their ability to operate. This is especially detrimental for minorities.” (Stakeholder survey respondent)*
- With respect to prioritizing childcare facilities/capacity: *“I did not see a listing for transportation infrastructure but that is another very high need. Finally, childcare. Business assistance doesn’t work if employees don’t have access to safe childcare.” (Stakeholder survey respondent)*
- With respect to the need for community facilities and small business support: *“Rural communities need accessible spaces to meet, collaborate, and promote their businesses. Isolation is a real issue in rural—even within their own towns, and worse now with COVID. Morale and mental health issues are real, but often hidden. Spaces where they can gather and access experts/other resources. Programs who support these businesses need sustainable funding as part of the state’s long-term economic development plans. Creating cultures of entrepreneurship is key to ensuring vital rural communities in Oregon over the next 10-20 years. Also ensuring the arts and cultural programs are well-funded.” (Stakeholder survey respondent)*
- With respect to prioritizing community facilities/capacity for mental health services: *“School and student support needs have increased dramatically. Mental health/drug addiction and homelessness needs increasing dramatically.” (Stakeholder survey respondent)*
- With respect to prioritizing access to Internet infrastructure and community facilities: *Klamath County’s urban growth boundary is rich in fiber optics. Outlying areas of Klamath County are significantly underserved communities who cannot effectively deploy telehealth, remote work, or distance learning due to lack of infrastructure. In addition, we do not have a tax district for community centers to really exist. There is no recreation district set to support organized arts, sports, seniors, etc. which greatly adds to a child/adult/senior’s livability.” (Stakeholder survey respondent)*

Digital divide. Respondents to both stakeholder surveys believe there are barriers to digital/broadband access in their service area, as shown in Figure A-14.

Figure A-14.
Are there barriers to Digital/Broadband access in your service area?

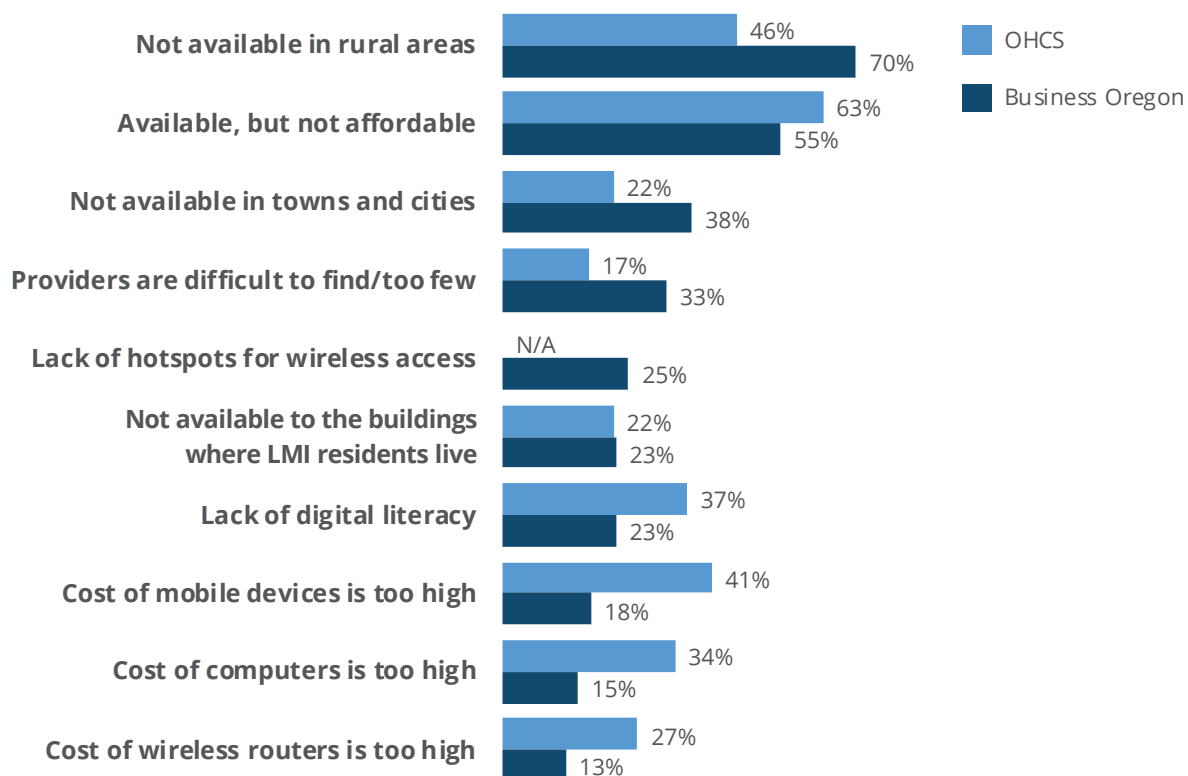
Note:
n=78 OHCS. N=40 Business Oregon.

Source:
Root Policy Research from the 2020 OHCS Housing Stakeholder Survey and the 2020 Business Oregon Community Development Stakeholder Survey.



Primary barriers to digital/broadband access. The greatest proportion of community and economic development stakeholders consider the primary barriers to digital broadband access to be a lack of availability in rural areas, while the greatest proportion of housing and human services stakeholders identify unaffordable service to be the primary barrier. In general, the primary barriers identified by both groups of stakeholders center on lack of availability, service that is available but unaffordable, and lack of affordable devices to access the Internet.

Figure A-15.
What are the primary barriers to accessing Digital/Broadband in your service area?



Note: Lack of digital literacy includes lack of basic computer, Internet, and email skills. Numbers add to greater than 100 percent due to multiple response. n=40 OHCS respondents and n=41 Business Oregon respondents.

Source: Root Policy Research from the 2020 OHCS Housing Stakeholder Survey and the 2020 Business Oregon Community Development Stakeholder Survey.

Due to the barriers to digital/broadband access identified above, nearly seven in 10 Business Oregon survey respondents believe it is difficult for small business to succeed, and two-thirds think that lack of access increases social isolation for the elderly or other populations vulnerable to COVID. Other economic and social difficulties experienced by residents due to the digital divide include difficulties applying for jobs and preventing residents from getting health care information and assistance.

Business Oregon CDBG program effectiveness. Participants with experience with Business Oregon’s Microenterprise, Public Works, Community/Public Facilities, Regional Housing Rehabilitation Grant/Loan, and Emergency Projects programs shared the strengths and challenges of these programs and made suggestions to improve the effectiveness of each. It is important to note that one of the most common aspects of the CDBG programs stakeholders consider to be working best is the staff of Business Oregon with whom they interact.

Microenterprise grant program. About one-third or 20 respondents to the Business Oregon survey had experience with the Microenterprise grant program.

What is working best? The best aspects of the Microenterprise program are that it is available at all and that it is much more flexible than similar programs available through other agencies and that applying for Microenterprise funds is an easier process than applying for other CDBG programs. Stakeholders value the quick response time.

- *“Provides an opportunity for those wishing to start or expand a business.” (Stakeholder survey respondent)*
- *“Quick response time. This is currently one of our most agile programs.” (Stakeholder survey respondent)*

What are the challenges? Elements of the Microenterprise program, especially the collateral requirement and to some extent the jobs requirements, are a barrier to participation. One stakeholder encouraged Business Oregon to expand the organizations—Certified Entities—available to support businesses participating in the Microenterprise program.

- *“The communities we’ve worked with who participate in this program are most concerned about rural businesses not having to provide collateral and keeping fees low. Most rural small businesses are not in a position to deal with either.” (Stakeholder survey respondent)*
- *“Inconsistent messaging within Business Oregon—particularly on application forms—about requirements. Uncoordinated release of grants around the region, leading to confusion and duplication of efforts.” (Stakeholder survey respondent)*
- *“Many of the company’s we referred to this program were not funded. The barriers are too high—want too much collateral.” (Stakeholder survey respondent)*
- *“Their list of Certified Entities—that they require a business work with—should be expanded. It’s leaving off several programs that are highly qualified to support these businesses (e.g. many accelerator programs in the state, Oregon RAIN, The Foundry, OTBC, TIE Oregon, etc.).” (Stakeholder survey respondent)*

Suggestions for greater effectiveness. In addition to addressing the challenges discussed above, offering grants or a combination of grants and loans, providing technical assistance for small businesses along with a loan, expanding the number of organizations authorized to administer funds, and expanding community outreach are the primary suggestions for improving the effectiveness of the program.

- *“Offer grants and not loans. Or offer a combo of grants and loans. Expand the list of approved organizations for them to work with. Reduce collateral requirements. And forgive a portion of the existing loans that have been awarded.” (Stakeholder survey respondent)*
- *“If HUD could loosen restrictions/auditing requirements, that would help. Being able to offer technical assistance and some types of business services (like paying for a computer and software subscriptions like QuickBooks, paying for services like website design, graphic artists, accountants, marketing consultants) to microenterprises would also be helpful.” (Stakeholder survey respondent)*
- *“Partnering loans with technical assistance to small rural businesses is essential to success.” (Stakeholder survey respondent)*
- *“Contract with more partners in different communities to administer funds—more options than MERIT.” (Stakeholder survey respondent)*
- *“It is working, however, there is no follow up in place. It would be ideal if Business Oregon could do 6 and 12 month follow up to collect business use and grant effectiveness data.” (Stakeholder survey respondent)*

Public Works—Water and Wastewater Improvements program. About one-third or 19 respondents had experience with Business Oregon’s Public Works program.

What is working best? Stakeholders familiar with the Public Works program complimented Business Oregon program staff in their region, the two-step grant process (design and construction), and the critical contribution the Public Works program makes to improving infrastructure quality in rural Oregon.

- *“I really like the 2 step grant process where we apply for design and then construction later. Design takes a while and it's nice to have a solid plan in place with accurate cost estimates to apply for construction.” (Stakeholder survey respondent)*
- *“There is newer staff and staff who desire to serve (better than before) but still there is way to much red tape that needs to be removed. Biz Oregon does not need to create extra or more layers of requirements. Keep it simple and get programs and results to Yes.” (Stakeholder survey respondent)*
- *“Provides valuable support to cash-strapped communities to improve aging infrastructure. The cost of these improvements is far above what most communities can afford.” (Stakeholder survey respondent)*
- *“Low interest, fast turnaround times (compared to other sources), low barriers and requirements for entry.” (Stakeholder survey respondent)*

What are the challenges? Stakeholders' descriptions of challenges include difficulty applying due to a lack of local staff or consultant grant writing expertise, perception that systems that are "out of compliance" get priority over systems needs in other communities, additional HUD requirements that increase costs (e.g., prevailing wage), and lack of timely review by the Department of Environmental Quality (DEQ).

- *"They are lengthy grant application processes which can be daunting. The other thing is it should be more open as far as fixing a need. Not just a compliance related. We should be addressing issues proactively and not reactively."* (Stakeholder survey respondent)
- *"Sometimes it doesn't seem like lower-cost options can be implemented when they might be good enough for a community. Some HUD/federal regulations also increase the cost of construction."* (Stakeholder survey respondent)
- *"Small entities don't have grant writers or generally don't know how to apply."* (Stakeholder survey respondent)
- *"Application limits, expenditure rates, quarterly application process prevent good projects from moving ahead. Also requiring DEQ approval of facilities plans before even applying prevents some communities from applying. DEQ review can take 5-6 months."* (Stakeholder survey respondent)
- *"The new project review format needs some tweaking to expedite the process. It seems like projects can get lost in the shuffle, or the shuffle itself isn't transparent enough, so it's hard to tell what's happening."* (Stakeholder survey respondent)

Community/Public Facilities program. About one in five or 11 respondents are familiar with the Community/Public facilities program.

What is working best? Regional program staff, grant amounts, and continuing dedication of funds for community/public facilities are the aspects of the program stakeholders consider to be working best.

- *"New staff who are not entrenched staffers that are thinking outside of the box."* (Stakeholder survey respondent)
- *"Staff in our region is great. I would like to see them work directly with communities to offer more technical assistance though in getting applications to a point of submission."* (Stakeholder survey respondent)
- *"It's great that the communities are able to serve their low to moderate income residents with much needed facilities."* (Stakeholder survey respondent)

- *“Large grants available compared to other programs. Great review team that works to make the funding fit a variety of projects.” (Stakeholder survey respondent)*

What are the challenges? The few comments describing challenges with the community facilities program included difficulties with the application process and lack of local expertise to successfully prepare applications, overhead needed to comply with regulations, and a perception that the program’s regulations or “rules” are difficult for rural communities to successfully apply or administer the program.

- *“Very cumbersome application process.” (Stakeholder survey respondent)*
- *“There is a certain amount of additional overhead necessary in order to meet requirements. Sometimes those additional costs and steps delay project construction.” (Stakeholder survey respondent)*
- *“Complying with labor standards.” (Stakeholder survey respondent)*
- *“The rules can be restrictive and almost impossible for rural communities to abide by.” (Stakeholder survey respondent)*

Suggestions for greater effectiveness in the Public Facilities program to respond to unexpected crises. Technical assistance to develop emergency plans, allowing facilities to be used to meet other community needs in response to a disaster, and informational trainings to inspire communities to participate in the program are the primary methods by which stakeholders believe the Public Facilities program can best be positioned to help respond to a crisis.

- *“Make it a short term strategy. After a disaster, hold more informational programs/trainings about how the program works in rural communities. Give communities something to strive for. That would reduce fear and anxiety and provide a new community goal.” (Stakeholder survey respondent)*
- *“Technical Assistance would help. In smaller towns that don't have emergency plans, to provide them with TA to write a plan. Contact the smaller communities to find out what their needs are.” (Stakeholder survey respondent)*
- *“By funding proactive projects that prepare rural spaces for disasters and pandemics. Planning for spaces could include these sorts of inputs to arrive at more fully functional buildings.” (Stakeholder survey respondent)*
- *“Allow these facilities to be uses/ rehabbed for basic needs-- shelter, food services, etc.” (Stakeholder survey respondent)*

Regional Housing Rehabilitation Grant/Loan program. About 18 percent or 10 respondents have experience with the Housing Rehabilitation Grant/Loan program.

What is working best? Stakeholders appreciate the flexibility built into the program, including allowing agencies to serve manufactured home parks. Nearly all referenced the need for this program in their service areas.

- *“I think it's a great program. It's obviously finite in its ability to reach all the folks in need, but it still serves a great need in our communities.” (Stakeholder survey respondent)*
- *“Glad it was opened up to help serve manufactured home parks.” (Stakeholder survey respondent)*
- *“Flexibility for local programs to tailor to their needs.” (Stakeholder survey respondent)*
- *“This has been fabulous for our organization. It creates meaningful relationships between rural communities and their local community and county governments.” (Stakeholder survey respondent)*
- *“Our regional housing organization has done many of these and they have all been successful.” (Stakeholder survey respondent)*

What are the challenges? The primary challenge associated with the program is that need exceeds the resources available. Finding contractors to perform the work and increasing costs of materials are other challenges.

- *“Limited funds. There is extreme need for more funds.” (Stakeholder survey respondent)*
- *“None. The program is well run and the technical support for our grant efforts have been great.” (Stakeholder survey respondent)*
- *“Contractors getting bids. Lack of contractors. Price of materials are going up.” (Stakeholder survey respondent)*

Emergency Projects grant program. Eight stakeholder survey respondents had experience with the Emergency Projects program.

What is working best? Flexibility and the ability of staff to quickly respond and adapt policies to be more responsive to needs in the community are considered strengths of the program.

- *“I am pleased Business Oregon staff was able to work quickly to adjust policies and respond to the crisis. Greater flexibility in the use of funds is needed.” (Stakeholder survey respondent)*

- *“RDI has supported communities applying for this funding, and appreciates the flexibility and streamlined processing for rural towns who need the technical assistance and/or other support.” (Stakeholder survey respondent)*
- *“Flexibility and commitment from Business Oregon project managers.” (Stakeholder survey respondent)*

What are the challenges? The most common challenges identified by stakeholders was a lack of flexibility in the uses of funds and burdensome application and compliance requirements.

- *“Greater flexibility in the use of funds is needed. We need to be able to respond to local needs and a broad stroke of eligible programs assumed to work in one part of the state won’t work in another. Flexibility in the program and staff thinking outside the box is needed.” (Stakeholder survey respondent)*
- *“Too many requirements. Not all of them needed. Not enough funding from a statewide perspective. Inefficient delivery method.” (Stakeholder survey respondent)*
- *“Complex and time-consuming documentation requirements.” (Stakeholder survey respondent)*
- *“Too limited in scope and too many restrictions on types of projects than can be funded.” (Stakeholder survey respondent)*

Other suggestions. Among stakeholders’ comments about Business Oregon’s current CDBG programs, two suggestions merit mention: One encourages the state to consider using CDBG (or other) funds to support grants for residents of manufactured home communities to buy the part to preserve long term affordability. The second is to dedicate funds to replace housing when conditions are so substandard that repairs cannot be made.

- *“Developers are starting to buy up manufactured home parks to increase rents or turn these in to single family developments. Manufactured home parks provide affordable housing for a number of persons and families. I would like the program broadened to allow residents to apply for grant funds to purchase the parks to protect themselves and work with partners like CASA to do so.” (Stakeholder survey respondent)*
- *“Funds are needed for replacement of substandard homes that can’t be rehabbed and for new construction.” (Stakeholder survey respondent)*

COVID19 and Wildfire Impacts

As noted above, community engagement was conducted during both the 2020 COVID pandemic and the devastating wildfires that swept across much of Oregon. To inform the

five-year plan, Business Oregon and OHCS asked stakeholders to assess the impact of COVID on local housing and community development needs, including whether the pandemic created new challenges or exacerbated existing needs.

How have community development needs changed as a result of COVID and the wildfires? The pandemic and wildfires exposed the precarious financial situation of small business; caused a loss of childcare providers or fewer children able to be served; and increased reliance on Internet access for employment and education. The pandemic complicated the delivery of services due to the lack of facilities to provide in-person services—previously delivered in shared buildings. These crises also increased the need for mental health facilities and services, which were already lacking in rural areas. These are among many examples of changes in needs raised by stakeholders as a result of the COVID crisis and made more critical by wildfires.

Small business.

- *“There is a greater need for grant funding and patient capital and technical assistance for businesses. We need to develop better ways of connecting remotely with the community so that they are really involved in public input and exchange of information.” (Stakeholder survey respondent)*
- *“Businesses have struggled to stay open and follow mandated guidelines which should be based on region, not statewide (example of a rural zip code area with ZERO covid cases should not have to be burdened with excessive rules).” (Stakeholder survey respondent)*
- *“Cash flow has become an issue for businesses in the region, state and nation.” (Stakeholder survey respondent)*
- *“Many small businesses are closing or struggling to survive. Businesses need good information, in many cases financial support, and they need patience as they try and pivot to meet new requirements. Latino workers and businesses have been hit particularly hard.” (Stakeholder survey respondent)*
- *“The tourism business has taken a huge hit. Lack of large gatherings has hurt nonprofits doing fund raising. Small businesses that have had to close and reopen with limited space may not make it through winter months.” (Stakeholder survey respondent)*
- *“Small businesses have struggled especially in our downtown as there is not adequate space for outside operations or expansion in close proximity.” (Stakeholder survey respondent)*

Special needs populations.

- *“Access for disabled has been highlighted as a huge need as isolation has increased among that population. We have a digital divide.” (Stakeholder survey respondent)*

Digital divide.

- *“Since COVID hit, the lack Internet bandwidth to these locations (Baker County ranches and farms) has become so apparent—it is nonexistent. It took a month to get online school up and running—people were scrambling, not just the underserved. ... The district thought of hotspots... A month later, we got hotspots. If a family had to get Internet, the cost to get it up and running was \$180. **They were not eating to get Internet.** Families with multiple kids could not get enough bandwidth for all kids to be on at once. I also had A/B students starting to flunk and get so depressed. I also had high school students leaving classes to help and support their younger siblings who were learning at home.” (Latino community stakeholder interview participant)*
- *“COVID has exaggerated the gaps in the have/have nots with internet access. Many of our rural areas are struggling to remain connected and are unable to work remotely. Business and education in these areas are quickly falling further behind.” (Stakeholder survey respondent)*
- *“The barriers caused by the lack of good internet are increasingly made clear. Businesses have had to increasingly focus on online sales and marketing.” (Stakeholder survey respondent)*
- *“Broadband access has become a huge barrier to equity in education, workforce, and access to federal benefits (unemployment and more).” (Stakeholder survey respondent)*
- *“The need for businesses and school children utilizing internet and web based activities have caused a huge strain and need on whatever services are there.” (Stakeholder survey respondent)*

Childcare.

- *“COVID rules have caused a lack of childcare for those who want to work; getting people back to work has been a huge barrier as they are making \$1000/week not working and then lack of schools open or childcare for their kids.” (Stakeholder survey respondent)*
- *“Finding childcare providers is a major barrier for the workforce. We have facilities but cannot attract providers due to low wages, risk to exposure, other factors.” (Stakeholder survey respondent)*
- *“One of the clinics has its own childcare center, one homebased in my neighborhood, at least two commercial childcare centers. We also have Headstart. Our Building Healthy Families organization has early childcare for 0-3 and they are an institution that offers wraparound services. Anecdotally, we always hear about big gap in available slots versus need. The childcare center at the church I attended is probably not even within regulations. It would be nice to invest in planning.” (Columbia Gorge/Northeast Oregon roundtable participant)*

Community services and facilities.

- *“Many of the services in our community (Hood River Shelter Services, the Hood River Farmers Market) have been ‘making do’ without permanent locations for years. With COVID, many of the locations for previously used (schools, churches, etc.) are now no longer options.” (Stakeholder survey respondent)*
- *“Adaptation is the need now. Service providers and small business are changing their models to meet guidelines.” (Stakeholder survey respondent)*
- *“Boards, Government councils have trouble meeting. Local paper started streaming local County Court meetings and the number of views are tens of times greater than attended meetings prior to COVID.” (Stakeholder survey respondent)*

Rural community needs.

- *“In our experience to date, the decisions about how emergency resources will be used is concentrated with a small group of people at the state level with limited interest and/or experience in rural. In addition, rural communities do not often have the capacity to understand and respond quickly to COVID funding opportunities in what has been a very fast-paced funding environment.” (Stakeholder survey respondent)*
- *“Rural communities thrive off of in-person interactions. The added isolation of COVID are creating extra struggles for business owners. Mental health is a concern.” (Stakeholder survey respondent)*
- *“Our Downtown small business center has seen a squeeze in the resiliency of the individual businesses. I would suggest that the major other parts of our community that have been affected by COVID are social aspect with lots of organizational activities being canceled. It appears our housing development has slowed also.” (Stakeholder survey respondent)*

How has the community responded to address these needs? The strength of Oregon’s rural communities are evident in how residents came together to respond to needs. Stakeholders described communities rising to meet the needs of their neighbors through increased collaboration, engagement, volunteerism, helping local businesses and residents receive state and federal relief funding, and beginning to address the digital divide are among the ways that communities have tried to address the needs.

Increased collaboration, communication, and volunteerism.

- *“Most of the counties have stepped up to help on the social services side. Some TA providers have pivoted quickly (Oregon RAIN) to provide just-in-time services to help keep doors open, jobs retained. Seeing more service providers partner-up like then never have before showing Oregonians can rally during a crisis. Hopefully we can sustain this momentum of win-win collaborations.” (Stakeholder survey respondent)*

- *“RDI has created a facebook page (PNW Rural Action Network) to disseminate information to rural communities about COVID and wildfire resources, and legislative action alerts for legislative issues with rural impact. We have also been pivoting the methods we use to provide technical assistance to respond to crisis needs in a virtual medium, and to help communities plan for long-term recovery and resilience.” (Stakeholder survey respondent)*
- *“We have an active nonprofit sector and giving especially through religious organizations has helped needy residents.” (Stakeholder survey respondent)*
- *“All hands on deck—We have a boots on the ground group that looks solely at the business and economic impacts that the businesses are having and those partners are working as fast as they can to assist!” (Stakeholder survey respondent)*
- *“The Food Pantry ramped up services and in March and April, saw our users nearly double. The community has stepped up to volunteer and donate as much as they can to the pantry. As for the inability to watch kids perform and compete, the natives are getting restless. There’s a lot of anger.” (Stakeholder survey respondent)*
- *“Keep serving and do not let fear drive or destroy service and openness.” (Stakeholder survey respondent)*

CARES Act and state and other COVID relief programs.

- *“Trying to take advantage of all federal and state COVID relief programs. Trying to be proactive with our transient lodging tax funds allocations in anticipation that those funds will see a large budget cut in 2021.” (Stakeholder survey respondent)*
- *“We have done everything we can to get funds out the door quickly to the organizations who can put it to use. We are currently supporting childcare, business assistance, housing assistance, and more.” (Stakeholder survey respondent)*
- *“Direct grants and aid are the most effective. Some technical support is needed especially for businesses and renters needing help to pay rent.” (Stakeholder survey respondent)*

Business relief.

- *“Grant funding to help small businesses in the community.” (Stakeholder survey respondent)*
- *“Offering grants to businesses, offering new technical assistance services, offering somewhat more patient loan capital, connecting businesses to resources.” (Stakeholder survey respondent)*
- *“Working on outreach, providing all types of support, providing direct grants to businesses.” (Stakeholder survey respondent)*

Digital divide.

- *“Mobile hotspots have been provided by many educators, and some retailers but still, service is unreliable. The response is recognized, but no meaningful effort toward a long-term solution has been made.” (Stakeholder survey respondent)*
- *“Formed a broadband advisory committee to evaluate needs of the region. also working with childcare providers and communities to find facilities.” (Stakeholder survey respondent)*
- *“We are working projects. We hope to have more assistance from the new Broadband office at Business Oregon.” (Stakeholder survey respondent)*

Where do gaps exist? What else is needed to close those gaps? Gaps

that persist include a need for technical assistance to small business and local governments, a need for more funding overall, facility and capacity issues, the digital divide, and a need for ongoing, effective community engagement to make sure that residents and businesses can access the resources they need to recover are the most common remaining gaps identified by stakeholders.

Technical assistance.

- *“Trained staff and technical assistance are needed. Childcare and distance learning supports are still critical needs. Streamlining the regulatory process and setting achievable metrics would be helpful.” (Stakeholder survey respondent)*
- *“Grant writing training, federal grant writing training for the region - get more federal dollars to our region.” (Stakeholder survey respondent)*
- *“Increasing regulatory burdens in small, rural, LMI cities often require complex planning and alternative screening. Without better grant funded planning, Cities short-change their planning efforts to reduce debt and can arrive at less than optimal solutions.” (Stakeholder survey respondent)*

Funding.

- *“Businesses that cannot come back due to high cost of following reopening regulations.” (Stakeholder survey respondent)*
- *“Small business owners of limited means have had less access to aide. Less likely to receive unemployment. Have received some limited grants. I am sure there are many other gaps.” (Stakeholder survey respondent)*
- *“Providing more long-term financial assistance—funding.” (Stakeholder survey respondent)*
- *“Business Oregon is doing a great job getting CARES Act resources out to communities, and ensuring that rural communities are included. I see an impending gap related to the fact*

that most CARES Act services will only be provided through the end of 2020, while we see that need will be ongoing through at least 2021.” (Stakeholder survey respondent)

Facilities/service capacity.

- *“More staff, more funding, and for social service infrastructure we have a critical need for buildings/space to host programs, such as mental health crisis centers, food banks, and winter warming shelters (especially this last one!).” (Stakeholder survey respondent)*
- *“Countywide mental health and drug addiction facility that is available to all.” (Stakeholder survey respondent)*
- *“Public health programs are still insufficient to address the health crisis.” (Stakeholder survey respondent)*
- *“Childcare has also become a crisis issue to keep the economy moving. In urban areas, childcare is challenging. In rural areas, it's impossible.” (Stakeholder survey respondent)*
- *“Childcare—this should be an ‘all hands on deck’ issue. Affordable housing and homeless shelter. Public services.” (Stakeholder survey respondent)*
- *“Funding for childcare providers. More specific guidance and ease on restrictions.” (Stakeholder survey respondent)*

Digital divide.

- *“There has been a greater discussion about needs in internet service now that a lot of folks are working from home. The current system doesn't seem to keep up.” (Stakeholder survey respondent)*
- *“Broadband in rural is a gap (e.g., John Day put in an application for funds to expand their broadband, but it was turned down).” (Stakeholder survey respondent)*
- *“Broadband office at Business Oregon needs to provide more support.” (Stakeholder survey respondent)*
- *“We need better internet service and the funding to get it in place.” (Stakeholder survey respondent)*
- *“Broadband infrastructure funding is a long-term issue, so the CARES Act funding has been difficult to spend.” (Stakeholder survey respondent)*

Community outreach.

- *“I think the biggest gaps exist in the area of community engagement.” (Stakeholder survey respondent)*

- *“Proper outreach is key and nearly non-existent in Oregon or anywhere in the US.”
(Stakeholder survey respondent)*

How have housing needs changed as a result of COVID and the wildfires? Prior to the pandemic and wildfires, a lack of affordable housing to rent and to buy was a persistent challenge in communities across Oregon. Unemployment, business closures, increased stress, and naturally occurring affordable housing (NOAH) stock destroyed in the fires result in a greater number of households in need of housing and services, including many households who have not previously required assistance. Stakeholders also identified people of color, people with disabilities, immigrants who are undocumented, and residents who are harder to house as populations that have been disproportionately impacted by these twin crises in greater Oregon.

Greater number of households in need.

- *“The pandemic has increased the number of unmet needs significantly. In addition, wildfires have further added to the increase.” (Stakeholder survey respondent)*
- *“Larger number of households in need; households have lower income—especially households headed by people of color.” (Stakeholder survey respondent)*
- *“Many more people are now at risk of eviction and are risking other needs to stay housed.” (Stakeholder survey respondent)*
- *“The housing needs previous to COVID continue to be the same, but now there are more people being affected including home owners and the people currently renting a place who have lost their jobs and are behind on mortgage or rent, as well as utility payment.” (Stakeholder survey respondent)*
- *“I see a lot of small, mom and pop businesses having a lot of trouble surviving way more than before the Corona Virus hit our country and not able to pay their bills or employees and having to close for good.” (Stakeholder survey respondent)*
- *“Most communities that we serve have been doing ok during COVID, however-since the recent fires, more populations are impacted by the loss of existing affordable housing.” (Stakeholder survey respondent)*

Housing stability.

- *“Keeping people safely housed once the rent moratoriums wear off is a big concern.” (Stakeholder survey respondent)*
- *“The needs are significantly exacerbated by COVID, particularly public services (social services). The need for housing is also incredible and will be well beyond the breaking point after the fires.” (Stakeholder survey respondent)*

- *“COVID has made our housing and digital infrastructure needs significantly more apparent.” (Stakeholder survey respondent)*

People with disabilities.

- *“People with disabilities, specifically mental health disabilities are desperate for shelter.” (Stakeholder survey respondent)*
- *“I have noticed a great amount of the older adults having difficulties, especially SSI/SSDI populations having problems finding affordable housing because low monthly payments are not enough to pay rent, utilities, food, clothing, and the high cost of health insurance.” (Stakeholder survey respondent)*
- *“The HIV/AIDS population is also at an hinderance, where they have a harder time finding housing due to the stigma of their disease and of past behaviors, such as, drug abuse, landlords are very reluctant to rent to them.” (Stakeholder survey respondent)*

Disproportionate impacts.

- *“Immigrants who do not have a legal status are not able to get into housing due to lack of documentation. Those who have been evicted in the past.” (Stakeholder survey respondent)*
- *“More people in need, political crisis plus the fires plus COVID impacting essential workers have really put many Hispanic families in dire situations.” (Stakeholder survey respondent)*
- *“Greater number of people in need—this is true across all sub-populations—but agricultural workers, immigrants, and Seniors appear to be disproportionately impacted.” (Stakeholder survey respondent)*
- *“COVID has elevated the disproportionate housing needs of BIPOC Oregonians, but those existed before.”*
- *“People with past evictions are unable to find a place to rent during COVID, and I have been told the reason is that the landlords are afraid they will not pay rent after moving in / during the pandemic, so their applications are just being denied.” (Stakeholder survey respondent)*
- *“Low and moderate income (LMI) communities have been disproportionately impacted by fires—they may have had no homeowners insurance or much less coverage, some of these homes had lead and asbestos and so a lengthy cleanup is required before rebuilding. Mobile homes must be within 25 mile radius to be rebuilt using FEMA, but the whole town might be gone, so there is no option to rebuild within the set limits. Once rebuilt, taxes will likely be higher. Some Red Cross funding has been pulled from families with mixed immigration status.” (Southern Oregon roundtable discussion participant)*

Impact on homelessness. Most stakeholders (60%) believe that homelessness has increased in their area due to the COVID pandemic. Nearly two in five stakeholders' assessment of the populations most at-risk of homelessness changed since the onset of the COVID pandemic. These stakeholders observe that immigrants who are undocumented are especially at-risk of homelessness due to job loss and inability to participate in federal financial relief and other benefits programs. Other populations not previously at-risk of homelessness are those who experience job loss and long-term unemployment resulting from business closures. Several stakeholders mentioned barriers to accessing services resulting from lack of access to public facilities like libraries to access the Internet or print required forms.

- *"The percentage of our population currently experiencing homelessness who meet the definition of chronically homeless rose significantly in the last year. We have had good outcomes with helping those experiencing homelessness transition to stable housing as it becomes available and need more transitional housing units to help individuals move toward permanent, affordable housing. Many Jackson County citizens work in service industry and agricultural jobs and do not earn a living wage. The very low housing inventory here—**this has been made exponentially worse by the dramatic loss of low income housing during the wildfires**—coupled with the low earnings speaks to the need for more rental housing for folks earning 30%, 60% and 80% of AMI." (Stakeholder survey respondent)*
- *"Yamhill County is exceptionally hard hit by fires and COVID, but our homeless population has expanded greatly since 2008. It was 600, and is now up to 1,428, and the numbers are going up due to COVID, layoffs, and fires. We can't keep up. I would like to see more affordable or low income housing in McMinnville and the larger cities and some kind of low barrier campground for those who can't afford to be in low income housing, and a navigation center." (Community Advisory Group focus group participant)*
- *"We have a major need in transitional housing, mental health services and other outreach services for our unhoused population." (Stakeholder survey respondent)*
- *"People that don't have access to public benefits because of documentation status have been more impacted. Higher cases of COVID, more job loss, not able to access stimulus payment and unemployment benefits." (Stakeholder survey respondent)*
- *"I have noticed more unemployment due to businesses having to downsize employees or close down the business. More cases of suicide, and drug use leading to homelessness in most cases." (Stakeholder survey respondent)*
- *"Harder to get access to assistance—no libraries open to get WiFi or print things. Other services closed." (Stakeholder survey respondent)*

Reduction in emergency shelter beds/facilities.

- *“There aren’t enough homeless shelters and/or assistance for those experiencing homelessness.” (Stakeholder survey respondent)*
- *“Need has grown and less is available. Homeless are not able to secure housing and no development has occurred in majority of the Southern Oregon Service Area.” (Stakeholder survey respondent)*

Housing recovery recommendations. Stakeholders offered advice for how the state can best support community recovery from the pandemic. Rent assistance, including payments to landlords to make them whole, funding supportive services, increasing the number of affordable units statewide, increasing the number of communities with emergency shelter capacity in rural Oregon, and expanding partner networks more effectively reach and serve people of color and immigrants and reduce disparities in populations served.

Rent assistance.

- *“Short-term—More short-term rent assistance to prevent eviction due to nonpayment of rent. Long-term—long-term rent assistance to help households experiencing a long-term loss of income due to COVID.” (Stakeholder survey respondent)*
- *“Ongoing rental assistance is needed to keep residents in non-profit owned units. This is the only way that non-profit housing sector will be able to weather the economic uncertainty while not requiring residents to go to even more extraordinary lengths to stay housed.” (Stakeholder survey respondent)*
- *“Our organization has seen 25+ years of the housing need changes from needful to critical. Our advice is allocate funding to landlords for rental costs to help absorb this crisis.” (Stakeholder survey respondent)*
- *“Continue efforts to mitigate evictions; increase rental assistance.” (Stakeholder survey respondent)*
- *“Housing vouchers with gradual shift to full payment of rent by tenants as economy in local area improves (measured by employment figures).” (Stakeholder survey respondent)*
- *“Funds to help pay for unpaid past rent/mortgage payments so they can move forward without fear of losing housing.” (Stakeholder survey respondent)*
- *“Loans could be made available to people at zero interest (similar to COVID-related PPP) with reasonable payments based on people's incomes. This may not have as substantial of a positive impact as I believe forgiveness would but it could be an option for mitigating some of the negative forthcoming pandemic impacts.” (Stakeholder survey respondent)*

Supportive services.

- *“We need very low income housing. Accessible units. Supportive services to help people maintain their recovery.” (Stakeholder survey respondent)*
- *“Give more money for supportive services like training and resources of how to stay safe when you are unhoused, immune compromised and at risk if you contract COVID.” (Stakeholder survey respondent)*

Increase supply of affordable housing.

- *“As best you can, remove the 'red tape' and get dollars out to nonprofit and for-profit developers to get units under construction. Consider allowing developers to come forward with innovative ideas for how to best get units now--allow for concept ideas for housing rather than overburdening projects with additional criteria. It's okay to have a 60% and below AMI property and promote equity through marketing and community engagement.” (Stakeholder survey respondent)*
- *“Provide direct housing subsidies for qualified applicants. Support construction of more units for both rental and sale at affordable rates (30% of gross income).” (Stakeholder survey respondent)*
- *“Make it easier to get funding for creative, alternative housing options like tiny homes, co-ops and shared housing.” (Stakeholder survey respondent)*
- *“Help to overcome zoning restrictions, limit vacation AirBnB in favor of affordable housing for residents, provide financial incentives for alternative housing that maps out to less than \$100k per unit to build.” (Stakeholder survey respondent)*
- *“Investment in more extremely low income and low income housing. Discussions around manufactured home parks owned by residents.” (Stakeholder survey respondent)*

Increase shelter capacity and transitional housing.

- *“Shelters or transitional housing for families in rural areas.” (Stakeholder survey respondent)*
- *“More lower income units, but in safer neighborhoods. Little to no homeless shelters in Eastern Oregon communities. NEED SHELTERS.” (Stakeholder survey respondent)*
- *“Consider some type of transitional shelters that can house multiple people in order to stabilize them.” (Stakeholder survey respondent)*
- *“Provide affordable transitional housing with sanitizing & showering stations.” (Stakeholder survey respondent)*

Expand network of partners and funding to reduce disparities in access to housing and services.

- *“Assign future funds/grants to different community partners. I feel like in our area its always the same organization who receives this. And while The Next Door Inc is a great organization, they may not have the hands on experience that other community partners have such as Mid-Columbia Medical Cerner community outreach dept., Bridges to health pathways and OHP assister. We need to think outside the box and meet people in need where they are. Otherwise we are just covering up the need with a band aid. Community health workers are key in this. Search for organizations who use community health workers outside their organization’s walls. The more hands on experience the deeper the connection with the community. This also allows underserved populations to open up and give us the feedback we need to address these disparities.” (Stakeholder survey respondent)*
- *“Make sure there is a mechanism to distribute assistance that considers people who have never accessed services and are not attached to a provider or agency.” (Stakeholder survey respondent)*
- *“More funding for housing support for undocumented. Financial housing support programs should be equal regardless of documentation status.” (Stakeholder survey respondent)*

Community development recovery recommendations. Stakeholders shared advice for how the state could support local recovery from the pandemic and wildfires. Responses shared themes of encouraging the state to look for opportunities for flexibility in grantmaking and programming, help to bridge the digital divide, reduce administrative burdens and complexity of compliance, plan for and fund long-term recovery efforts.

- *“For more rural areas, definitely focus on funding broadband expansion programs. Reduce barriers to access funding for social service partners, and reduce the complexity of reporting requirements in consideration of the major capacity challenges faced by your partners.” (Stakeholder survey respondent)*
- *“In the initial crisis stage, resources are needed for pivoting business models, mobile hot spots, childcare, and access to financial and legal expertise to navigate crisis decision-making. In the longer term, rural resources are needed for entrepreneurial ecosystem development, broadband infrastructure, and leadership development.” (Stakeholder survey respondent)*
- *“Continue support to small businesses. Take a patient, encouraging rather than punitive approach to new regs.” (Stakeholder survey respondent)*
- *“Be as flexible and responsive to community needs—not one size fits all approach. The devastating wildfires highlight the need to be adaptive and resilient in a time of crisis.” (Stakeholder survey respondent)*

- *“Improve the responsiveness, adaptability and efficiency of the State’s public health and EOC programs.” (Stakeholder survey respondent)*
- *“Each community is different, so be open to ideas you might not have thought of. For example, our restaurant could have used funds to assist displaced employees, but business boomed at the coffee cart in town.” (Stakeholder survey respondent)*
- *“I would suggest that anytime major economic impacts hit this region, the unhoused issues compound themselves harder than most other more resilient demographics. I think our City and region will have some major and difficult decisions to make over the next several years regarding housing conditions and our unhoused population.” (Stakeholder survey respondent)*
- *“We as a community are hard workers however not being able to do our job because the internet is spotty or cuts out constantly does not help with us being able to do our jobs. I know because we live in the eastern part of the state that we are thought of as farmers, but most of us have degree’s and work other jobs besides farming and need computers and internet to be able to do them from home.” (Stakeholder survey respondent)*
- *“Also, support the local job creators (small businesses and startups) who will pull us out of this disaster. They need more grant funds (not loans!). They need organizations funded to support them.” (Stakeholder survey respondent)*
- *“This doesn’t end on December 30, 2020 like much of the CARES Act funding so Business Oregon and the legislature need to come up with longer term solutions.” (Stakeholder survey respondent)*
- *“I know that state and federal funds have a lot of restrictions/rules to follow. This has been cumbersome and the talk of many of our leaders. Some have expressed the need to curtail some of the rules in order to help a business or community. Example—CDBG funds that have to be disbursed within one year—it can take anywhere from 3 to 12 months for a CDBG environmental review to be conducted—so no time for construction.” (Stakeholder survey respondent)*

Priority Outcomes, Impact, and Allocation of Funds

Respondents to the stakeholder prioritized the most important outcomes from investing CDBG and other funds in housing and community development activities.

Priority housing outcomes. The top five housing outcomes prioritized by stakeholders are:

- #1—Larger supply of affordable rental housing
- #2—Expanded beds/shelters to assist persons who are homeless

- #3—Larger supply of rental subsidies/housing choice rental vouchers
- #4—More equitable dispersion of HUD resources for populations historically underserved (i.e. communities of color)
- #5—More equitable geographic dispersion of HUD housing resources

Figure A-16.

If you could pick five priority housing outcomes from investment of HUD block grant funds within Oregon in the next 5 years, what would those be?

Housing Outcome	% of Responses
Larger supply of affordable rental housing	72%
Larger supply of rental subsidies/housing choice rental vouchers	54%
Expanded beds/shelters to assist persons who are homeless	53%
More equitable dispersion of HUD resources for historically underserved populations	40%
More equitable geographic dispersion of HUD housing resources	36%
Better access to supportive services to achieve or maintain housing stability	36%
Better access to case management/housing navigation services to obtain housing	35%
More opportunities for homeownership	24%
Better condition of housing for low-to moderate-income renters	24%
More equitable dispersion across low and moderate income populations of HUD resources	24%
More housing accessible for persons with disabilities	22%
Better condition of housing for existing low- and moderate-income homeowners	18%
Co-location of housing and childcare / early learning education centers	18%
Greater independence for persons with disabilities and/or seniors	15%
Housing that is more energy efficient	14%
Better access to housing information and counseling services	9%
Historically preserved commercial and residential structures	3%

Note: Numbers add to greater than 100 percent due to multiple response. n=78.

Source: Root Policy Research from the 2020 OHCS Housing Stakeholder Survey.

Reasons for housing outcome prioritization. Stakeholders shared their reasoning for choosing the housing outcomes they prioritized most highly. In addition to adding to the affordable housing stock and shelter capacity to address urgent needs, stakeholders raised issues specific to their experience in rural Oregon. This range from the limited ability of smaller communities to issue bonds for projects, relying on volunteers to staff emergency shelters, lack of local capacity for mental health and substance use disorder treatment, poor condition of housing, and a need for more homeless resources to be disbursed outside of Oregon’s major population centers based on local poverty rates.

- *“In our service area, the lack of affordable rental housing compounds and exacerbates other housing needs. Rural communities and localities cannot issue bonds to support affordable housing. State money should then be targeted in places who cannot use bonds or other measures to meaningfully participate in housing creation.” (Stakeholder survey respondent)*
- *“As I mentioned before, many times people are given a Section 8 voucher but ends up expiring due to the lack of affordable housing in this area. Also, one of the shelters near has staff who are only volunteers, there are no funds allocated to specifically hire anyone to run the shelter therefore homeless do not know if they will have a place to sleep.” (Stakeholder survey respondent)*
- *“Homeless in our community do not have many options, we live in a small community with few resources to help those with mental health/addiction issue remain stable, and the housing stock is older.” (Stakeholder survey respondent)*
- *“No shelters or transitional housing in our rural area.” (Stakeholder survey respondent)*
- *“In our communities, we have a large number of people who are unsheltered, as well as many people who have lost their homes due to wildfires. Many of our low-income residents who are not homeless live in inadequate housing, particularly in rural areas. They need funds for furniture/appliances, mold removal, heating/air conditioning, internet access and many other needs.” (Stakeholder survey respondent)*
- *“The supply of affordable housing is our greatest need. In Southern Oregon, we would benefit greatly from a more equitable distribution of HUD housing resources. Additionally, we need expanded shelter beds to house those who are currently experiencing homelessness. We also need a larger supply of vouchers.” (Stakeholder survey respondent)*
- *“If there is more affordable housing, fewer people will stay outside. I think there is homelessness across the state that looks different than the urban areas and it is overlooked, so would like to see it distributed across the state equitably based on poverty indices and local economy.” (Stakeholder survey respondent)*

Recommendations to increase effectiveness of housing programs.

In addition to increasing the supply of affordable housing, stakeholders made suggestions specific to building capacity and addressing housing needs in rural Oregon, OHCS programming and operations, and focusing on equity and reducing disparities.

Building capacity and addressing housing needs in the balance of state.

- *“Grant writing assistance to rural Oregon.” (Stakeholder survey respondent)*
- *“Local builders need to be able to navigate process of building affordable homes.” (Disability focus group participant)*

- *“More targeted resources to addressing issues in rural communities, with a focus on how current programs and resources work and do not work in concert with each other.” (Stakeholder survey respondent)*
- *“Increase funding, work with local jurisdictions to decrease barriers to constructing affordable housing.” (Stakeholder survey respondent)*
- *“Encourage renovation of rural aging assets—not just those whose subsidies are immediately threatened.” (Stakeholder survey respondent)*
- *“The Gorge has a crisis this fall with no emergency shelters able to open due to COVID restrictions and space. CRISIS.” (Stakeholder survey respondent)*
- *“If building anything out here right now, it is very, very difficult to find contractors to do the work who have the capacity to take on the project. There are tradespeople, but not the general contractor/construction manager locally. It can take time if have all needed because it talks.” (Central/South Central/Southeast Oregon roundtable discussion participant)*

OHCS programs and operations.

- *“The State should come and visit the small communities in the State to see first hand. Too many times the support and money goes to bigger cities. Its like our smaller communities do not matter.” (Stakeholder survey respondent)*
- *“Stronger coordination between OHCS programs and with resources at other state agencies.” (Stakeholder survey respondent)*
- *“More resources, outcome based contracting + flexibility in administration of funds.” (Stakeholder survey respondent)*
- *“Make it easier for small non-profits and alternative housing programs to apply for funding.” (Stakeholder survey respondent)*
- *“Availability of staff ready to quickly assist.” (Stakeholder survey respondent)*
- *“Focus more on long-term assistance and construction of new housing, and less on emergency assistance.” (Stakeholder survey respondent)*
- *“Allow non CAA and COC organizations to access funds directly. Incentive communities who do collaborate. Make it a mandatory part of receiving funds.” (Stakeholder survey respondent)*
- *“Have greater clarity between Fiscal side of OHCS and Program side, utilize expertise in the field, as turnover in agency has caused disconnects in communication and not established*

relationship (this is a consequence across landscape due to COVID and no unique to any one entity).” (Stakeholder survey respondent)

Equity and reducing disparities.

- *“Having a team in communities and having relationship building—it changes willingness to report housing discrimination, and so much better than telling them to call an 800 number. Having people work in rural communities—really builds relationships and educates landlords to help landlords not discriminate. The messaging in trainings is an agency that wants to educate and advocate for speedy resolutions. The harder part is when they find the landlords who just don’t care ‘cowboys’—and they are there in rural areas.” (Fair housing stakeholder focus group participant)*
- *“The state walked away from its responsibility from enforcing by becoming not substantially equivalent in 2015. The state needs to become equivalent and invest in the systems for enforcement on the public and private side. If we had more funding, we could really do the enforcement. For a private fair housing organization, it really does come down to resources.” (Fair housing stakeholder focus group participant)*
- *“In addition, equitable/anti-racist service provision by CAP agencies & NGOs in the housing arena to stable, dedicated capital to build in cities and locations that remain ill- and underserved by the market.” (Stakeholder survey respondent)*
- *“Get down to the grass roots level and understand the barriers that people with disabilities face when looking for housing.” (Stakeholder survey respondent)*
- *“Allow for flexibility of how funds are used. Look to culturally specific community based organizations to provide housing resources in ways that meet their needs. More legislation needed to make affordable housing more accessible (rent affordability, discrimination, slum lords, denial of units based on past history, etc.). More long term rent subsidies needed.” (Stakeholder survey respondent)*
- *“Housing First and increase valuation of providers who have significant lived experience while supporting providers with ongoing cultural competency trainings. I have also seen far too examples of failures simply because of providers’ biases. Assuring providers have in-depth cultural awareness of communities they’re serving would increase cost-effectiveness.” (Stakeholder survey respondent)*

Impact of recommendations on priority housing outcomes. Were OCHS, partner agencies, and the legislature to implement the recommendations suggested, stakeholders believe the changes would result in increased efficiency and effectiveness of subgrantees, that access to housing and services will increase and disparities will be reduced, vulnerable populations will experience improved health and

housing stability, and the supply and condition of affordable housing statewide will increase.

Increased efficiency and effectiveness.

- *“Those changes would allow housing/service providers to spend more resources on actually providing the housing/services and less on excessive reporting.” (Stakeholder survey respondent)*
- *“Clatsop County has the highest rate of homelessness in the state yet cannot compete effectively for resources.” (Stakeholder survey respondent)*
- *“Ideally this would decrease administrative burden for grantees/subgrantees and make it easier for Oregonians to access resources.” (Stakeholder survey respondent)*
- *“Fiscal and Program working more harmoniously and with clearer directives in unison will streamline service delivery on sub-recipient end.” (Stakeholder survey respondent)*

Increasing access and reducing disparities.

- *“The programs and resources currently available in rural communities would be used much more efficiently, and allow for community members experiencing intersectional discrimination to more successfully access the housing supports they need.” (Stakeholder survey respondent)*
- *“People will be able to apply to the programs and get aid with fewer barriers. More vulnerable people and people of color will have access.” (Stakeholder survey respondent)*
- *“Accessible housing can be used by everyone, throughout their lives. Why not create universally accessible housing moving forward?” (Stakeholder survey respondent)*
- *“I want to emphasize we have a high and growing percentage of Hispanic/Latino residents. Hood River is 30 percent. My point is we need the flexibility of serving all of the people. Citizenship issues and the mixed family status ruling is scaring people away. There is a role for the state to stand up and support this important and growing sector of population. Also regions with high numbers of these populations are being disproportionately impacted.” (North Coast roundtable discussion participant)*

Improved health outcomes and longer-term housing stability.

- *“Our program has seen the extreme impacts that just having a safe and secure home does to someone's health, mental health and ability to thrive in a community. It is crucial.” (Stakeholder survey respondent)*
- *“Long-term support enables people with multiple challenges achieve stable housing.” (Stakeholder survey respondent)*

- *“I have had several clients with barriers and once they navigate their barriers such paying old bills, attending second chance classes etc., their (voucher) search time has timed out and they have to re-apply and repeat the entire process. Often times when this happens I see clients who no longer want to take meds and or relapse causing additional barriers which would have been less likely to happen if clients had the housing needed to provide the self-efficacy necessary to maintain sobriety, recovery and or mental health and medical care engagement.” (Stakeholder survey respondent)*

Increasing the supply and condition of affordable housing.

- *“If we had sufficient units of affordable housing across the spectrum, we would have fewer families experiencing housing instability. Having a stable home provides the basis for improved outcomes in all other areas of life, including health, education, and career.” (Stakeholder survey respondent)*
- *“Increase housing inventory—if Jackson County had more housing units, the social service network already in place could assist those in the housing units with support services and help them to maintain their safe and affordable housing.” (Stakeholder survey respondent)*
- *“Increase the housing supply for smaller households. Most projects cost upwards of \$250k/unit. Alternative groups like SquareOne Villages have shown that quality housing can be produced for under \$100k/unit. We can get better bang for the buck by replicating such models.” (Stakeholder survey respondent)*
- *“Prolong quality of affordable assets long term—encourage retention of same assets within affordable inventory.” (Stakeholder survey respondent)*

Priority community development outcomes. The five community development outcomes considered a priority by the greatest proportion of Business Oregon stakeholders are:

- Higher quality and affordable childcare centers;
- Digital/broadband is available to residents regardless of their geographic location;
- Economic growth/positive economic impact;
- Increase in local jobs; and
- Increase in local businesses.

From the perspective of stakeholders, these outcomes are achieved by investing in the urgent community development needs previously discussed. In addition to specific outcomes, like higher quality and affordable childcare centers and broadband access, the outcomes stakeholders desire represent positive economic outcomes that will result in

more vibrant and sustainable communities—economic growth, more local jobs, increased local business, and neighborhood or community revitalization. Roundtable discussion participants and survey respondents both identified addressing infrastructure needs as essential prerequisites to housing and economic development efforts. Stakeholders serving veterans would like to develop “one-stop” centers for veterans to transition veterans from service back into civilian life; a place where veterans can go get all of their resources lined up to help them get on their feet. In their experience, veterans are not often aware of all that they are eligible for.

Figure A-17.
If you could pick five priority community development outcomes from investment of HUD CDBG block grant funds within Oregon, what would those be?

Community Development Outcome	% of Responses
Higher quality and affordable childcare centers	57%
Digital/broadband is available to residents regardless of their geographic location	51%
Economic growth/positive economic impact	49%
Increase in local jobs	47%
Increase in local businesses	38%
Lower water and sewer fees paid by residents	36%
Catalyst for neighborhood or commercial district revitalization	32%
Additional mental health care facilities	32%
A revitalized, attractive, Main Street	30%
Quality community centers	25%
Improved emergency services (e.g., fire stations, fire trucks, emergency equipment)	15%
More trainings and technical assistance for local businesses	13%
Streets and sidewalks are more accessible to persons with disabilities	13%
Better access to job training programs	11%
More trainings and technical assistance to area nonprofits	11%
Additional general health care facilities	9%
Additional opioid rehabilitation centers	9%
Options/expansion of “telemedicine”—online medical assistance/video chats	8%
Higher quality library	2%

Note: Numbers add to greater than 100 percent due to multiple response. n=53.

Source: Root Policy Research from the 2020 Business Oregon Community Development Stakeholder Survey.

Recommendations to increase impact of CDBG program. To increase the impact and effectiveness of the CDBG program, stakeholders advise Business Oregon

to increase technical assistance and reduce administrative burdens for small communities and to make changes to program requirements to increase the financial feasibility of participating in CDBG and to allow local organizations to apply for funds to address critical local needs that may not align with state priorities.

Increase technical assistance and reduce administrative burdens for rural communities.

- *“Grant writing training for those communities so they feel more comfortable applying for Business Oregon grants. More regional housing rehabilitation funding for smaller rural communities.” (Stakeholder survey respondent)*
- *“Currently, our non-entitlement areas are afraid of the CDBG process and hesitant to try.” (Stakeholder survey respondent)*
- *“Add a category for providing technical assistance and allocate somewhere around \$1-3M/year for this.” (Stakeholder survey respondent)*
- *“Provide technical assistance and possible start-up funding for housing development, especially Southern Morrow County.” (Stakeholder survey respondent)*
- *“Make the program easier to use. There are so many rules and so much red tape, most small communities cannot undertake them.” (Stakeholder survey respondent)*
- *“CDBG funds are very complex with respect to determining eligibility and applicable projects. Many rural places don't have the resources to either apply for or administer these grants. Support from Business Oregon's RDO staff and others is essential to ensure communities are ready to apply for these funds when they become available.” (Stakeholder survey respondent)*
- *“Nonprofits don't have an army of people to do paperwork. What limits participation is the lack of skill and expertise to handle the paperwork.” (Willamette Valley roundtable discussion participant)*

Changes to program requirements and maximum grant amounts.

- *“Lower the share allocation for cities with no tax base or allow the cities to create a tax base.” (Stakeholder survey respondent)*
- *“Provide fewer restrictions on grants to businesses. Restricting small businesses from getting CDBG grants because they applied to the EIDL grants (after they were told to apply for these grants) doesn't make any sense. You are leaving out the businesses that need help the most. Those who didn't apply to the EIDL grants obviously didn't have as big of a need. Provide more funding to service organizations that have expertise in those areas.” (Stakeholder survey respondent)*

- *“Shift the focus from public facilities & microenterprise to basic needs, childcare, and infrastructure that will benefit affordable housing. Create a housing program that involves both rehab and infrastructure. Fund rent assistance.” (Stakeholder survey respondent)*
- *“More funding for Public Works Infrastructure. Sewer, water and stormwater is costly to install and maintain and with a smaller community the rates have to be high to keep it up which is hard on folks especially in distressed income areas. Additional grant funding to do larger projects would help keep costs down so we can stay away from debt.” (Stakeholder survey respondent)*
- *“A year or so ago, we applied for a grant for sidewalks on the road next to the elementary school. Kids walk down that road, and do not stay to the sides. It is dangerous. We were told that since there had never been a fatality there, we would not be given grant funds. Listen to the community. Community leaders know what is needed.” (Stakeholder survey respondent)*

Allocation of funds. When asked if the current allocation of funds across community development programs meet the needs of their region, more than half of stakeholders responded, “don’t know”. Several stakeholders shared their perspective on how to rebalance the allocation of funds to better meet needs in their region. Increasing the share of funds dedicated to microenterprise was the most common suggestion. Others suggested linking infrastructure project awards to housing development.

- *“Microenterprise is too low. Missing TA funds. Public Facilities should be higher.” (Stakeholder survey respondent)*
- *“Too much on housing and facilities. More needed on Public Works (infrastructure) as this is the foundation to get to any of the other items. Infrastructure required to do housing or facilities.” (Stakeholder survey respondent)*
- *“I would increase the amount available for microenterprise assistance to 3% and broaden the types of services that could be provided to microenterprises.” (Stakeholder survey respondent)*
- *“Shift the focus from public facilities & microenterprise to basic needs, childcare, and infrastructure that will benefit affordable housing. Create a housing program that involves both rehab and infrastructure. Fund rent assistance.” (Stakeholder survey respondent)*
- *“RDI has difficulty explaining the eligibility and application process for this funding; we attended the training class, but still did not feel comfortable as a resource. We typically refer communities to their RDOs.” (Stakeholder survey respondent)*
- *“Slightly more funding for microenterprise assistance, unless there's another funding source that can meet this need.” (Stakeholder survey respondent)*

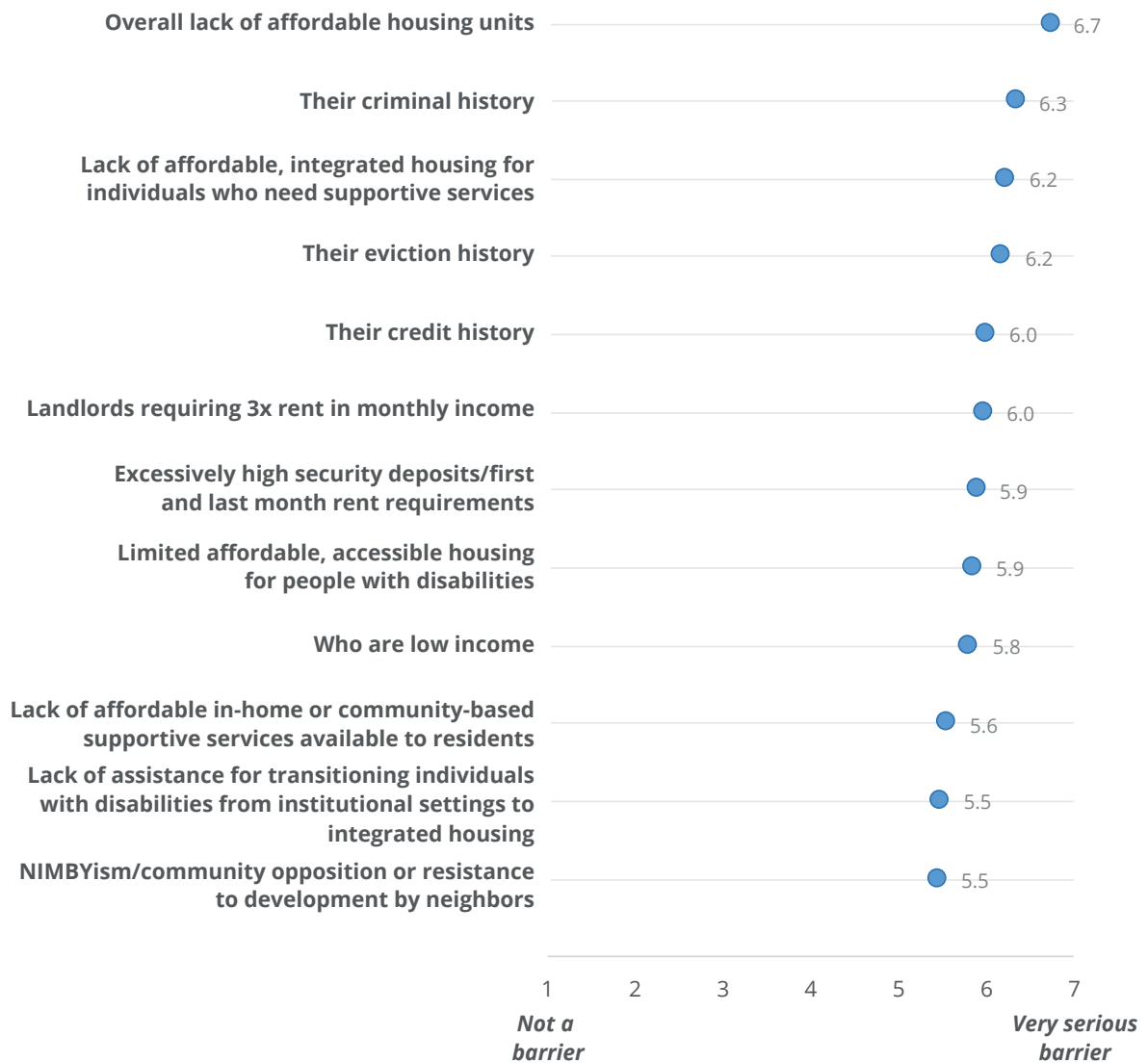
- *“More funding for housing rehabilitation—keep allowing grants.” (Stakeholder survey respondent)*

Fair Housing

Respondents to the OHCS Stakeholder Survey assessed the degree of seriousness of 56 potential barriers to housing choice in their area. Types of barriers include impediments include housing availability, housing practices and programs, discrimination against certain populations, local regulations and policy, state regulations and policy, and access to areas of opportunity.

Most serious barriers to housing choice. From the perspective of stakeholders, the most serious barriers to housing choice in Oregon’s non-entitlement areas include a lack of affordable housing; the criminal, rental, and credit histories of prospective tenants; and the lack of affordable, integrated housing for individuals who need supportive services. The top 12 most serious barriers to housing choice are presented in Figure A-18.

Figure A-18.
Top 12 Most Serious Barriers to Housing Choice



Note: Rated on a scale from 1 to 7, where 1=Not a Barrier and 7=Very serious Barrier. Top 12 barriers have ratings of 5.5 or greater. n=72.

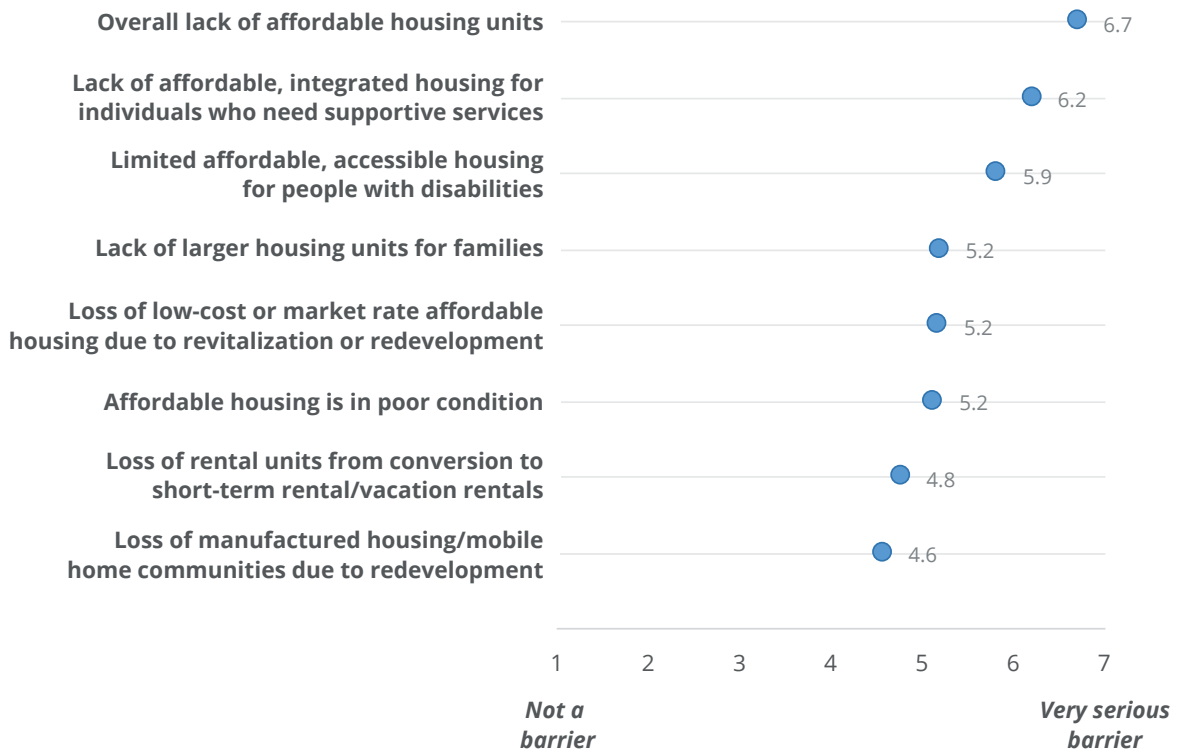
Source: Root Policy Research from the 2020 OHCS Housing Stakeholder Survey.

The overall lack of affordable housing was the greatest housing need discussed by resident and stakeholder focus group participants across the state; many participants described the housing shortage and resulting homelessness, overcrowding, and people living in substandard housing as disproportionately impacting members of protected classes, especially persons of Hispanic descent, immigrants, and persons with disabilities.

- *“Need some kind of housing options for folks who are on SSI. When rent is \$1,300 and they’re getting \$870 in SSI, there are no options.” (Community Advisory Group focus group participant)*

Housing availability. Among the eight potential barriers to housing choice related to housing availability, stakeholders considered the overall lack of affordable housing units; lack of affordable, integrated housing for individuals who need supportive services; and the limited affordable, accessible housing for people with disabilities to be the most serious barriers to housing choice. Conversion of rentals to short-term or vacation rentals and the loss of manufactured housing/mobile home communities to development were considered relatively less serious barriers.

Figure A-19.
Seriousness of Potential Housing Choice Barriers Locally—Housing Availability Factors



Note: Rated on a scale from 1 to 7, where 1=Not a Barrier and 7=Very serious Barrier. n=72.

Source: Root Policy Research from the 2020 OHCS Housing Stakeholder Survey.

Recommended actions to address housing availability barriers. With respect to barriers to housing choice resulting from a lack of available housing, stakeholders’ recommendations encouraged universal design and dedicating units for persons with SPMI and SUDs and a number of strategies to create and preserve affordable housing.

Actions to increase availability of housing and services affordable and accessible to people with disabilities.

- *“Support universal design to make all units accessible.” (Stakeholder survey respondent)*
- *“Increase housing stock with units set aside for individuals with SPMI and SUD disabilities.” (Stakeholder survey respondent)*
- *“Buy properties available or build for the population of people with disabilities other than just the HIV population.” (Stakeholder survey respondent)*

Actions to increase the supply of affordable housing.

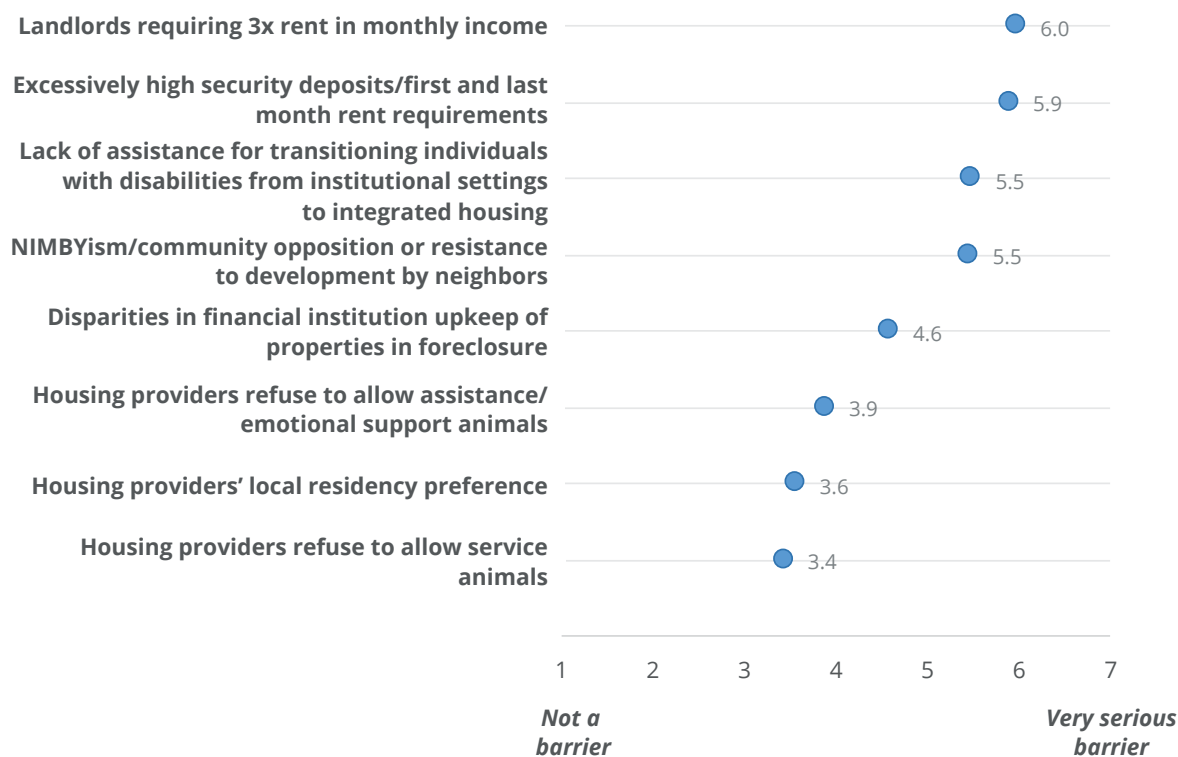
- *“Call State of Emergency for areas that have not developed in over 10 years and require communities to demonstrate resolve or lose access to funding.” (Stakeholder survey respondent)*
- *“Prioritize funding smaller sized units in rural communities. Allow greater flexibility in funds for the conversion and adaptive reuse of non-residential properties.” (Stakeholder survey respondent)*
- *“Help fund the cities of Talent and Phoenix to purchase lands that either were or could be affordable housing as part of a land bank or land trust.” (Stakeholder survey respondent)*
- *“Support the development and construction of affordable homes for rent and sale. Find ways to make development of affordable housing more cost effective. Support a statewide tax waiver for the land portion of homes where a nonprofit retains ownership of the land through land-lease or land trust, thereby making the homes permanently affordable and preserving the inventory of affordable homes.” (Stakeholder survey respondent)*
- *“More funds to build more affordable housing in good neighborhoods or build affordable housing on land that has been vacant long-term as well as safe mobile home living and housing.” (Stakeholder survey respondent)*
- *“Keep moving forward with bills like HB2001. Eliminate inclusionary zoning for motor vehicles (minimum parking requirements). Reduce all regulations within UGBs while make it much harder to expand UGBs. It is a worthwhile trade to get rid of some of the environmental protections within a city if it means you will get less environmental degradation in an undeveloped outer area.” (Stakeholder survey respondent)*

Actions to limit conversion of rental units to vacation/AirBnB/

- *“Provide tools/examples to help cities avoid conversion to short term/vacation rentals.” (Stakeholder survey respondent)*
- *“Advocate with local governments to put limits on vacation rentals in tourist communities.” (Stakeholder survey respondent)*

Housing practices and programs. With respect to housing practices and policies, the most serious barriers include the landlord practice of requiring prospective tenants to have income at least three times the rent and excessively high security deposits or first and last month rent requirements. Stakeholders also consider a lack of resources to transition individuals with disabilities from institutional to integrated settings and NIMBYism/community opposition or resistance to development to be relatively serious barriers to housing choice.

Figure A-20.
Seriousness of Potential Housing Choice Barriers Locally—Housing Practices and Policies



Note: Rated on a scale from 1 to 7, where 1=Not a Barrier and 7=Very serious Barrier. n=69.

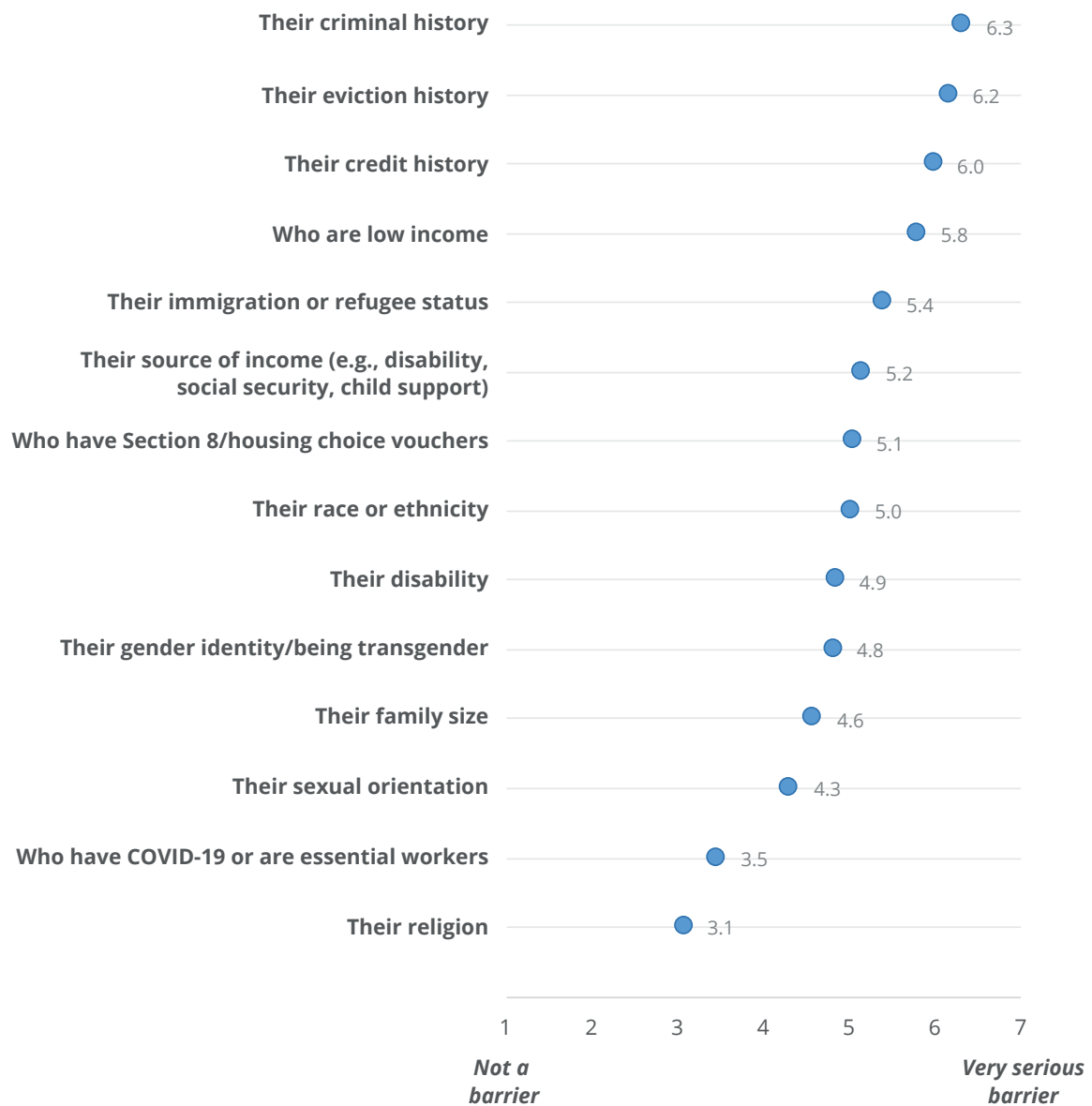
Source: Root Policy Research from the 2020 OHCS Housing Stakeholder Survey.

Recommended actions to address barriers from housing policies and practices. With respect to barriers to housing choice resulting from the practices and policies of housing providers, stakeholders recommended a number of actions ranging from adopting state policies to mitigate tenant screening criteria that disparately impact members of protected classes to expanding the pool of housing vouchers for people whose source of income is SSI or SSDI to increasing the number of affordable housing units.

- *“Statewide ordinance that limits screening criteria that have disparate impacts for people in protected classes.” (Stakeholder survey respondent)*
- *“Support mission based housing providers committed to providing low barrier, affordable housing.” (Stakeholder survey respondent)*
- *“People on SSI or SSD should get an automatic housing voucher is their income is below 60% AMI (and almost all are). How is that we determine that someone has a disability which keeps them from working but then we do not give them sufficient resources for their housing???” (Stakeholder survey respondent)*
- *“If more housing is built, it will cease to be a 'landlord market'.” (Stakeholder survey respondent)*
- *“New and more affordable regulations for deposits and rents.” (Stakeholder survey respondent)*

Discrimination against certain populations. Figure A-21 presents stakeholders’ assessment of the degree to which discrimination against certain populations is a serious barrier to housing choice in their area. As shown, criminal history, eviction history, credit history, and low income, are factors which pose the most serious impediment to housing choice based on housing providers’ discernment. With the exception of religion, discrimination against people belonging to classes protected under state and federal fair housing law—national origin, race, disability, gender identity, family size, and sexual orientation—are, on average, considered somewhat serious barriers, with religion being not at all a factor. A history of COVID exposure or increased likelihood of COVID exposure based on employment as an essential worker is also not considered a serious barrier to housing choice.

Figure A-21.
Seriousness of Potential Housing Choice Barriers Locally—Discrimination
Against Certain Populations



Note: Rated on a scale from 1 to 7, where 1=Not a Barrier and 7=Very serious Barrier. n=67.

Source: Root Policy Research from the 2020 OHCS Housing Stakeholder Survey.

Source of income. In stakeholder focus groups, participants report that source of income protections in the balance of state are not effective. The likelihood of enforcement and fines are too low to change landlord behavior of refusing to rent to voucher program participants. Some are rejecting housing program funds provided as part of COVID relief. Organizations serving veterans in Malheur, Lake, and Coos counties described housing providers setting rents above VASH voucher limits, and some surmised rents were set

deliberately above program limits so that housing providers would not have to accept voucher program tenants.

- *“Many deaf people have a hard time getting housing. People do not want to take time to relay service. It is frustrating and hard. People are scared to rent to those who are deaf and have Section 8.” (Disability focus group participant)*
- *“With HUD VASH people who are renting drive the cost too high—cost is \$1,200 but VASH only covers \$500; they do this so that Vets or any homeless person cannot rent it. Landlords can drive costs high and still find people, but it would never be accessible on VASH.” (Veterans focus group participant)*
- *“Source of income is a big issue—it’s really crucial across the state and feeds into multiple protected classes. We are seeing landlords are more comfortable being explicitly discriminatory, advertising, ‘no Section 8’ or ‘not suitable for HUD habitability rules.’” (Fair housing stakeholder focus group participant)*
- *“There are a lot of landlords [in Eastern Oregon] who will not take Section 8 or agency housing subsidies, for many different reasons—they don’t want to work for HUD, or have a negative stigma of people with vouchers, the paperwork, or they don’t get paid in a timely fashion.” (Fair housing stakeholder focus group participant)*
- *“I was homeless with my son after leaving DV situation. I moved to Roseburg and went to the VA for help, and I got a VASH voucher—I had a baby and did not want to live in car. People do not want to rent to those with vouchers...There are always new ways to say no to homeless people and vets looking for help. I had no rental history because I had been a homeowner. It was so hard, after I had moved out and had my own place the landlord told me the difficulty of finding something on a voucher is due to the stigma—people do not pay their portion, do not take care of it, do not pay for repairs.” (Veterans focus group participant)*

The state-administered insurance fund available to housing providers whose property is damaged by tenants covered by source of income protections is not considered an effective and efficient remedy. The program is seen as administratively cumbersome, requires landlords to go through court processes, and is capped at an amount too low to justify the time and effort necessary to obtain relief funds. Landlords also requested guidance from the state or other organizations for how to properly screen applicants who are undocumented.

- *“Landlord protection funds are key if we’re going to ask people to take care of them. I know the state has a fund, they found it to be less than easily acceptable.” (Community Advisory Group focus group participant)*

- *“Landlords have tried the insurance program—it’s paperwork intensive, have to go through the court process first before they can get anything. When they do get money, the limit is low. So, it doesn’t add up with making any financial sense, so the landlord says, ‘I’m not going to take a chance on Joe.’” (Community Advisory Group focus group participant)*
- *“I’d like more guidance on screening/denying undocumented persons—every time I get one of those as applicants, I have to go to an attorney. No one has given us a tool to use to screen a person with no documents without having to call my lawyer. No one has suggested a screening policy tool for us to use. There has to be some way for us to screen.” (Community Advisory Group focus group participant)*

Northeast Oregon Housing Authority (NEOHA)’s Rent Well and Housing Navigator programs may be a more effective model for incentivizing landlords to rent to high barrier applicants with housing vouchers. It includes a single point of contact, a local insurance fund, and inspections by the program before and after tenancy.

- *“NEOHA has a Rent Well program and a housing navigator program. Both have money for LL and have worked on designing tenant specific contracts through coaching etc so that they agree that if they go down this path, these are the repercussions. It seems to have worked really, really well. Have had some high barrier tenants, and the LL like the security blanket, with a single point of contact (navigator) and it’s handled in-house. And, there is a LL fund and we check the unit before and after. And it makes a big difference, and it’s been working really well.” (community Advisory Group focus group participant)*

Immigration status. In interviews with immigrant community leaders in southern and eastern Oregon and stakeholder focus groups, participants described the difficulty immigrants who are undocumented experience when trying to rent a home. For residents who are undocumented, it is very hard to find housing providers willing to forgo standard background and credit check processes—which require a Social Security Number; in the experience of local stakeholders, “none” of the larger property management companies are willing to accommodate alternative methods of assessing credit worthiness and criminal history. In many cases, landlords willing to rent to these households are considered “slumlords” and their properties are truly the housing of last resort in a community.

- *“The immigrant community faces different challenges than others. The lack of a valid social security number means they cannot create a credit history, and many don’t have a rental history. So, they rent under someone else’s name or partner with family to rent and apartment or a house.” (Central Oregon stakeholder interview participant)*
- *“Housing providers will rent to undocumented and will not repair that unit OR there is a whole building that only rents to undocumented and they charge per person for rent and make tons of money off of them.” (Fair housing stakeholder focus group participant)*

- *“We work closely with Oregon Law Center for housing, often they say OR housing law does not require for tenants to provide a SSN, but ALL of the property management companies will not proceed without a SSN. It’s very hard for a client to come forward with a SSN. The property management never tells them in writing that they are denied for SSN. But, verbally they say it’s because of SSN. In writing they say it’s credit, or incomplete application.” (Central Oregon stakeholder interview participant)*
- *“In Oregon, state law does not allow immigrants to be issued a state ID, which is another barrier. And they cannot identify themselves. Many property management companies only accept state issued IDs.” (Central Oregon stakeholder interview participant)*

For residents who are undocumented, especially in very small communities with few other immigrant families, fear of being identified as undocumented is real, and prevents immigrant households from reporting poor conditions or discriminatory treatment.

- *“Central Oregon is not a diverse community, and immigrants do not want to be identified as undocumented—it’s a really small community. What if the teacher of my kids knows or my employer knows? If I put myself out there or my landlord knows, when I used my fake social security number?” (Latino community stakeholder interview participant)*
- *“Some families have a fear of deportation. Even with visas, there is real fear under the current Federal administration. They hear stories of friends going to report to the consulate and being deported and so I tell them to take their families with them when they go so that they won’t be separated.” (Latino community stakeholder interview participant)*
- *“What we see is that people who are undocumented are afraid to stand up for their housing rights.” (Fair housing stakeholder focus group participant)*

Immigrants and refugees. A lack of rental history in the U.S. or credit history is a barrier to housing choice experienced by immigrant and refugee households seeking housing in Oregon’s balance of state. In interviews and focus groups, participants described immigrant and refugee households being limited to renting substandard housing by landlords who do not require background or credit checks.

- *“Immigrant and refugee groups; refugee status is not considered a protected class—they don’t have rental history, don’t have credit history, and so housing providers will not rent to them. So, they end up living in substandard housing and end up with slumlords, which is the only place they can live to build up rental housing history.” (Fair housing stakeholder focus group participant)*

Language access. Language access and a preference for verbal communication creates additional challenges between immigrant tenants and housing providers, including misunderstandings of policies and failure to properly request repairs.

- *“Absolutely seeing situations, when partnering with family and the family is not on the contract, they get evicted, or get letters that they could be evicted.” (Latino community stakeholder interview participant)*
- *“Quite often, immigrants live in poor conditions, especially some property management require a written note to request repairs, but not all clients choose to write a letter or know how to write a letter in English, because they can’t fill out a form and the issue keeps going and going.” (Latino community stakeholder interview participant)*
- *“Or, they like to communicate verbally, but the policy is by letter or form. Tenants may think they notified because they called, the landlord. And some don’t request at all, because of the worry of losing the place.” (Latino community stakeholder interview participant)*

Race. In focus groups and interviews, participants discussed their view that discrimination on the basis of race is underreported in Oregon and nationally. Participants attribute the lack of reporting to several factors, including reluctance to report or file complaints and low awareness of or trust in organizations that file complaints. Fair housing stakeholders described their efforts to partner with organizations trusted by communities of color to build relationships to increase trust and reporting.

- *“Over the summer we saw a rise in hate and harassment based inquiries; some tied to politics, BLM, etc. but also saw more increase in people wanting to speak out more.” (Fair housing stakeholder focus group participant)*
- *“While we see reporting that is 50 percent or more on the basis of disability, race/national origin are likely much higher. FHCO has developed partnerships with the Urban League of Portland, for example, to source complaints. We see more allegations on the basis of race when partnering with culturally specific organizations.” (Fair housing stakeholder focus group participant)*
- *“I have an example about race and fair housing. In Ashland’s ZIP code the life expectancy is very high; if you live in the West Medford ZIP code life expectancy is 30 years less. Ashland has very small black population, and there are essentially no places in Ashland to find housing with a voucher. A young friend of mine who is Black and had a voucher, looked for three months in Ashland and found nothing. Finally, he found something after another three months in West Medford. Ashland sent a Black person to live in a place where they will live 30 less years.” (Disability focus group participant)*

Recommended actions to address barriers from discrimination for certain populations. With respect to barriers to housing choice resulting from discrimination, stakeholders recommended a number of policies to reduce barriers based on a prospective tenant’s personal history, to increase education and enforcement of civil rights laws, and to increase the supply of affordable housing.

Actions to address discrimination against people based on their criminal, eviction, or credit history.

- *“Limit screening criteria affordable housing providers can use.” (Stakeholder survey respondent)*
- *“Unless for charged and convicted for specific offences, the State should no longer permit owners to ask about criminal history.” (Stakeholder survey respondent)*
- *“Work more cooperatively with owners facing challenges with tenants who have such histories/issues.” (Stakeholder survey respondent)*
- *“Provide some insurance for landlords if they rent to a person with a criminal background.” (Stakeholder survey respondent)*

Actions to address discrimination against people based on their race, ethnicity, national origin, disability, gender, familial status.

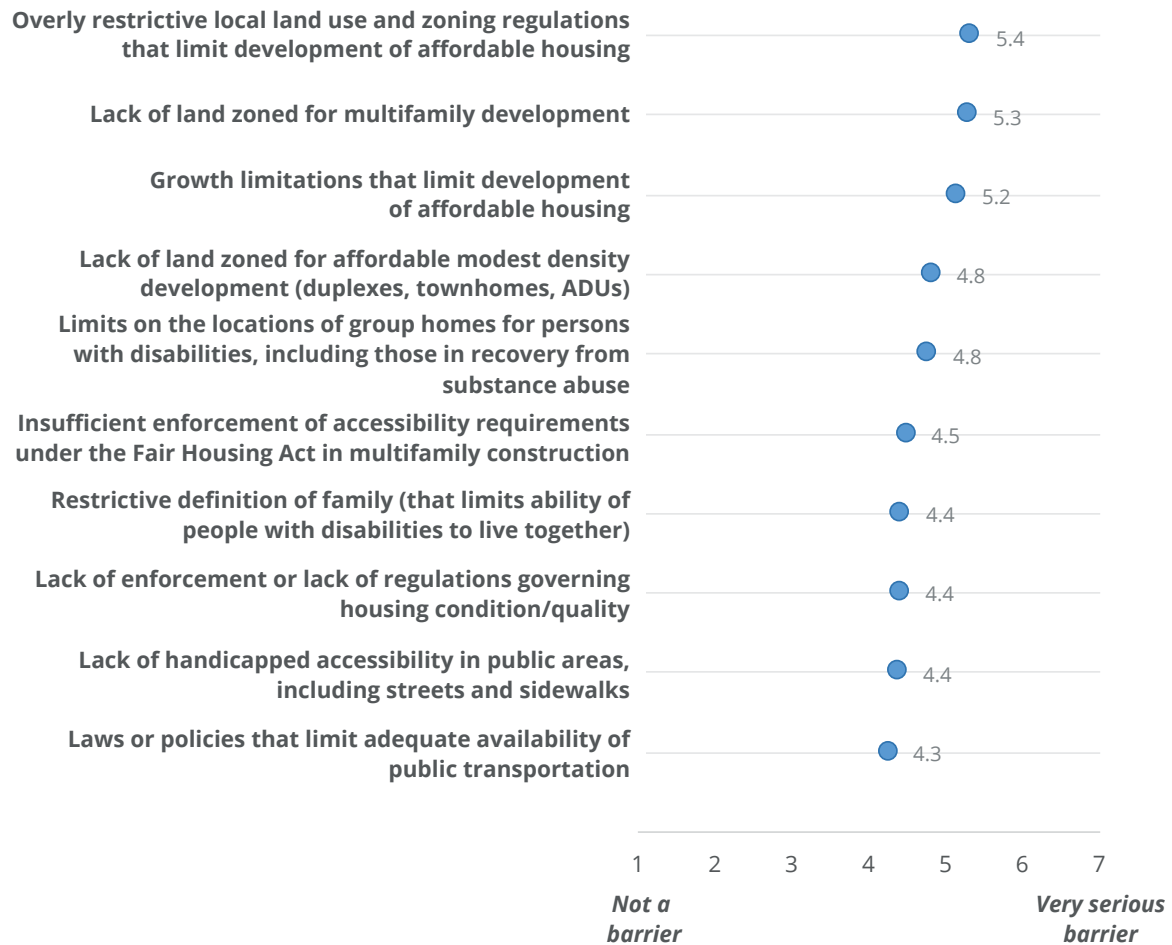
- *“Have the application process be a unified one site process that can be monitored. Our CHWs (Community Health Workers) who advocate for their clients with landlords see a lot of discrimination based on race, and very much based on credit and criminal history.” (Stakeholder survey respondent)*
- *“Enforce laws; expand education.” (Stakeholder survey respondent)*
- *“Need transitional services to help with overcoming eviction history and getting reasonable accommodation.” (Stakeholder survey respondent)*

Actions to address discrimination on the basis of income or source of income.

- *“Double the size of the Section 8 voucher program.” (Stakeholder survey respondent)*
- *“Build more affordable housing and strengthen penalties for landlords who discriminate.” (Stakeholder survey respondent)*
- *“The biggest way to discriminate against people is based on their income level—yet in most places this is not a protected class. Make income level a protected class and a lot of zoning will become indefensible.” (Stakeholder survey respondent)*

Local regulations and policies. In general, local regulations and policies are not perceived to be particularly serious barriers to housing choice. Among those evaluated, stakeholders considered overly restrictive local land use and zoning regulations that limit the development of affordable housing, the lack of land zoned for multifamily development, and growth limitations that limit development of affordable housing to be the most serious among these potential barriers.

Figure A-22.
Seriousness of Potential Housing Choice Barriers Locally—Local Regulations and Policy



Note: Rated on a scale from 1 to 7, where 1=Not a Barrier and 7=Very Serious Barrier. n=68.

Source: Root Policy Research from the 2020 OHCS Housing Stakeholder Survey.

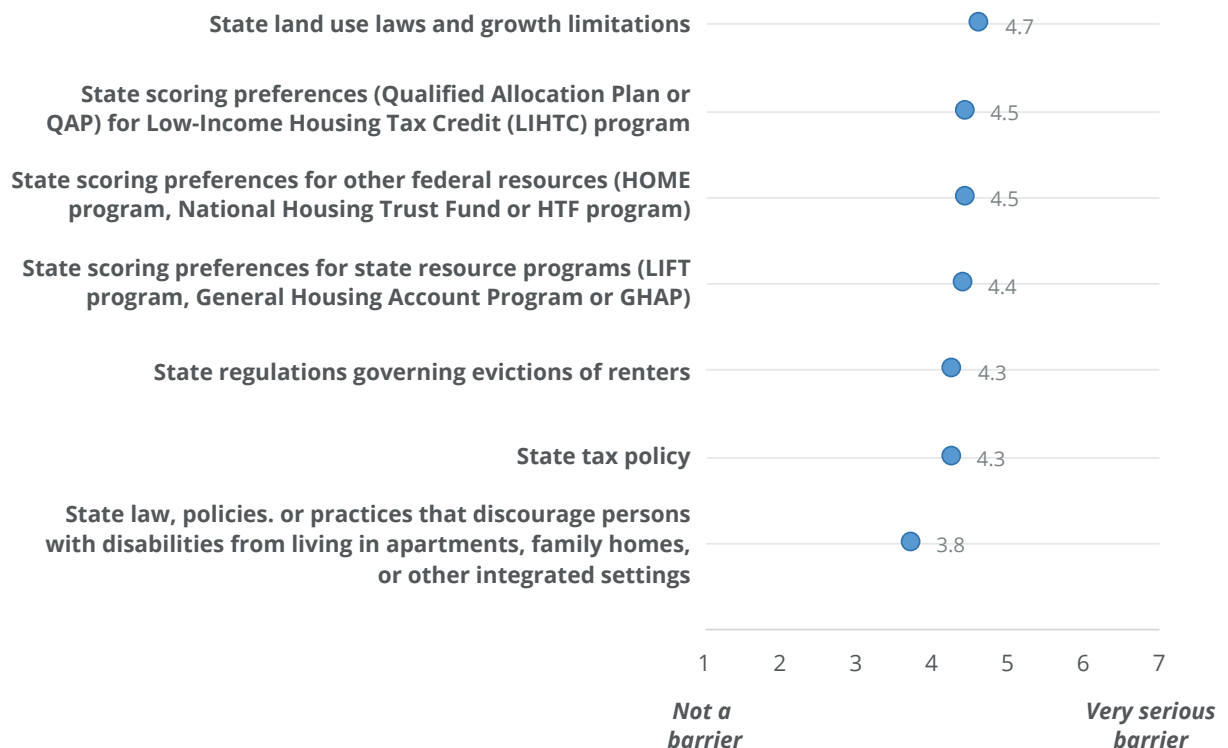
Recommended actions to address barriers from local regulations and policies. With respect to barriers to housing choice resulting from local regulations and policies, three stakeholders made suggestions to address these issues and focused on enforcing current zoning equally and requiring comprehensive plans to include zoning for all types of housing.

- *“Require comprehensive plans to provide zoning for the full range of types of housing. Many old boarding houses have been converted to single family homes.” (Stakeholder survey respondent)*

- *“Force counties and cities to enforce the laws presently on the books, which is at this time done subjectively and punitively. If an ‘upstanding business owner’ complains, there is action even if the complaint is punitive.” (Stakeholder survey respondent)*
- *“Remove the part of enacting legislation that allows zoning codes to be based on morals/character or any nonsense like that. A setback has nothing to with public health, welfare, or safety (building codes will handle the ones that do). ‘Light and air’ is similarly nonsense—no one in a town of 60,000 is going to build ten 50 story skyscrapers that block out the sun.” (Stakeholder survey respondent)*

State regulations and policies. Among state policies, stakeholders consider state land use laws and growth limitations, and state scoring preferences for the Low Income Housing Tax Credit (LIHTC) program, HOME, National Housing Trust Fund, and the LIFT and General Housing Account Program, to be modest barriers to housing barriers to housing choice.

Figure A-23.
Seriousness of Potential Housing Choice Barriers Locally—State Regulations and Policy



Note: Rated on a scale from 1 to 7, where 1=Not a Barrier and 7=Very serious Barrier. n=67.

Source: Root Policy Research from the 2020 OHCS Housing Stakeholder Survey.

Recommended actions to address barriers from state regulations and policies. With respect to barriers to housing choice resulting from state regulations and policies, several stakeholders made recommendations related to state tax policy, Urban Growth Boundary (UGB) regulations, landlord/tenant policies, and other land use policy.

- *“The state tax policy has influenced high tax rates in some areas of the county, making it difficult to sell homes to low-income families in a sustainable fashion.” (Stakeholder survey respondent)*
- *“Re-examine the usefulness of UGB, whether it serves current day and besides the cherished greenery, what are the unintended consequences and how do we collectively address them? There is a price to pay for living in 'paradise'.” (Stakeholder survey respondent)*
- *“Do away with the minimum acreage requirement for homebuilding outside urban growth boundaries.” (Stakeholder survey respondent)*
- *“Create more balance and incentives for landlords to house the potentially riskier tenants.” (Stakeholder survey respondent)*
- *“I have heard landlords complain that the state regulations make it difficult to manage their properties cost effectively and they will be selling their rental properties over the course of the next few years because it's so difficult.” (Stakeholder survey respondent)*

In focus groups and interviews, several stakeholders shared their perception that many landlords across the state do not know their responsibilities under the Fair Housing Act. Several recommended that the state require a minimum of fair housing education for all housing providers, and that such a requirement should be administered at the local level to allow flexibility in administration.

- *“The people who serve food are more regulated than housing providers. There should be landlord registrations that fund systems for a basic level of knowledge of landlord/tenant and fair housing laws.” (Fair housing stakeholder focus group participant)*
- *“Should be mandated by the state—anyone who provides housing has to have a base level of knowledge about fair housing and landlord/tenant laws—but implemented locally. Providers might say this is the end of the world.” (Fair housing stakeholder focus group participant)*
- *“Resourcing FHCO infinitely won't address the issue of lack of knowledge by small landlords. Have to push from the other side also—state mandated. It has to be local because each community is different and would be too burdensome for the state to administer.” (Fair housing stakeholder focus group participant)*

Access to opportunity. With respect to access to opportunity, a lack of affordable in-home or community-based supportive services available to residents and a lack of public sector revitalization strategies or focus on low income/economically depressed areas are the two barriers to housing choice stakeholders considered to be most serious.

Figure A-24.
Seriousness of Potential Housing Choice Barriers Locally—Access to Opportunity



Note: Rated on a scale from 1 to 7, where 1=Not a Barrier and 7=Very serious Barrier. n=65.

Source: Root Policy Research from the 2020 OHCS Housing Stakeholder Survey.

Access to health care services. In focus groups and interviews, residents of the balance of state described the lack of available services for mental health care and substance use disorder treatment as a critical need. For veterans, finding local health care providers who accept Vets (VA insurance) is an added difficulty. Among immigrant households working in hospitality and other low wage industries in rural Oregon, Oregon Health Plan (OHP) is often the only resource for health insurance.

- *“There is a hotel here that keeps workers at the maximum of the hours of part time so that they do not have to pay benefits. The owner expects them at her beck and call but won’t pay*

them enough for benefits. Their kids are on OHP. If adult qualifies for OHP, they only have emergency care. This is a huge health issue for Latino women—they simply are not getting basic care.” (Latino community stakeholder interview participant)

Veterans. While health care options for veterans have greatly improved under the Mission Act, veterans in rural areas must find providers that are willing to participate in the VA insurance program, which further limits choice in health care provider. Suicide is a significant health threat for veterans, and interview and focus group participants described the difficulty veterans who need mental health care experience accessing proper mental health care.

- *“When it comes to mental health, there just are not providers. The VA clinic here does not have mental health. There is just one provider here that takes Vets (VA insurance) and so me and my abusive ex would be seeing the same person, and so I do not go.” (Veterans focus group participant)*
- *“Mental health treatment, especially in rural areas is very lacking. A vet in crisis cannot be helped by being seen once every three months. The VA is great—and the individuals there are amazing—but unless a vet is suicidal, they cannot provide the mental health resources that are needed. This is a systemic issue.” (Stakeholder interview participant)*
- *“We need women’s health care. There is no female provider that takes Vets (in the South Coast region). I waited 3 months for a mammogram; there is no women’s care in our area at all.” (Veterans focus group participant)*

Recommended actions to address barriers to access to opportunity. With respect to barriers to housing choice resulting from barriers to access to opportunity, those stakeholders who provided recommendations focused on the need to investing in Internet infrastructure, increasing funding for mental health services, and transportation.

- *“Lots of reports of vehicles gathered around public libraries so that children can do their school work on the Wi-Fi.” (Stakeholder survey respondent)*
- *“Provide more funding for mental health services.” (Stakeholder survey respondent)*
- *“Develop the transportation network to the I-5 corridor so the area can develop economically without the traditional dependence on natural resource jobs. This area has the best natural harbor between San Francisco and Seattle.” (Stakeholder survey respondent)*

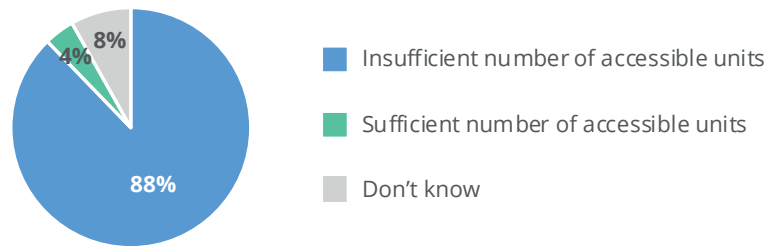
Housing choice for persons with disabilities. As shown in Figure A-25, stakeholders think there are an insufficient number of housing units accessible to persons with disabilities in their service area, as well as an insufficient number of housing units that are visitable by persons with disabilities.

**Figure A-25.
Housing Stock
Accessibility and
Visitability for Persons
with Disabilities**

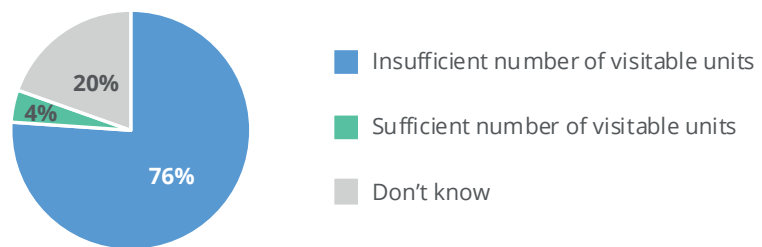
Note:
n=49 and n=46.

Source:
Root Policy Research from the 2020
OHCS Housing Stakeholder Survey.

How would you characterize the availability of housing stock in the area you serve that is **accessible** to persons with disabilities?



How would you characterize the availability of housing stock in the area you serve that is **visitable** to persons with disabilities?

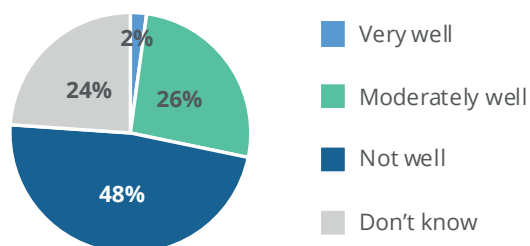


Types of units most needed. Single level units, first floor units, and units with zero step entrances are the most common types of units stakeholders report are most needed in their service area. Making accessibility modifications to existing housing units is also a need. Several respondents described a need for supportive services and peer living options.

- *“For people with physical disabilities it can be hard to find a place that can ensure accessibility—doors, bathrooms. In Rogue Valley there is hardly any housing that will accommodate people with physical disabilities, there is also not a good uniform understanding of what the definition of a disability is.” (Disability focus group participant)*
- *“Single level units, first floor units, units accessible for people with sensory disabilities; small group living with peer support.” (Stakeholder survey respondent)*
- *“Not only is there an ever increasing need for greater affordable supply, much of our current supply is in need of general safety maintenance. Ideally, I would like to see more investments to better support people with disabilities' housing needs and I understand there's significant challenges to doing so.” (Stakeholder survey respondent)*
- *“Zero step entrances, units accessible for people with sensory disabilities; small group living with peer support.” (Stakeholder survey respondent)*

Ability of state and local policies to support living in integrated, independent settings. Overall, nearly half of stakeholders do not think state and local policies and practices support community living and the ability of people with disabilities to live in the most integrated, independent setting they prefer very well. One in four think state and local policies do moderately well in supporting these aims.

Figure A-26.
How well do state and local policies and practices support community living and the ability of people with disabilities to live in the most integrated, independent setting they prefer?



Note:
n=46.

Source:
Root Policy Research from the 2020 OHCS Housing Stakeholder Survey.

Policies working well to support integrated, independent living.

- *“What works well is inclusion, what doesn't work is the availability of housing to ratio income.” (Stakeholder survey respondent)*
- *“ADA requirements of 5 percent of units being accessible gets us part of the way there but needs to improve.” (Stakeholder survey respondent)*
- *“Diversity, Equity, and Inclusion Principles work well when inclusive of accountability to ensure quality improvement goals are accomplished. This is relevant with respects to service delivery, allocation of resources, and employment opportunities. I'm appreciative of Oregon's progress and I acknowledge, there's an ongoing need for increased accountability. There continues to be significant disparities which can be addressed and resolved through increased accountability regarding established equity principles.” (Stakeholder survey respondent)*

Policies that do not work well to support integrated, independent living.

- *“We've tried mixed use buildings. People get taken advantage of. Few onsite support systems. Need more in home or onsite support.” (Stakeholder survey respondent)*
- *“What could be improved is hiring far more in-home care givers who are paid a decent wage and with better training.” (Stakeholder survey respondent)*

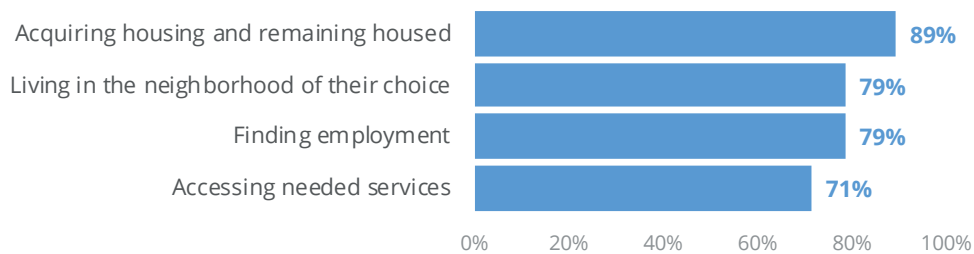
- *“The state's ORS on visitability doesn't seem to lead to many visitable units. The build code does not allow for accessible innovation at the local level due to its maximums on building code.” (Stakeholder survey respondent)*
- *“The average cost is \$35,000 if someone falls and goes to the hospital. Wouldn't it be cheaper to build safer houses in the first place?” (Disability focus group participant)*
- *“Local policies and practices seems to function on a scarcity mentality; there is little room or emphasis put on preference of the person living with disability.” (Stakeholder survey respondent)*

Ease of finding information about modification grants. In general, stakeholders think that it is somewhat or very difficult for people with disabilities to find information about grant and loan programs to make accessibility modifications to their homes.

Principal challenges experienced by residents with disabilities. Acquiring housing and remaining housed, living in a neighborhood of choice, finding employment, and accessing services are all issues identified by a majority of stakeholders to be principal challenges experienced by residents with disabilities.

Figure A-27.

What are the principal challenges faced by persons with disabilities in your community?



Note: n=46.

Source: Root Policy Research from the 2020 OHCS Housing Stakeholder Survey.

Acquiring housing and remaining housed. Among the challenges experienced by persons with disabilities related to acquiring housing and remaining housed, the most common are a lack of units that are affordable to extremely low income households as well as a lack of affordable *and* accessible housing for those with accessibility needs.

- *“Barriers to meeting occupancy criteria; community often have criminal records, bad credit history resulting from disability.” (Stakeholder survey respondent)*
- *“Transportation, navigating housing search.” (Stakeholder survey respondent)*
- *“Not affordable unless subsidized for people on SSI/SSDI.” (Stakeholder survey respondent)*

- *“Extremely low availability.” (Stakeholder survey respondent)*
- *“Many people with disabilities in the communities I serve are very low income and cannot find accessible units they can afford.” (Stakeholder survey respondent)*
- *“Lack of housing designed for individuals with SPMI and SUD.” (Stakeholder survey respondent)*

Reasonable accommodations. As discussed in Section IV, the majority of fair housing complaints filed in Oregon are on the basis of disability, and many involve persons with disabilities being denied reasonable accommodations, often involving requests for service or support animals.

- *“In the Mid-Willamette Valley, we’re seeing a trend that people with disabilities are experiencing discrimination related reasonable accommodation requests for assistance animals.” (Fair housing stakeholder focus group participant)*
- *“Another issue is being discriminated against at the time of application due to disability-related screening issues like criminal history, credit history, etc. that were due to disability. It shows up as drugs, criminal history, lost job or eviction or property debt, but really the disability was the original issue creating the rental barrier and the landlords won’t overlook that as a reasonable accommodation.” (Fair housing stakeholder focus group participant)*

Living in the neighborhood of their choice. For many people with disabilities, particularly those who are reliant on SSI/SSDI income, it is very rare to have the opportunity to live in a neighborhood of choice. More often than not, neighborhood is determined solely by the availability of a unit that the resident can afford which may or may not meet their accessibility needs, much less provide access to opportunity.

- *“The options of finding housing is very limited so you have to take what you can get, which leaves the renter at the mercy of the landlord.” (Stakeholder survey respondent)*
- *“Not all get to choose due to high rent or past renting history.” (Stakeholder survey respondent)*
- *“The availability of affordable housing could result in living in depressed neighborhoods.” (Stakeholder survey respondent)*
- *“Often the housing they can afford is within communities in which other people are experiencing SPMI and active drug use. It can lead to people being taken advantage of.” (Stakeholder survey respondent)*

Finding employment. From the perspective of stakeholders, resources to help residents with disabilities access the workforce are inadequate and range from a lack of access to assistive devices or technologies to employers willing to employ residents with disabilities.

- *“Lack of assistance agencies to help in finding employment, individuals may not have access or means to the Internet or devices.” (Stakeholder survey respondent)*
- *“Need specific services for specific disabilities. More access to technology.” (Stakeholder survey respondent)*
- *“Since COVID it is very difficult.” (Stakeholder survey respondent)*
- *“Inability to work without losing benefits.” (Stakeholder survey respondent)*
- *“There is a lack of employers in my community that will work with people who have challenges maintaining employment.” (Stakeholder survey respondent)*
- *“Few resources or providers of supportive employment.” (Stakeholder survey respondent)*

Accessing needed services. Challenges associated with accessing needed services in the balance of state include lack of access to transportation, lack of Internet access, and a lack of local service providers or capacity among local providers to meet service needs.

- *“Limited without transportation and internet, especially during COVID.” (Stakeholder survey respondent)*
- *“Not enough local service providers.” (Stakeholder survey respondent)*
- *“People have to be connected to a system. Those systems are often at capacity.” (Stakeholder survey respondent)*
- *“No access to mental health services.” (Stakeholder survey respondent)*
- *“Insufficient capacity for cultural affirmation and trauma-informed practices to resolve barriers.” (Stakeholder survey respondent)*
- *“Limited services and long distances.” (Stakeholder survey respondent)*
- *“Few resources or providers; limited service hours.” (Stakeholder survey respondent)*

Recommendations for the state to address these challenges. Adopting and requiring universal design in publicly-funded units, recognizing that brick and mortar is not the only element that makes housing truly inclusive and accessible, directing housing funds outside of metro areas, and actively participating in other statewide efforts to promote integration and independent living are stakeholders’ primary recommendations to address

housing-related challenges experienced by residents with disabilities. With respect to increasing access to employment and services, reducing barriers association with transportation, Internet and technology, and building capacity and increasing funding for case management and rural service provision are key recommendations.

Actions to address housing and neighborhood choice challenges.

- *“The State of Oregon should REQUIRE ALL publicly funded units to have universal accessibility design so that every unit is accessible. It should be the standard that a unit is accessible.” (Stakeholder survey respondent)*
- *“Design and implement age- and ability-friendly housing design and neighborhood centers.” (Stakeholder survey respondent)*
- *“Remember that designing for disabilities goes beyond physical building; goes to operation, management, supports.” (Stakeholder survey respondent)*
- *“Work with the Association of Centers for Independent Living (AOCIL) and the State Independent Living Council (SILC) and participate in the development of the State Plan for Independent Living (SPIL). (Stakeholder survey respondent)*
- *“Get money to the rural counties, and don't spend so much making Portland, Eugene, Salem, Medford happy.” (Stakeholder survey respondent)*

Actions to address access to employment and services.

- *“Transportation should always be available without cost for people with disabilities and who live on nothing.” (Stakeholder survey respondent)*
- *“Increase valuation of people with significant lived experience. Put simply, create policies and increase accountability for hiring more people with lived experience empowering them to lead equitable service transformations. People with lived experience are often asked to share their views and are often not considered for employment. This leaves many feeling demoralized limiting potential for meaningful transformations to improve health reducing disparities at reduced costs. Oregon has made progress. I feel we just need to build on our successes while mitigating repeating past mistakes.” (Stakeholder survey respondent)*
- *“Regulate rent increases more, assistance in getting Internet and devices.” (Stakeholder survey respondent)*
- *“Hire more disability case managers and housing navigators.” (Stakeholder survey respondent)*
- *“Support the development and funding of service providers.” (Stakeholder survey respondent)*

Most needed fair housing resources. When asked about the types of fair housing activities most needed in their service area, seven in 10 stakeholders identified landlord/property manager education as the most needed fair housing activity, followed by enforcement actions (other than filing complaints) resident education, and education and training for local officials and staff. Three in 10 suggest that testing is needed.

- *“BOLI complaints are not effective—unless you have a piece of paper with something that says ‘your children are not allowed to...’ BOLI won’t take it. But, BOLI is not an effective enforcement mechanism. It takes too long.” (Community Advisory Group focus group participant)*
- *“Not enough awareness in any community of what we’re talking about. There should be more information to bring greater awareness. The common person they have enough on their plate with COVID, etc.; they might not look for more information about fair housing law.” (Community Advisory Group focus group participant)*

Language Access

Stakeholders participating in the OHCS Stakeholder Survey responded to a series of questions about the need for language access—translation, interpreting—and the capacity of their organization to meet the needs of residents with limited English proficiency (LEP). Interview and focus group participants discussed their experience with language access and the difficulties LEP households experience when housing documents are only provided in English.

Language access difficulties. Lack of language access in leasing documents, property rules and policies, and other official notices from housing providers puts LEP residents at-risk of housing instability. Language access to community information, including school communications are generally provided in English-only, making it difficult for parents to support and monitor their children’s educational progress.

- *“When they finally can rent in town, everything provided is in English. When there is an issue—dog, numbers of dogs—the papers and information is in English. I tell parents NOT to sign anything they cannot read but they are desperate and have no choice. They frequently sign leases in English and have no idea of the general rules.” (Latino community stakeholder interview participant)*
- *“We finally get Internet to them but then all of the online school materials are in English.” (Latino community stakeholder interview participant)*

Communication with LEP residents. The greatest proportion of stakeholders (42%) work in organizations that need to communicate with LEP residents on a daily basis. As shown in Figure A-28, about one in five need to communicate with LEP residents only a few times a year or never. Most stakeholder organizations provide vital documents in

languages other than English. The most common languages stakeholders encounter is Spanish, but also Chinese, Vietnamese, Burmese, Russian, Somali, Tagalog, ASL, Mam, a Mayan language indigenous to Guatemala and parts of Mexico, Farsi, Swahili, and other African languages.

Figure A-28.
Frequency of Language Access and Provision of Vital Documents in Languages other than English



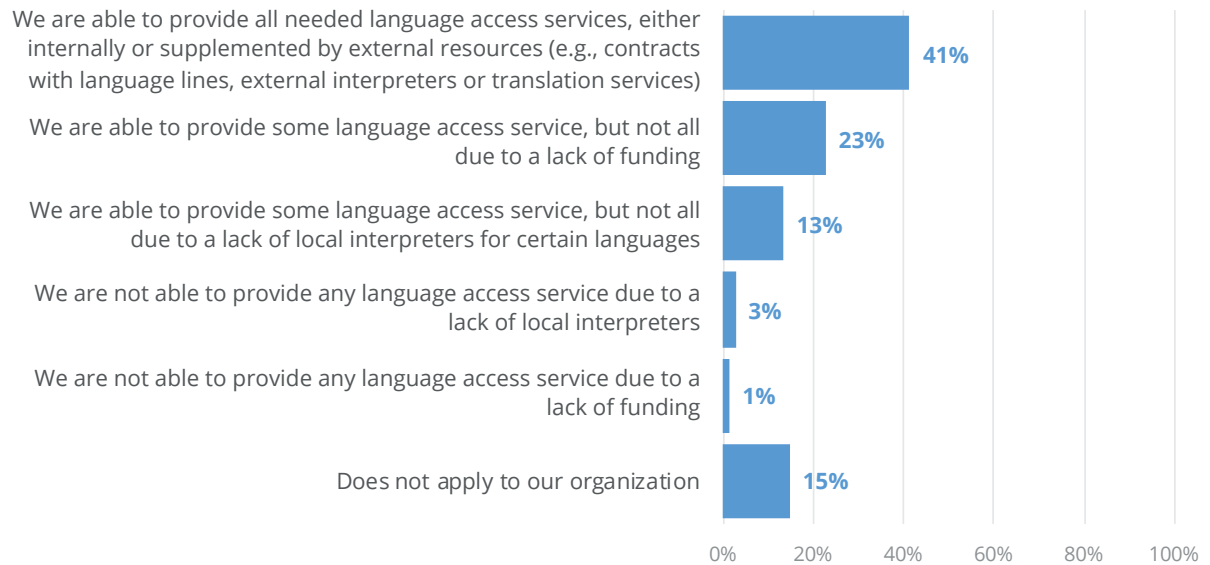
Note: n=76 and n=73.

Source: Root Policy Research from the 2020 OHCS Housing Stakeholder Survey.

Capacity to provide language access. Most stakeholder organizations are able to provide needed language access services, yet additional funding is required to accommodate the full range of needs. Only 1 percent of stakeholders cannot provide any language access services due to a lack of funding, and 3 percent are unable to provide services due to a lack of local interpreters. The greatest proportion (41%) are able to provide all needed language access services internally or supplemented by external resources (e.g., contracts with language lines, external interpreters or translation services). While one in four stakeholders work for organizations that provide some language access, they are unable to meet all of the demand due to a lack of funding. Slightly more than one in 10 (13%) are able to provide language access in some languages but not all due to a lack of local interpreters for certain languages.

- *“We have the language line but in an organization like ours an in person interpreter is much needed but because of funding issues we have not been able to get one.” (Stakeholder survey respondent)*

Figure A-29.
Capacity to Provide Language Access



Note: n=75.

Source: Root Policy Research from the 2020 OHCS Housing Stakeholder Survey.

APPENDIX B.

OUTREACH LIST AND CONSULTATION PARTNERS

PR-10 Consultation; Table 2: Describe Agencies, groups, organizations and others who participated in the process and describe the state's consultations with housing, social service agencies and other entities				
Sort	Agency/Group/Organization	Agency/Group/Organization Type	What Section of the Plan was Addressed by Consultation?	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?
1	Lincoln County	Other government - County	Housing Need Assessment; Homeless Needs - Chronically homeless; Non-Homeless Special Need; Market Analysis; Economic Development	Staff members participated in a regional roundtable to discuss housing, community development, and service needs in their community.
2	Baker City	Other government - Local	Housing Need Assessment; Homeless Needs - Chronically homeless; Non-Homeless Special Need; Market Analysis; Economic Development	Staff members participated in a regional roundtable to discuss housing, community development, and service needs in their community.
3	Wallowa County	Other government - County	Housing Need Assessment; Homeless Needs - Chronically homeless; Non-Homeless Special Need; Market Analysis; Economic Development	Staff members participated in a regional roundtable to discuss housing, community development, and service needs in their community.
4	Wallowa Resources	Services-Education; Services-Employment	Housing Need Assessment; Homeless Needs - Chronically homeless; Non-Homeless Special Need; Market Analysis; Economic Development	Staff members participated in a regional roundtable to discuss housing, community development, and service needs in their community.
5	Adkins Engineering	Services - Narrowing the Digital Divide	Housing Need Assessment; Homeless Needs - Chronically homeless; Non-Homeless Special Need; Market Analysis; Economic Development	Staff members participated in a regional roundtable to discuss housing, community development, and service needs in their community.
6	Lakeview Community Partnership	Planning organization; Neighborhood Organization	Housing Need Assessment; Homeless Needs - Chronically homeless; Non-Homeless Special Need; Market Analysis; Economic Development	Staff members participated in a regional roundtable to discuss housing, community development, and service needs in their community.
7	Lake County Library District	Services-Children; Services-Elderly Persons; Services-Persons with Disabilities; Services-Education; Services - Narrowing the Digital Divide	Housing Need Assessment; Homeless Needs - Chronically homeless; Non-Homeless Special Need; Market Analysis; Economic Development	Staff members participated in a regional roundtable to discuss housing, community development, and service needs in their community.
8	Mid-Columbia Economic Development District	Regional organization	Housing Need Assessment; Homeless Needs - Chronically homeless; Non-Homeless Special Need; Market Analysis; Economic Development	Staff members participated in a regional roundtable to discuss housing, community development, and service needs in their community.
9	Columbia Cascades Housing	Services - Housing	Housing Need Assessment; Homeless Needs - Chronically homeless; Non-Homeless Special Need; Market Analysis; Economic Development	Staff members participated in a regional roundtable to discuss housing, community development, and service needs in their community.
10	CCD Business Development Corporation	Services-Employment	Housing Need Assessment; Homeless Needs - Chronically homeless; Non-Homeless Special Need; Market Analysis; Economic Development	Staff members participated in a regional roundtable to discuss housing, community development, and service needs in their community.
11	AllCare Health	Services-Health	Housing Need Assessment; Homeless Needs - Chronically homeless; Non-Homeless Special Need; Market Analysis; Economic Development	Staff members participated in a regional roundtable to discuss housing, community development, and service needs in their community.
12	Neighborwork Umpqua	Services - Housing	Housing Need Assessment; Homeless Needs - Chronically homeless; Non-Homeless Special Need; Market Analysis; Economic Development	Staff members participated in a regional roundtable to discuss housing, community development, and service needs in their community.

13	Boys and Girls Club of Western Lane County	Services-Children	Housing Need Assessment; Homeless Needs - Chronically homeless; Non-Homeless Special Need; Market Analysis; Economic Development	Staff members participated in a regional roundtable to discuss housing, community development, and service needs in their community.
14	Boys and Girls Club of Greater Santiam	Services-Children	Housing Need Assessment; Homeless Needs - Chronically homeless; Non-Homeless Special Need; Market Analysis; Economic Development	Staff members participated in a regional roundtable to discuss housing, community development, and service needs in their community.
15	Boys and Girls Club of Corvallis	Services-Children	Housing Need Assessment; Homeless Needs - Chronically homeless; Non-Homeless Special Need; Market Analysis; Economic Development	Staff members participated in a regional roundtable to discuss housing, community development, and service needs in their community.
16	City of Corvallis Housing and Neighborhood Services	Other government - Local	Housing Need Assessment; Homeless Needs - Chronically homeless; Non-Homeless Special Need; Market Analysis; Economic Development	Staff members participated in a regional roundtable to discuss housing, community development, and service needs in their community.
17	Oregon Office of Emergency Management	Agency - Emergency Management	Other: Disaster Mitigation and Recovery	A staff member participated in an interview to discuss hazard mitigation, response, and resilience and, emergency management.
18	Latino Community Association of Central Oregon	Regional organization; Services-Employment; Services-Children	Housing Need Assessment; Homeless Needs - Chronically homeless; Non-Homeless Special Need; Market Analysis; Economic Development	A staff member participated in an interview to discuss housing, community development, and service needs in their community.
19	Community Services Consortium	Regional organization	Housing Need Assessment; Homeless Needs - Chronically homeless; Non-Homeless Special Need; Market Analysis; Economic Development	The organization assisted with recruitment and promotion for a virtual resident focus group to discuss housing, community development, and service needs in their community.
20	Community Action Team	Regional organization	Housing Need Assessment; Homeless Needs - Chronically homeless; Non-Homeless Special Need; Market Analysis; Economic Development	The organization assisted with recruitment and promotion for a virtual resident focus group to discuss housing, community development, and service needs in their community.
21	CARE Inc	Services - Housing; Services-Children; Services-Elderly Persons; Services-Persons with Disabilities	Housing Need Assessment; Homeless Needs - Chronically homeless; Non-Homeless Special Need; Market Analysis; Economic Development	The organization assisted with recruitment and promotion for a virtual resident focus group to discuss housing, community development, and service needs in their community.
22	Clatsop Community Action	Services - Housing; Services-Children; Services-Elderly Persons; Services-Persons with Disabilities	Housing Need Assessment; Homeless Needs - Chronically homeless; Non-Homeless Special Need; Market Analysis; Economic Development	The organization assisted with recruitment and promotion for a virtual resident focus group to discuss housing, community development, and service needs in their community.
23	Fair Housing Council of Oregon	Service-Fair Housing	Housing Need Assessment; Homeless Needs - Chronically homeless; Non-Homeless Special Need; Market Analysis; Economic Development	The organization assisted with recruitment and promotion for a virtual resident focus group to discuss housing, community development, and service needs in their community.
24	Oregon Coalition Against Domestic and Sexual Violence	Services - Victims	Housing Need Assessment; Homeless Needs - Chronically homeless; Non-Homeless Special Need; Market Analysis; Economic Development	The organization assisted with recruitment and promotion for a virtual resident focus group to discuss housing, community development, and service needs in their community.
25	Oregon Disabilities Commission	Services-Persons with Disabilities	Housing Need Assessment; Homeless Needs - Chronically homeless; Non-Homeless Special Need; Market Analysis; Economic Development	The organization assisted with recruitment and promotion for a virtual resident focus group to discuss housing, community development, and service needs in their community.

26	Governor's Commission on Senior Services	Services-Elderly Persons	Housing Need Assessment; Homeless Needs - Chronically homeless; Non-Homeless Special Need; Market Analysis; Economic Development	The organization assisted with recruitment and promotion for a virtual resident focus group to discuss housing, community development, and service needs in their community.
27	State of Oregon Housing Stability Council	OHCS Advisory Council representing all types of housing and needs	Housing Need Assessment; Homeless Needs - Chronically homeless; Non-Homeless Special Need; Market Analysis; Priorities; Strategic Plan	Advised on housing needs and priorities and strategic plan
28	National American Indian Housing Council (NAIHC)	Regional organization	Housing Need Assessment; Homeless Needs - Chronically homeless; Non-Homeless Special Need; Market Analysis; Economic Development	Advised on housing needs and priorities and strategic plan
29	Community in Action	Regional organization	Housing Need Assessment; Homeless Needs - Chronically homeless; Non-Homeless Special Need; Market Analysis; Economic Development	Advised on housing needs and priorities and strategic plan
30	Maslow Project	Services-homeless	Housing Need Assessment; Homeless Needs - Chronically homeless; Non-Homeless Special Need; Market Analysis; Economic Development	Advised on housing needs and priorities and strategic plan
31	Marion County Housing Authority	PHA	Housing Need Assessment; Non-Homeless Special Need; Market Analysis;	Advised on housing needs and priorities and strategic plan
32	Multnomah Idea Lab	Health Agency; Other government- Local	Housing Need Assessment; Homeless Needs - Chronically homeless; Non-Homeless Special Need; Market Analysis; Economic Development	Advised on housing needs and priorities and strategic plan
33	University of Oregon	Services-Education	Housing Need Assessment; Homeless Needs - Chronically homeless; Non-Homeless Special Need; Market Analysis; Economic Development	Advised on housing needs and priorities and strategic plan
34	Willamette Management Associates	Other: business valuation, forensic analysis, and transaction financial advisory services	Housing Need Assessment; Homeless Needs - Chronically homeless; Non-Homeless Special Need; Market Analysis; Economic Development	Advised on housing needs and priorities and strategic plan

State of Oregon

2021-2025 Consolidated Plan & Analysis of Impediments to Fair Housing Choice

PRESENTED BY

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Agenda

- 10 min—Background and Findings from Five-year Consolidated Plan
- 10 minutes—Background and Findings from the Analysis of Impediments to Fair Housing Choice (AI)
- 20—Q&A, Discussion



**5-YEAR
CONSOLIDATED
PLAN**

Planning document required by the U.S. Department of Housing and Community Development (HUD). Purpose is to:

1. Identify community development and housing needs, priorities, goals, and strategies;
2. Establish priorities and goals for the five-year allocation of block grant funds—a Strategic Plan;
3. Specify how funds will be allocated among program areas in the first program year—the Action Plan.



Consolidated Plan

Programs and Administering Entities

- Community Development Block Grant (CDBG)—Business Oregon
- Housing Services for persons with AIDS (HOPWA)—Oregon Health Authority
- HOME Investment Partnership Program (HOME)—OHCS
- Housing Trust Fund (HTF)—OHCS
- Emergency Solutions Grant (ESG)—OHCS

Annual Action Plan

Consolidated Plan is carried out through Annual Action Plans (AAP)

- Forward looking report
- AAP reports on annual program goals, funding awards and priorities for each program covered by the Consolidated Plan
- Comprehensive look at federal and non-federal funding utilization to assure federal goal alignment and address priority needs.

Annual Reporting Process

AAP outcomes are reported through the CAPER

- Backward looking document
- Tracks annual and cumulative (5-year) achievements
- Fair Housing Activities reported with the CAPER

Alignment with Statewide Housing Plan

Consolidated Plan & The Statewide Housing Plan

Different Documents

- **Con. Plan** – Document designed to map out use of Community Planning & Development resources to establish eligible activities and budgets for the resources. Focus is on the federal HUD funds, with added reference to state resources that are used in conjunction with the federal funds. Need to demonstrate ties to national objectives.
- **SWHP** – Planning document that establishes Oregon-specific goals. These goals provide OHCS direction for the use of all program resources; adds specificity to the targeting of resources beyond what is covered in the Consolidated Plan.

Program overlap with SWHP goals occur as listed below

**All CPD federal programs are filtered through the Analysis of Impediments*

- CDBG – Rural community support and Homeowner repair*
- HOPWA – Provides rental support to vulnerable population*
- HOME – Provides development dollars for LMI families / TBRA*
- HTF – Dev. program aligning with PSH in 2021, for ELI families*
- ESG – Emergency Shelter and Homeless Prevention support*



Alignment with Statewide Housing Plan

- A stakeholder survey **focused on economic and community development** fielded with local and regional economic and community development experts, local elected officials, and city and county staff (76 respondents);
- A stakeholder survey **focused on housing needs**, special needs populations, and fair housing with a diverse range of local experts in housing, human services, advocacy and more (109 respondents);
- Six regional roundtable discussions (conducted by zoom) with representatives of rural Oregon community and economic development organizations and human service agencies (26 participants);
- Resident focus groups representing persons with disabilities and older adults, veterans, persons experiencing homelessness, Latinx/immigrants (in Spanish);
- Focus groups and in-depth interviews with residents most likely to experience housing discrimination and economic insecurity. Groups included the education and enforcement staff of the Fair Housing Council of Oregon (FHCO).



Engagement Elements

- Housing in substandard condition continues to be a challenge, and stakeholder roundtable participants emphasized that much of the naturally occurring affordable housing (NOAH) in their region is in **poor condition**. Resources dedicated to housing rehabilitation are oversubscribed.
- **Supportive services**, especially those addressing mental health and substance use disorders (SUDS) are essential to helping many vulnerable residents remain housed. Current resources are described as insufficient and are not available in many rural communities.
- The **state-administered insurance fund** available to housing providers whose property is damaged by tenants is seen as administratively cumbersome, requires landlords to go through court processes, and is capped at an amount too low to justify the time and effort necessary to obtain relief funds.



Primary Findings

- **Among persons experiencing homelessness**, stakeholders believe that those with mental health challenges, those who are chronically homeless, persons with substance use disorders, persons with criminal histories or felonies, and people in rural areas have the **greatest unmet housing or supportive service needs**.
- The housing and service activities stakeholders prioritize as having **the greatest impact on homelessness** in Oregon, included:
 - Permanently Supportive Housing (PSH);
 - Additional affordable housing;
 - Emergency shelter beds;
 - Emergency rent assistance; and
 - Housing assistance/vouchers.



Primary Findings

Most Urgent Housing Needs

Top 5 Responses of Stakeholders

- More rental housing for extremely low income households (<30% AMI);
- More rental housing for very low income households (<60% AMI);
- Emergency shelters for people who are homeless;
- Transitional housing for moving people out of homelessness;
- More rental housing for low to moderate income households (<80% AMI).

Direction of Housing Funding

Top 5 Responses of Stakeholders

- Additional affordable housing stock;
- Emergency shelter beds;
- Mental health services;
- Permanently supportive housing units;
- Emergency rental assistance.

ANALYSIS OF IMPEDIMENTS

Analysis of Impediments

- 5 Year Planning Document (2021-2025)
- Used to help determine barriers to affordable housing
- Requires a plan to reduce or eliminate these barriers
- Reported out annually through the Fair Housing Action Plan (FHAP) which is a part of the Consolidated Annual Performance and Evaluation Reports (CAPER)

Disparities in Housing



17% of Oregon households are **SEVERELY COST BURDENED**

Black/African Americans are **1.9x** more likely to be severely cost burdened

Native Americans and Hispanics are **1.3x** more likely to be severely cost burdened



3% of residents in the balance of the state live in **CROWDED CONDITIONS**

Hispanic residents are **5x** more likely to live in crowded conditions



63% of Oregon households are **HOMEOWNERS**



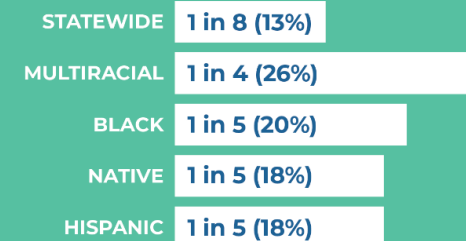
52% of Native Americans

42% of Hispanics

35% Black/African Americans



1 in 8 (13%) mortgage loan applications are **DENIED** statewide



Disparities in Access to Opportunity



Oregon's
poverty rate is **13%**

Black/African Americans are **1.7x** more likely to live in poverty

Hispanics are **1.4x** more likely to live in poverty

1 in 5 high school students do not graduate on time



1 in 3 (35%) 
Native American students

1 in 3 (32%) 
Black/African American students

Black/African American students, Native American students, and students with disabilities are twice as likely to be suspended than other students state-wide (10%, 9%, 9%, respectively)



27%
of all Oregon 8th graders score below Basic in Reading compared to...



85% of English Language Learners



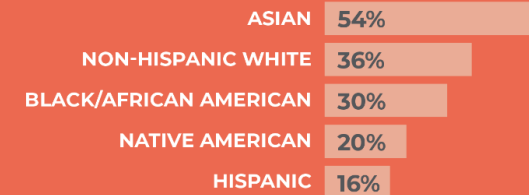
68% of students with disabilities



40% of Hispanic students



1 in 3
Oregonian adults has a college degree compared to...



For every \$1
earned by a college graduate in Oregon, a...

\$0.55

Worker with less than a high school degree earns \$0.55

\$0.62

Worker with a high school diploma/GED earns \$0.62

\$0.69

Worker with some college/ Associate's degree earns \$0.69



More than **25,000** state highway crossings are not ADA accessible

50% of state highway pedestrian crossings are not ADA compliant



> 191,000 (12%) households do not have an internet subscription

Research Finding #1.

Members of protected classes, particularly people with disabilities and people of color, experience **disparities in rental housing choice.**

- **Impediment 1-1. Shortage of rental housing units** affordable to 30%-50% MFI disproportionately impacts people of color, persons with disabilities, and single parent households.
- **Impediment 1-2. Direct discrimination** on the basis of protected class status.
- **Impediment 1-3. Broad application of criminal history, eviction, and poor credit tenant screening** disproportionately impacts persons of color, people with SPMI, people with a history of SUDS. SSN requirements impact undocumented residents.

Research Finding #1.

Members of protected classes, particularly people with disabilities and people of color, experience disparities in rental housing choice.

- **Impediment 1-4.** Residents with disabilities **cannot find accessible and affordable rental units**, especially in rural Oregon, and often live in housing that is in poor condition or does not meet their accessibility needs.
- **Impediment 1-5. NOAH is often in poor condition** in rural Oregon. In non-entitlement areas, 15 percent of Hispanic households live in substandard housing conditions.
- **Impediment 1-6. Source of income discrimination persists.** Fines are too low to spur widespread compliance and noncompliance is perceived as a low risk. the Housing Choice Landlord Guarantee Program—is not considered an effective and efficient remedy.

Research Finding #2.

People of color disproportionately experience **barriers to attaining homeownership.**

- **Impediment 2-1.** Historical segregation and disinvestment coupled with past discrimination in lending and disparities in access to economic opportunity creates a **wealth gap** that negatively impacts mortgage lending outcomes.
- **Impediment 1-2. Lenders deny Black and African American, Native American, and Latino/Hispanic applicants at higher rates** than non-Hispanic White applicants, and these higher denial rates persist even after accounting for income.
- **Observation.** Applicants of color are much more likely than non-Hispanic White applicants to be denied loans for refinancing, home improvements, or cash out refinancing.

Research Finding #3.

Members of protected classes disproportionately experience **barriers to accessing economic opportunity.**

- **Impediment 3-1. Disparities in access to high quality learning environments** by students of color, English language learners, and by students with disabilities are evidenced in school discipline rates, test scores, and graduation rates limit educational attainment and future employment opportunities of affected-students.
- **Impediment 3-2. Inadequate Internet infrastructure in rural Oregon** disproportionately impacts families with children and people of color, limiting access to remote learning, employment opportunities, and telehealth.
- **Impediment 3-3.** The analysis of program beneficiaries found that none of the Microenterprise program participants were businesses owned by persons of color.

Research Finding #3.

Members of protected classes disproportionately experience **barriers to accessing economic opportunity.**

- **Impediment 3-4.** Since the last AI, the State of Oregon has entered into three settlement agreements to address **failures to comply with ADA and Olmstead integration mandates** related to lack of accessible ramps at state highway pedestrian crossings, lack of emphasis on supported employment in integrated environments rather than sheltered workshops, and lack of integrated, community based independent living options for residents with serious and persistent mental illness.
- **Impediment 3-5. Lack of access to mental health services, substance use disorder treatment, and other supportive services** leads to housing instability and homelessness, disproportionately impacting persons with disabilities, African American, Native American, and Hispanic residents.

Research Finding #4.

Residents still **lack knowledge of their fair housing rights**, are not empowered to take action, and have **very limited fair housing resources locally**.

- **Impediment 4-1.** Residents still have **low awareness of their fair housing rights and of resources available** to them to assert their rights, especially in the balance of state. Building the fair housing capacity of local culturally specific and culturally relevant organizations is needed.
- **Impediment 4-2.** Landlords, especially **medium and small housing providers in the balance of state, would benefit from fair housing education and training**, especially related to reasonable accommodations and source of income protections.
- **Impediment 4-3.** BOLI has made some improvements since the last AI, **the complaint process remains lengthy and complex, and the state is still not substantially equivalent.**

DISCUSSION

Questions for the Council

Q&A, Discussion

As we work to finalize this Consolidated Plan, which is used to guide our use of resources provided through HUD, what would you hope to better understand?

We had conceptualized a “peer review” of the documents by an advisory committee. What guidance would you have about the membership of such a group?

Q&A, Discussion

During this process, HUD pulled back on Affirmatively Furthering Fair Housing (AFFH) guidance by implementing the Preserving Community & Neighborhood Choice rule which essentially reduces AFFH requirements to “any action above what is required by statute related to promoting any of the attributes of fair housing”.

OHCS has chosen to continue the much more thorough analysis outlined in the HUD Analysis of Impediments process and looked for ways to improve upon it. Was this the correct approach and does the board suggest we continue down this path as move into implementation of the Consolidated Plan (and pending changes to the most current HUD guidance)?

Most Urgent Housing Needs

Housing Activity	# of Responses
More rental units for extremely low income/poverty-level households (at 30% AMI)	61
More rental housing for very low income households (60% AMI or less)	61
Emergency shelters for people who are homeless	49
Transitional housing for people moving out of homelessness	46
More rental housing for low to moderate income households (80% AMI or less)	42
Repurpose vacant/underutilized properties into affordable housing	41
Affordable and accessible housing units for people with disabilities	40
Long-term tenant based rental assistance (6+ months)	38
Funds to pay rental debts accumulated from March 2020 to present (COVID-related)	28
More homes for low to moderate income households to buy (60%-120% AMI)	28
Services that help residents achieve or maintain housing stability (supportive services)	26
Navigators to help residents locate and qualify for affordable housing/housing assistance	24
Emergency assistance to pay utilities	18
Short-term tenant based rental assistance (3-6 months)	15
Preservation of affordable homeownership in manufactured home communities	15
Funds to pay mortgage debts accumulated from March 2020 to present (COVID-related)	14
Assistance to low income homeowners for accessibility modifications (ramps, grab bars)	14
Emergency assistance for vehicle repairs	11
Assistance for health and safety repairs for low and moderate income homeowners	11
Assistance to low income renters for accessibility modifications (ramps, grab bars)	10
Search engine/database to locate and qualify for affordable housing/housing assistance	10
Assistance for health and safety repairs for low and moderate income renters	6
Housing for area workforce	6
Lead-based paint abatement and control	2

Direction of Housing Funding

Most Impactful Type of Housing or Service	# of Responses
Additional affordable housing stock	36
Emergency shelter beds	35
Mental health services	35
Permanently supportive housing units	34
Emergency rent assistance	33
Transitional housing units (up to two years tenancy)	31
Deposit assistance (first and last month, security, pet)	30
Financial assistance for rental application fees, background checks	30
Case management/housing navigator	30
Financial assistance in overcoming barriers to tenancy (e.g., debts owed)	29
Finding housing providers who will forgive/accept past convictions	28
Providing housing assistance benefits (e.g. Housing Choice Vouchers, VASH)	26
More flexible dollars to assist folks in overcoming these barriers	25
Addiction services	24
Finding housing providers who will forgive/accept past evictions	23
Emergency utility assistance	22
Transportation vouchers	20
Culturally-specific or responsive services	20
Life skills training/support	20
Street outreach to homeless	20

APPENDIX C.

CITIZEN PARTICIPATION PLAN

CITIZEN PARTICIPATION PLAN

May 7, 2021

2021 – 2025

for HUD Funding of CDBG, HOME, HTF, ESG, and HOPWA
by Oregon Business Development Department, Oregon Health Authority
and Oregon Housing and Community Services



PURPOSE

The purpose of this Citizen Participation Plan is to encourage collaborative problem solving through involvement of the residents of Oregon along with public and private agencies that serve their needs through use of the covered funds available from HUD.

UNIVERSAL ELEMENTS

TARGETED POPULATIONS

- Elderly including frail elderly
- Low and moderate income persons
- Minorities and People of Color
- Persons with Disabilities, including physical, mental, developmental, intellectual, and persons experiencing chemical or other addictions
- Persons with HIV/AIDs and their families
- Persons experiencing homelessness or near homelessness
- Farm workers

CONSULTING PARTNERS

- Residents of Oregon
- Oregon Department of Human Services
- Oregon Health Authority
- Oregon Public Housing Authorities
- Oregon CDCs, including CHDOs
- Oregon economic development organizations
- Oregon Association of Community Development Officials
- League of Oregon Cities
- CASA of Oregon
- Oregon Association of Counties
- Oregon Council on Developmental Disabilities
- Oregon Disability Commission
- Oregon Indian Nations
- Faith-based groups
- Oregon Continuums of Care
- Local governments, port authorities and economic development agencies
- Oregon non-profit and for-profit groups providing services to targeted populations
- Local business and civic leaders
- publicly funded institutions and systems of care that may discharge persons into homelessness
- agencies and entities providing data or services relating to Lead Based Paint
- Rural Development (U.S. Department of Agriculture)
- Oregon Community Action Agencies

TARGETED NOTICE CONTACTS

- Newspaper of general circulation formal hearing and comment period notices
- Media outlets
- Consulting partners
- Various neighborhood, public housing, religious and other organizations providing services to targeted populations by press release or notice.
- Any person or group requesting notice

DOCUMENT AVAILABILITY

- OHCS web site <http://www.oregon.gov/ohcs/pages/consolidated-plan-five-year-plan.aspx>
- OBDD web site <http://www.orinfrastructure.org/>
- Reasonable numbers of print copies will be made available free of charge
- OBDD, 775 Summer Street NE, Suite 200, Salem, OR 97301
- OHCS, 725 Summer Street NE Suite B, Salem, OR 97301

ACCOMMODATION AT MEETINGS AND HEARINGS

Public meetings or hearings will be held

- at locations convenient for targeted populations
- in a facility which is fully accessible to the physically handicapped
- at a time convenient for targeted populations (generally over the noon hour)
- accommodation for translation/interpreter services for limited English proficient persons will be provided upon request.
- with accommodations made for special needs when accommodation is requested at least five days prior to the event

PUBLIC AND PARTNER INPUT

- all citizen input will be considered by Oregon in determining final decisions on all covered documents
- a summary of all citizen input will be included in all covered documents along with Oregon's response to the input, including changes to the covered document or an explanation of why the comments did not elicit any changes
- minutes from all public hearings will be included in submission of covered documents
- translation services will be provided for any public hearing where a significant number of non-English speaking residents can be reasonably expected to participate or if requested at least five days prior to the event.

COVERED DOCUMENTS

- Consolidated Plan – a document generally projecting the five year amount, use, and beneficiaries of the HUD funds for Community Development Block Grant, Emergency Solutions Grant Program, Home Partnership Grant (including American Dream Down payment Initiative), Housing Trust Fund and Housing of Persons with Aids grants

- Annual Action Plans – individual detailed annual plans for each of the five years of the Consolidated Plan.
- CDBG Method of Distribution
- Consolidated Annual Performance Evaluation Reports (CAPER) outlining actual results of Action Plan activities for the previous calendar year
- Substantial Amendments to the Consolidated Plan – defined as one or more the following
 - Changes to fund allocation priorities
 - Changes in method of distribution of funds not already discussed in the Consolidated Plan
 - Use of funds (including program income) for an activity not previously described in the CDBG MOD or Annual Action Plan
 - Substantial¹ changes in the purpose, scope, location, or beneficiaries of and activity.

FORM OF NOTICE CHART				
DOCUMENT	PUBLIC HEARING	COMMENT PERIOD	SUBMIT TO HUD ²	FORM OF NOTICE
Consolidated Plan	Yes	30 days	No later than 45 days prior to start of next planning period	Newspaper OHCS Website Via e-mail to Partners
Annual Action Plan and CDBG MOD	Optional	30 days	No later than 45 days prior to start of next planning period	Newspaper OHCS Website Via e-mail to Partners
CAPER and PER	Not required	15 days	No later than 90-days following end of Program Year. ³	Newspaper OHCS Website Via e-mail to Partners
Amendments	Optional	30 days	At time of amendment or no later than end of Program Year.	Newspaper OHCS Website Via e-mail to Partners
All Documents During a Public Health Emergency or	Optional	5 days	As required	Newspaper OHCS Website Via e-mail to Partners

¹ Substantial is defined as a variance of 20% or more from the average of the previous five years funding and/or goals.

² Periodically the schedule submission will shift based on guidance or extensions. For a complete Consolidated Plan submission schedule please check the following website <http://www.oregon.gov/ohcs/pages/consolidated-plan-five-year-plan.aspx>.

³ Current Program Year is January to December.

⁴ Reasonable to be determined by State or Federal program guidelines as determined during the emergency.

a reasonable time thereafter ⁴				
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CDBG RECIPIENTS

CDBG recipients are required to follow citizen participation requirements contained in the Method of Distribution.

COMPLAINTS

Oregon will respond, in writing, within fifteen working days of to any comment related to the Consolidated Plan, Annual Action Plan, Method of Distribution, PER, CAPER, or any substantial Program Amendment.

CONTACTS

Rick Ruzicka
Oregon Housing and Community Services
725 Summer Street NE – Suite B
Salem, OR 97301-1266
503-986-6824
Rick.ruzicka@Oregon.gov

Fumi Schaadt
Oregon Business Development Department
775 Summer Street NE – Suite 200
Salem, OR 97301-1280
503-986-0027
fumi.schaadt@oregon.gov

APPENDIX D.

NOTICES OF DRAFTS AND PUBLIC HEARINGS

NOTICE OF PUBLIC COMMENT PERIOD

The State of Oregon through its agencies: Oregon Housing and Community Services (OHCS), Oregon Health Authority, and Oregon Business Development Department, are seeking public comments for our priorities for housing and community development on the Oregon:

- **2021-2025 Consolidated Plan**
- **2021 Annual Action Plan (AAP) – embedded into the 2021-2025 Consolidated Plan**
- **Citizen Participation Plan**
- **2021-2025 Analysis of Impediments**

All Oregon residents are invited to submit comments during the 30-day public comment period beginning **May 7, 2021 and ending June 6, 2021**. Written comments may be submitted to Oregon Housing and Community Services; attention Rick Ruzicka, Senior Operations and Policy Analyst, 725 Summer Street NE, Suite B, Salem, OR 97301-1266, or by e-mail at Rick.Ruzicka@oregon.gov. Verbal comments may be submitted by calling 503-986-6824. **Comments are due no later than Sunday, June 6, 2021 at 5 pm.**

A copy of all of these documents, and any applicable attachments, are available at Oregon Housing and Community Services at <https://www.oregon.gov/ohcs/development/Pages/consolidated-plan.aspx>.

OHCS is committed to providing meaningful access. For accommodations, modifications, translation, interpretation or other services, please contact the OHCS office at **PH 503-986-2000, TTY 503-986-2100**, or e-mail at housinginfo@oregon.gov.

Las personas sordas o con impedimentos auditivos pueden usar un TTY llamando al 503-986-2100, o al servicio de relevos 711/Oregon. Las personas que necesitan copias en otros idiomas u otro acomodación deben comunicarse con Rick Ruzicka al 503-986-2000 a la brevedad posible.

Questions, concerns, or requests for information in alternative formats from individuals with disabilities must be submitted to Rick Ruzicka before **Tuesday June 1, 2021**.

OHCS will be holding two virtual public hearings for these documents on May 27, 2021 through Zoom. The hearings may be accessed through the following links at the corresponding times and are scheduled to last for 1 hour:

- May 27, 2021 @ 1:00 pm PST - <https://us02web.zoom.us/j/81403090718?pwd=UVdpZkwyHRpR1hQb3dCNlJiZFRvdz09>
- May 27, 2021 @ 5:00 pm PST - <https://us02web.zoom.us/j/88907308227?pwd=ZTMxcEpPZjdiS04wdnRhbXZFRWxRUT09>

Oregon Housing and Community Services programs are administered in a nondiscriminatory manner, consistent with Equal Opportunity Employment Opportunities, Affirmative Action, and Fair Housing requirements.

NOTICE OF PUBLIC COMMENT PERIOD

The State of Oregon through its state agency Business Oregon, is seeking public comments on the:

Proposed 2021 Method of Distribution

The **Community Development Block Grant (CDBG) Proposed 2021 Method of Distribution** covers U.S. Department of Housing and Urban Development funding for the Community Development Block Grant (CDBG) Program. The CDBG Proposed 2021 Method of Distribution addresses the use of CDBG funds for the program year January 1, 2021 through December 31, 2021 and can be viewed at:

<http://www.orinfrastructure.org/Infrastructure-Programs/CDBG/Handbooks/>

All Oregon residents are invited to submit written or verbal comments during a 30 day public comment period beginning **February 26 through March 28, 2021**. The 30-day public comment period for the 2021 Proposed Method of Distribution concludes at 5:00 p.m. on March 28, 2021. Written comments may be submitted to the attention of Rena Schoen, Community Development Block Grant Program and Policy Coordinator, Business Oregon, 775 Summer Street NE, Suite 200, Salem, OR 97301 or by email at rena.schoen@oregon.gov.

A public hearing will be held on **March 23, 2021** from 12:00 PM -1:00 PM online at:

Join on your computer or mobile app

[Click here to join the meeting](#)

Or call in (audio only)

[+1 503-446-4951,,333950872#](tel:+15034464951333950872) United States, Portland

Phone Conference ID: 333 950 872#

[Find a local number](#) | [Reset PIN](#)

Persons who are deaf or hearing-impaired may use a TTY by calling 503-986-2100. Persons needing copies in other languages or other accommodations should contact Rena Schoen at 503-986-6294 or via e-mail at rena.schoen@oregon.gov prior to the close of the comment period.

Persons needing copies in other languages should contact the respective person listed above at their earliest convenience. Questions, concerns, complaints, or requests for information in alternative formats from individuals with disabilities must be submitted at least ten days before the end of the comment period (March 16, 2021). Deaf and hearing-impaired individuals may use a TTY by calling 503-986-2100.

Business Oregon programs are administered in a nondiscriminatory manner, consistent with Equal Opportunity Employment Opportunities, Affirmative Action, and Fair Housing requirements.

APPENDIX E.

OBDD-IFA SUPPLEMENTAL APPENDIX

Business Oregon Stakeholder Survey Email Invite

Subject: Business Oregon needs your expertise.

The state of Oregon, as a recipient of funds from the U.S. Department of Housing and Urban Development (HUD), is conducting a survey to collect updated information on housing and community development needs in the state to inform its new Five-Year Consolidated Plan. **The Consolidated Plan is a HUD requirement and sets the strategic vision for the allocation of housing and community development block grant funds for 2020 through 2024.**

All of us at **Business Oregon** recognize you have many competing priorities during this time as you, your families and your communities continue to make efforts to mitigate the impacts of COVID-19. However, we value your input and greatly appreciate you taking the time to complete the survey and provide valuable insight on the community and economic development needs across the state.

You can access the survey online at: <https://www.research.net/r/BizOR2020>

The survey is not specifically related to the COVID-19 pandemic but does include some questions related to its impact. Findings from the survey will also inform Oregon's Analysis of Fair Housing Choice, which examines the existence of and reasons for barriers to housing choice and access to economic opportunity.

This survey is designed for town/city/county managers and mayors, community and economic development staff, and planning staff in CDBG-eligible areas*. Because HUD funding at the state level is focused on the state's smaller cities and rural areas, we are especially interested in hearing from people who work in these communities. We also welcome input on statewide issues that affect Oregon residents, regardless of where they live.

Please invite others in your field to participate in the survey by sharing the link above; we want to receive participation from a diverse group of stakeholders.

You can access the survey online at: <https://www.research.net/r/BizOR2020>

This survey closes on October 2, 2020.

If you have any questions about this planning process, need translation of the survey into a language other than English, or need other accommodations to take the survey, please contact hello@rootpolicy.com or 970-880-1415.

Thank you for your participation and interest!

*CDBG-eligible areas include non-metropolitan cities and counties in rural Oregon. This excludes Oregon tribes and urban cities—Albany, Ashland, Beaverton, Bend, Corvallis, Eugene, Grants Pass, Gresham, Hillsboro, Medford, Portland, Redmond, Salem, and Springfield—and urban counties—Clackamas, Multnomah, Washington—which receive funds directly from HUD.

Business Oregon

CDBG COMMUNITY ENGAGEMENT FINDINGS

PRESENTED BY

Jen Garner, *Senior Consultant*



Denver, Colorado 80220
970.880.1415 x (104)
jen@rootpolicy.com

HIGHEST PRIORITY HOUSING NEEDS

1. MORE RENTAL UNITS FOR EXTREMELY LOW INCOME HH
2. EMERGENCY SHELTERS FOR PEOPLE WHO ARE HOMELESS
3. MORE RENTAL HOUSING FOR VERY LOW INCOME HH
4. TRANSITIONAL HOUSING FOR PEOPLE
MOVING OUT OF HOMELESSNESS
5. AFFORDABLE AND ACCESSIBLE HOUSING
FOR PEOPLE WITH DISABILITIES
6. REPURPOSE VACANT/UNDERUTILIZED
PROPERTIES INTO AFFORDABLE HOUSING
7. MORE LOW/MOD RENTAL HOUSING
8. LONG-TERM TBRA (6+ MONTHS)

Highest Priority Housing Activities to Meet Most Urgent Needs

**HIGHEST PRIORITY
HOMELESS NEEDS**

-
1. PERMANENTLY SUPPORTIVE HOUSING
 2. ADDITIONAL AFFORDABLE HOUSING
 3. EMERGENCY SHELTER BEDS
 4. EMERGENCY RENT ASSISTANCE
 5. HOUSING ASSISTANCE/VOUCHERS

**Highest Priority Housing and
Services to Have the Greatest Impact
on Homelessness**

**HIGHEST PRIORITY
COMMUNITY
DEVELOPMENT
NEEDS AND
OUTCOMES**

Greatest Unmet Community Development Needs

Community Development Activity	% of Responses
Water and sewer infrastructure	45%
Infrastructure for Internet access to a community or parts of a community	40%
Downtown/Main Street revitalization	37%
Community facilities/capacity for mental health services	36%
Microenterprise business assistance (formation, bookkeeping, etc)	25%
Sidewalk improvements	22%
Infrastructure for Internet access to connect existing fiber/cable to homes or buildings	21%
Job training/skill development	21%
Lack of/limited capacity of nonprofits to provide needed public services	18%
Hotspots for wireless access at community locations	12%
Stormwater infrastructure	12%
Adapting existing facilities to meet CDC, state, or local public health guidelines	12%
Public transit	10%
Capacity building and technical assistance	10%
Community centers (general)	9%
Community facilities/capacity for food bank/food provision	7%
Community facilities/capacity for Head Start or Early Childhood Education programs	7%
Programs to increase digital literacy (e.g., basic Internet skills)	7%
Removal of structural barriers to achieve ADA accessibility	7%
Flood drainage infrastructure	7%
Other type of community facility	6%
Internet-capable devices (e.g., smartphones, tablets) for residents in need	6%
Historic preservation or restoration	6%
Community facilities/capacity for domestic violence shelter	4%
Community facilities/capacity for senior centers	4%
Community facilities/ capacity for libraries	3%
Community facilities/ capacity for fire stations	3%

Prioritized Community Development Needs

Community Development Needs	Weighted Rank Score
Infrastructure for Internet access to a community or parts of a community	88
Water and sewer infrastructure	82
Community facilities/capacity for mental health services	59
Downtown/Main Street revitalization	50
Infrastructure for Internet access to connect existing fiber/cable to homes or buildings	43
Microenterprise business assistance (formation, bookkeeping, etc)	38
Lack of/limited capacity of nonprofits to provide needed public services	37
Sidewalk improvements	32
Adapting existing facilities to meet CDC, state or local public health guidelines	21
Job training/skill development	20
Stormwater infrastructure	19
Community facilities/capacity for Head Start or Early Childhood Education programs	19
Community facilities/capacity for food bank/food provision	17
Community centers (general)	15
Capacity building and technical assistance	13
Public transit	13
Hotspots for wireless access at community locations	12
Community facilities/capacity for domestic violence shelter	11
Flood drainage infrastructure	9
Internet-capable devices (e.g., smartphones, tablets) for residents in need	8
Programs to increase digital literacy (e.g., basic Internet skills)	7
Removal of structural barriers to achieve ADA accessibility	6
Historic preservation or restoration	4
Other type of community facility	4
Community facilities/capacity for libraries	3
Community facilities/capacity for senior centers	3
Community facilities/capacity for fire stations	2

1. LOW INCOME HOUSING, WORKFORCE DEVELOPMENT & HOUSING, AGING INFRASTRUCTURE (SEWER/WATER), CHILDCARE, & BROADBAND ARE URGENT NEEDS IN EACH REGION.
2. IT IS CRUCIAL FOR SMALL TOWNS AND RURAL JURISDICTIONS TO HAVE ADDITIONAL TECHNICAL AND ADMIN ASSISTANCE ACROSS THE BOARD, FROM FINDING FUNDING TO EXECUTING A PROJECT THROUGH TO FRUITION (MOMENTUM, RELATIONSHIP BUILDING, CONTINUITY).
3. STREAMLINE PROCESSES (CREATE TEMPLATES, PROVIDE TECHNICAL ASSISTANCE, TRAINING, ETC), TO REDUCE THE LIFT ON SMALLER, MORE THINLY STAFFED (OR NON-STAFFED!) JURISDICTIONS.
4. REVIEW PROCESSES, PROJECT REQUIREMENTS, FROM THE PERSPECTIVE OF SMALL RURAL JURISDICTIONS TO IDENTIFY OPPORTUNITIES FOR FLEXIBILITY.

Topline Findings from Stakeholder Roundtables

Community Development Outcome	% of Responses
Higher quality and affordable childcare centers	57%
Digital/broadband is available to residents regardless of their geographic location	51%
Economic growth/positive economic impact	49%
Increase in local jobs	47%
Increase in local businesses	38%
Lower water and sewer fees paid by residents	36%
Catalyst for neighborhood or commercial district revitalization	32%
Additional mental health care facilities	32%
A revitalized, attractive, Main Street	30%
Quality community centers	25%
Improved emergency services (e.g., fire stations, fire trucks, emergency equipment)	15%
More trainings and technical assistance for local businesses	13%
Streets and sidewalks are more accessible to persons with disabilities	13%
Better access to job training programs	11%
More trainings and technical assistance to area nonprofits	11%
Additional general health care facilities	9%
Additional opioid rehabilitation centers	9%
Options/expansion of “telemedicine”—online medical assistance/video chats	8%
Higher quality library	2%

High Priority Community Development Outcomes from CDBG

Dear Community Stakeholder [tailored for region],

The State of Oregon is in the process of preparing its HUD-required 5-Year Consolidated Plan. The purpose of the Consolidated Plan is to identify housing and community development needs of low income residents and other vulnerable populations, and to set priorities for how the Oregon will allocate Community Development Block Grant and other HUD funds over the next five years.

Please join us for a virtual roundtable discussion with other region leaders. The expertise and knowledge you bring to this discussion will help the state strategically deploy federal resources in the **XXX** region. While the discussion will include housing needs, **the primary focus will be economic and community development needs.**

Focus groups will be in virtual format via Zoom. Please RSVP to Kristin Aaker at hello@rootpolicy.com a link to the meeting will be emailed to you. If you are unable to participate, feel free invite a colleague from your organization to take your place.

We look forward to your participation,

Hello,

We are excited to have you participate in our virtual regional roundtable discussion. We encourage you to join the meeting on time and use the video capabilities of your device in order to have a more “in-person” feel at the meeting. This will also help us moderate the meeting and encourage participation from everyone attending.

Below you will find the link and details to the meeting:

If you have any trouble joining the meeting, please feel free to contact me.

Thank you,

Kristin Aaker
Root Policy Research

Roundtable #					
#1	#2	#3	#4	#5	#6
Columbia Gorge/ Northeast Oregon	Central/South Central / Southeast Oregon	North Coast	Willamette Valley	Southern Oregon	South Coast
10/26 10:00-11:00	10/26 1:00-2:00	10/27 10:00-11:00	10/27 1:00-2:00	10/28 10:00-11:00	10/28 1:00-2:00
Hood River	Jefferson	Clatsop	Polk	Douglas	Coos
Sherman	Crook	Tillamook	Marion	Josephine	Curry
Gilliam	Deschutes	Lincoln	Benton	Jackson	
Wasco	Klamath		Linn		
Wheeler	Lake		Lane		
Morrow	Harney				
Umatilla	Malheur				
Union					
Wallowa					
Baker					
Grant					

Business Oregon Stakeholder Focus Group Guide

- **Gauge familiarity the Consolidated Plan. *How many of you are familiar with the Consolidated Plan?*** [Depending on the answer provide more or less info as needed from below.]
- **Background on the Con Plan.** Oregon receives Community Development Block Grants (CDBGs) funds for community development and housing activities from the United States Department of Housing and Urban Development (HUD). To receive these funds, the state must prepare a 5 year Consolidated Plan and a 1-Year Annual Plan.

The Consolidated Plan is designed to help states and local jurisdictions to assess their affordable housing and community development needs and housing market conditions, and to make data-driven, place-based investment decisions. The consolidated planning process serves as the framework for a community-wide dialogue to identify housing and community development priorities that align and focus funding from CDBG.

Eligible activities for CDBG funding include the following:

- **Reconstruction/rehabilitation** of homes or other property
- **Downpayment** assistance
- **Construction** of community centers, parks and recreation facilities, facilities to serve special populations (e.g., senior centers)
- **Construction of public facilities and improvements**, including streets and sidewalks
- **Demolition of property** to prepare land for other uses
- **Code enforcement**
- Provision of **employment assistance** (e.g., employment training programs)
- Provision of **public services for special needs populations**, including youth, persons with disabilities, persons who are homeless, seniors, victims of domestic violence, and for persons with HIV/AIDS ("*public service activities*")

I'd like this discussion to be pretty informal, honest and thoughtful. I also want to hear from everyone in the room. Ideally, I will hardly talk at all. My role is to ask questions, keep us on topic and help keep the discussion flowing. I will make time at the end of the discussion to be sure that there is an opportunity to discuss any topics that might not have been covered.

Participant Introductions

Let's start by introducing ourselves. Tell us your name, the organization you represent and the types of people or populations you serve or your area of advocacy or expertise.

Greatest needs

How would you describe the greatest housing needs in your community today?
(Population, units, price points)

How would you describe the greatest community development needs in your community today?

How would you describe the greatest economic development needs in your community today?

What are your most pressing infrastructure needs?

How would your answers have been different if we were having this conversation before COVID?

If we were getting together a year ago, in October 2019, how would you have described your local or regional economy? Steady? Growing or shrinking?

Recovery

What is your priority in getting to recovery from a community development, economic development, perspective?

Over the next five years, what investments should Business Oregon and OHCS be making locally to help with recovery?

How or do we rebuild?

What's the five year plan, vs. today?

If not already discussed

How would you describe the extent of digital inclusion or broadband access in [the community] in general? How would your description change if focused on residents who historically have not had access (e.g., very low income households)?

Have prevention and/or mitigation strategies been put into place for the people that you work with to reduce the risk of damage from future natural disasters or hazards?

Are any groups of people that you work with:

- Less prepared for future disasters or hazards (e.g., do some groups of people live where there is less investment or historic underinvestment in mitigation)?
- Less able to respond to future disasters or hazards?
- Less able to recover from future disasters or hazards?

Is there anything else that you would like to mention that would contribute to greater natural disaster/hazard prevention or response in the region?

Homelessness

1. How would you describe the state of homelessness in [community]?
2. What do you consider to be the biggest challenges in securing housing for the residents that you work with who are experiencing homelessness?
3. Are the existing supportive services adequate in meeting your clients' needs?
4. What are the most significant contributing factors to homelessness in [community]?
5. What are the most significant barriers to homeless households in accessing housing and services (e.g., transportation, lack of awareness of resources available, eligibility issues, capacity/lack of resources)?
6. Are there particular groups within the homeless population that you feel are more vulnerable than others?
7. Is there anything else that you would like to mention that would make the region more effective at preventing and ending homelessness?

Broadband Access/Digital Inclusion

[Show MA-45 table](#)

1. How would you describe the extent of digital inclusion or broadband access in [the community] in general? How would your description change if focused on residents who historically have not had access (e.g., very low income households)?
2. Is broadband wiring and connection available to residents that you work with in all areas of [community]?
 - If/when broadband service exists, do the people you work with have access to the necessary hardware (computers, smartphones, etc) to utilize the service?
 - If/when broadband service exists, do the people you work with have the necessary skills to utilize the service?
3. Do people in all areas of the region have access to more than one option for broadband service provider?
4. Can the people you work with afford to pay for broadband service?
5. Are there any programs in place to subsidize or discount broadband service for people who you work with in [community]?
6. Is lack of broadband service a barrier to finding or keeping a job for the people you work with?
7. Is lack of broadband service a barrier to success in school for the people you work with?
8. In your opinion, what are the biggest issues contributing to a digital divide in the region?
9. Is there anything else that you would like to mention that would contribute to greater digital inclusion in the region?

Disaster Recovery/Mitigation/Resilience

1. Have any of the people that you work with experienced damage to their housing from the natural disasters (e.g., floods, fires, earthquakes) and/or other hazards?
 - If so, what type of damage was sustained?
 - What was the impact of this damage?
 - Were any groups of people that you work with disproportionately impacted by the consequences of this damage?
2. Did any of the people that you work with apply for relief funding as a result of the damage?

- If so, can you walk me through what that process is like?
 - How did the process go (were there any complications encountered) for the people that you work with?
 - Were any groups of people that you work with disproportionately impacted by complications in the relief funding process?
3. Have prevention and/or mitigation strategies been put into place for the people that you work with to reduce the risk of damage from future natural disasters or hazards?
4. Are any groups of people that you work with:
- Less prepared for future disasters or hazards (e.g., do some groups of people live where there is less investment or historic underinvestment in mitigation)?
 - Less able to respond to future disasters or hazards?
 - Less able to recover from future disasters or hazards?

Is there anything else that you would like to mention that would contribute to greater natural disaster/hazard prevention or response in the region?

APPENDIX F.

CDBG PROPOSED METHOD OF DISTRIBUTION



Community Development Block Grant

2021

Method of Distribution

This method of Distribution is adopted as part of Oregon Administrative Rule (OAR) 123-080-0030 (3) by reference.



Oregon Business Development Department

775 Summer Street NE, Suite 200
Salem, OR 97301-1280

Phone: (503) 986-0123

TTY: 1-800-735-2900

Fax: (503) 581-5115

<http://www.orinfrastructure.org>

Updated May 31, 2021
Pending HUD approval

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Introduction

Administration of State of Oregon CDBG Program

Business Oregon (department) 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) 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 household size). "Moderate income" means income equal to or less than 80 percent of the area median (adjusted by household size). Applicable income limits are determined by HUD on an annual basis for all Oregon counties and metropolitan statistical areas.

Business Oregon's Mission is prosperity for all Oregonians. We endeavor to achieve that mission through our vision to invest in Oregon businesses, communities, and people to promote a globally competitive, diverse, and inclusive economy.

Method of Distribution (MOD)

Oregon's 2021 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 2021 program year that begins January 1, 2021, are described within this 2021 Method of Distribution.

The state expects to receive approximately \$13 million in new federal funds during 2021 for grants to non-entitlement cities and counties for eligible projects.

The CDBG funds covered by this Method of Distribution include 2021 funds and may include unobligated funds from a prior 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 2020 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 Business Oregon for more information at 503-986-0123

Commonly Used Acronyms

ADA	Americans with Disabilities Act
AOC	Association of Oregon Counties
ART	Application Ranking Team
BOLI	Bureau of Labor and Industries
CDBG	Community Development Block Grant
CF	Community-type Facilities
CFR	Code of Federal Regulations
CV	CARES Act
CWA	Clean Water Act
DEQ	Department of Environmental Quality
DOL	U.S. Department of Labor
EA	Environmental Assessment
EO	Executive Order (Federal)
ERR	Environmental Review Record
HCDA	Housing and Community Development Act
HRRLF	Housing Rehabilitation Revolving Loan Fund
HUD	U.S. Department of Housing and Urban Development
LEP	Limited English Proficiency
LOC	League of Oregon Cities
MOU	Memorandum of Understanding
NEPA	National Environmental Policy Act
OAR	Oregon Administrative Rule
OMB	Office of Management and Budget (Federal)
ORS	Oregon Revised Statutes
PA	Pre-application
PDT	Project Development Team
PPC	Program and Policy Coordinator
PW	Public Works
RDO	Regional Development Officer
RE	Responsible Entity
ROF	Release of Funds
RPM	Regional Project Manager
RROF	Request for Release of Funds
SDWA	Safe Drinking Water Act
SHPO	State Historic Preservation Office
TDD	Telecommunication Device for the Deaf
THPO	Tribal Historic Preservation Office
URA	Uniform Relocation Assistance and Real Property Acquisition Policies Act

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 2021-2025 State of Oregon Consolidated Plan for Housing and Community Development. The 2021-2025 Consolidated Plan has been approved by the U.S. Department of Housing and Urban Development (HUD). The 2021 Method of Distribution is the fourth annual update to the 2021-2025 Consolidated Plan and has been developed with participation from HUD, Business Oregon 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 2021 are described within the 2021 Method of Distribution (MOD). In accordance with the HCDA the state will consider applications for funding consistent with the identified funding priorities within the 2021 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) that will be eligible for funding under the state's program. These priorities are described within the 2021 MOD. The priorities eligible for funding under Oregon's 2021 Community Development Block Grant program are:

Programs offered through Business Oregon

1. **Economic Development:**
 - a. **Microenterprise Assistance Public Services:** Technical Assistance, recruitment, screening and providing classroom training to microenterprise owners and persons developing microenterprises.
 - b. **Downtown Revitalization**
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% of the yearly funding allocation), the department intends to award available new 2021 funds, unobligated prior year funds, program income (if any) and recaptured grant funds from prior year grants to projects in the following categories: Public Works (53%) (Design Only or Construction Only), Regional Housing Rehabilitation (25%), Community/Public Facilities (20%), and Economic Development (2%). Please note, no more 30% of the Public Works allocation will be awarded to design-only projects.

The projected annual allocation for 2021 is \$13,632,859. After deducting the allowable state administration funds and the State Technical Assistance 1% set aside, Business Oregon will have approximately \$13,123,873 available to fund projects. Based on current funding priorities and allocation percentages, the breakdown would be as follows: Public Works - \$6,955,653; Regional Housing Rehabilitation - \$3,280,968; Community/Public Facilities - \$2,624,775; and Microenterprise Assistance - \$262,477. The table below reflects the actual funding received in 2020, the projected funding for 2021 and the targeted allocations for the project funding categories.

Funding Information	2020	Target %	2021	Target %
Annual Allocation from HUD	\$13,632,859		\$12,303,168 (Note 1)	
State Administration 2% (The required match for these funds comes from the Special Public Works Fund (SPWF).	272,657		246,063 (Note 2)	
State Administration \$100,000—no match funds	100,000	N/A	100,000	
State Technical Assistance Set-Aside 1%	136,329		123,032	
Annual Allocation Available for Projects	\$13,123,873		\$11,834,073	
Program Income	\$0		\$0	
Recaptured Funds (Note 3)	\$0		100,000	
ESTIMATED TOTAL AVAILABLE FOR PROJECTS	\$12,667,460		\$11,834,073 (Note 4)	
Public Works (Note 5)	\$6,955,653	53%	\$6,272,059	53%
Regional Housing Rehabilitation	\$3,280,968	25%	\$2,958,518	25%
Community/Public Facilities	\$2,624,775	20%	\$2,366,815	20%
Microenterprise Assistance	\$262,477	2%	\$236,681	2%

Note 1 Total 2021 Projected CDBG allocation

Note 2 When received, program income is allocated to projects using the target percentages identified above, after taking 2% for state administration.

Note 3 Actual as of December, 2020.

Note 4 Unobligated amounts from 2020 will be added to this figure.

Note 5 No more than 30% of the Public Works allocation will be awarded to design only projects.

Target Funding

Business Oregon has no control over the type and quantity of applications submitted for funding under the program. Therefore, after each calendar quarter Business Oregon conducts a regular 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. On a yearly basis, at a minimum, Business Oregon will conduct a target review to determine if funds need to be moved from one category to another to address program needs.

Program Year (PY)

The state of Oregon's 2021 program year is from January 1 thru December 31, 2021.

Funds Remaining after December 31, 2019

On January 1, 2021, any un-obligated or recaptured PY2020 funds, earlier program year funds or program income will be applied in conformance with the HUD approved PY 2021 target percentages and will be awarded in accordance with either the proposed or HUD approved 2021 Method of Distribution.

Recaptured Funds and Program Income

The state anticipates not receiving any program income or recaptured funds in the 2021 program year. If the state does receive any recaptured funding due to projects or programs are completed under budget those funds will be allocated in the 2022 program year.

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 are 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.

Compliance Requirements:

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 Business Oregon prioritizes its obligation and announcement of CDBG funds as follows:

- 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));
- 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 2021 Method of Distribution. Funds received after December 31, 2020, 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.

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, Marion) are not included in the state's 2021 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, within this Chapter, lists each city and county that may be eligible to apply for 2021 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 project funding where the project to be constructed will be owned and operated by another eligible applicant, and 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, regionalized food bank warehouse/distribution facility and regional microenterprise assistance programs.

Note: If the project overlaps municipal boundaries, attach a draft of an intergovernmental cooperation agreement that lays out the duties and obligations of each entity. If the project benefits a region such as a housing rehabilitation, micro-enterprise or regionalized food-bank facility projects, attach an executed participation agreement between the jurisdictions that are benefitting from the project.

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 facility now, and then building the remaining portion later, in order to qualify for two grants for the same facility.

Low- and Moderate- Income Data

Periodically, HUD provides the state with updated Low- and Moderate-Income Statistical Data (LMISD). This data, reflected in the table to follow, reflects the percentages of low and moderate income persons within a specific statistical area. Part of the criteria for CDBG funding eligibility for an area-wide project is the jurisdiction must be 51% or more LMI. For further information or assistance on the Table below, please contact one of the agency's Regional Development Officers.

Table A–2020 Low- and Moderate-Income Data

City/County	2020 LMISD	City/County	2020 LMISD	City/County	2020 LMISD
Baker County	40.71%	Deschutes County	38.85%	Jacksonville	29.20%
Baker City	45.08%	La Pine	60.98%	Phoenix	47.87%
Greenhorn	0.00%	Sisters	42.41%	Rogue River	52.87%
Haines*	56.40%	Douglas County	41.75%	Shady Cove	62.27%
Halfway	63.49%	Canyonville	54.78%	Talent	48.07%
Huntington	52.31%	Drain*	52.30%	Jefferson County	41.39%
Richland	68.57%	Elkton	51.11%	Culver	36.17%
Sumpter	57.14%	Glendale	58.75%	Madras	54.09%
Unity	40.00%	Myrtle Creek	48.01%	Metolius	61.50%
Benton County	48.68%	Oakland	47.10%	Josephine County	46.16%
Adair Village	43.98%	Reedsport	57.56%	Cave Junction	63.57%
Monroe	63.70%	Riddle	50.00%	Klamath County	43.37%
Philomath	49.62%	Roseburg	40.27%	Bonanza	62.38%
Clatsop County	41.53%	Sutherlin	49.65%	Chiloquin	77.30%
Astoria	43.15%	Winston	47.43%	Klamath Falls	47.92%
Cannon Beach	40.89%	Yoncalla	45.89%	Malin	55.48%
Gearhart	41.44%	Gilliam County	45.16%	Merrill	47.73%
Seaside	57.38%	Arlington	48.74%	Lake County	50.07%
Warrenton	46.47%	Condon	49.07%	Lakeview	50.40%
Columbia County	46.36%	Lonerock	75.00%	Paisley	37.68%
Clatskanie	56.34%	Grant County	41.10%	Lane County	43.25%
Columbia City	44.31%	Canyon City	36.36%	Coburg	33.04%
Prescott	27.27%	Dayville	36.67%	Cottage Grove	47.92%
Rainier	57.65%	Granite	80.00%	Creswell	35.86%
Scappoose	36.90%	John Day *	57.3% *	Dunes City	31.23%
St. Helens	51.65%	Long Creek	34.29%	Florence	49.73%
Vernonia	51.05%	Monument*	56.90%	Junction City	50.09%
Coos County	42.67%	Mt. Vernon*	58.40%	Lowell	36.70%
Bandon	50.33%	Prairie City	49.36%	Oakridge	47.58%
Coos Bay	45.22%	Seneca*	56.60% *	Veneta	45.48%
Coquille	56.64%	Harney County	47.27%	Westfir	53.57%
Lakeside	40.52%	Burns	54.15%	Lincoln County	39.66%
Myrtle Point	36.25%	Hines	36.73%	Depoe Bay	32.53%
North Bend	39.71%	Hood River County	34.93%	Lincoln City	45.55%
Powers	67.11%	Cascade Locks	61.43%	Newport	43.89%
Crook County	45.91%	Hood River	41.96%	Siletz	54.76%
Prineville	55.33%	Jackson County	42.26%	Toledo	38.70%
Curry County	41.09%	Butte Falls	54.55%	Waldport	45.10%
Brookings	39.00%	Central Point	36.77%	Yachats	33.33%
Gold Beach	39.43%	Eagle Point	40.98%		
Port Orford	56.15%	Gold Hill	46.86%		

*Indicates results of income surveys conducted in accordance with CDBG requirements. Income Survey results are valid for five years from the date the survey was completed.

Table A–2020 Low- and Moderate-Income Data

City/County	2020 LMISD	City/County	2020 LMISD	City/County	2020 LMISD
Linn County	41.77%	Rockaway Beach	40.98%	Yamhill County	49.42%
Brownsville	35.26%	Tillamook	52.59%	Amity*	54.22% *
Halsey	35.84%	Wheeler	53.62%	Carlton	44.12%
Harrisburg	42.08%	Umatilla County	38.62%	Dayton	52.76%
Idanha*	70.00%	Adams	24.32%	Dundee	37.99%
Lebanon	49.76%	Athena	42.45%	Lafayette	51.90%
Lyons	28.94%	Echo	37.41%	McMinnville	55.34%
Mill City	47.19%	Helix	39.02%	Newberg	52.92%
Millersburg	25.68%	Hermiston	43.29%	Sheridan	71.76%
Scio	33.13%	Milton Freewater	57.73%	Willamina	55.43%
Sodaville	34.25%	Pendleton	36.04%	Yamhill	32.59%
Sweet Home	47.96%	Pilot Rock	43.05%		
Tangent	43.35%	Stanfield	40.18%		
Waterloo	18.87%	Ukiah	50.00%		
Malheur County	47.19%	Umatilla*	54.7%		
Adrian*	57.22%	Weston	37.93%		
Jordan Valley	45.16%	Union County	42.67%		
Nyssa	44.22%	Cove	44.63%		
Ontario	57.88%	Elgin	47.21%		
Vale*	62.45%	Imbler	26.98%		
Morrow County	36.60%	Island City	42.24%		
Boardman	49.55%	LaGrande	44.55%		
Heppner	46.29%	North Powder	71.84%		
Ione	35.29%	Summerville	18.75%		
Irrigon	33.18%	Union	51.12%		
Lexington	28.95%	Wallowa County	39.52%		
Polk County	35.61%	Enterprise	39.62%		
Dallas	40.82%	Joseph	48.28%		
Falls City*	53.77%	Lostine	36.51%		
Independence	48.57%	Wallowa	62.14%		
Monmouth	50.46%	Wasco County	38.80%		
Willamina	55.43%	Antelope	100.00%		
Sherman County	46.15%	Dufur	39.06%		
Grass Valley	63.64%	Maupin	37.72%		
Moro	59.46%	Mosier	41.05%		
Rufus	56.25%	Shaniko	100.00%		
Wasco	56.98%	The Dalles	40.58%		
Tillamook County	39.37%	Wheeler County	44.32%		
Bay City	35.15%	Fossil	46.15%		
Garibaldi	43.87%	Mitchell	58.33%		
Manzanita	37.65%	Spray	61.54%		
Nehalem	23.53%				

*Indicates results of income surveys conducted in accordance with CDBG requirements. Income Survey results are valid for five years from the date the survey was completed.

Limits on Applications

To assist the state in complying with federal requirements pertaining to the timely distribution and expenditure of funds the 2021 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 Pre-application (PA) approved from a city or county with three or more open grants. This includes jurisdictional grants, i.e. housing rehabilitation.

Age and Expenditure of Funds Requirements

1. City/County—Before an application is invited or a PA 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 –Age and expenditure table

One Year Grants (microenterprise assistance) After contract execution date	Requirement	Multi-Year Grants (All other grants) After contract execution date	Requirement
1 year old	Microenterprise Grants —70% of the funds must be drawn down	1 years old	60% of the funds must be drawn down
2 years old or more	Microenterprise Grants —The jurisdiction is ineligible to apply for any new grant unless this project is administratively closed	2 years old	100% of the funds must be drawn down
		3 years old or more	The jurisdiction is ineligible to apply for any new grant unless this project is administratively closed.

2. Microenterprise Assistance Service Provider—a service provider administering a microenterprise assistance program on behalf of a grant recipient, which includes the entire service area of the microenterprise assistance 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, microenterprise service provider 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 microenterprise assistance program, which includes the entire service area, be awarded.

3. Housing rehabilitation projects are exempt from this requirement

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
- 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 that 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.

Exceptions will be granted at the sole discretion of the Business Oregon after a thorough review by Business Oregon 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 it administers are spent for projects that meet this objective.
- **Urgent Need**–This must be a bona fide emergency declared by the Governor or President of the United States. 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. The community must be able to document there is no financial ability to repair the threat.

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 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)

1. 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.
2. Units of general local government may (UGLG), 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 Business Oregon.
3. An activity that serves an area that is not primarily residential in character will not qualify under this criterion, as determined by Business Oregon.
4. 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 2020 Low and Moderate Income Survey Data (LMISD) data. See Table A in Chapter 2 of this handbook.

Applicants for area-wide benefit projects that have been determined to be eligible activities for funding under the CDBG program by Business Oregon 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–2020 LMISD (effective April 1, 2019) data shows that less than 51 percent 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–2020 LMISD (effective April 1, 2019) data shows that less than 51 percent 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; or
- 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 2020 LMISD data was derived from 2010-2015 American Community Survey (ACS) data and published by HUD in March 2016. For example, a community with a substantial increase in population and new housing construction after 2012 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 2020 LMISD to the most current 2013 Portland State University (PSU) population estimate issue in the 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 Business Oregon Regional Development Officer (RDO) **prior to beginning the survey**.

Business Oregon-approved income surveys will be valid and usable for up to five (5) years, after approval. If economic, non-economic or demographic changes occur during this five (5)-year period that 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 Business Oregon 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 updated or revised LMISD data is published by HUD, the most current 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—The activity **must exclusively** serve a group of persons in any one or a combination of the following categories whose income meets the low to moderate test:

- **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 considered disabled by Medicare or receive Supplemental Social Security Income (SSI) are considered to have a disability (severe disability).
- **Homeless persons**—Individual or family who lacks a fixed, regular, and adequate nighttime residence, meaning:
 - a. Has a primary nighttime residence that is a public or private place not meant for human habitation;
 - b. Is living in a publicly or privately operated shelter designated to provide temporary living arrangements (including congregate shelters, transitional housing, hotels, and motels paid for by charitable organizations or by federal, state, and local government programs); or
 - c. Is exiting an institution where (s)he has resided for 90 days or less and who resided in an emergency shelter or place not meant for human habitation immediately before entering that institution.
- **Illiterate adults;**
- **Persons living with AIDS;** and
- **Migrant farm workers.**

Test 2—Limited Clientele Based on Household Size and Income Eligibility—If the facility does not serve a clientele that consists exclusively of presumed low- and moderate-income persons, it must:

- Require information on household size and income from every client so that it is evident that at least 51 percent of the clientele are persons whose household 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
- Have income eligibility requirements that limit the activity exclusively to low- and moderate-income persons; or

Test 3—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 household 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 household 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:

- **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: 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

- **Test 2–Limited Clientele Based on Household Size and Income**

Documentation that at least 51 percent of the clientele are persons whose household 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 household incomes above and below the low- and moderate-income limits. The summary must be based on information about the household size and household 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 each member of the household. If a household 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 household 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
- c. 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

- d. **Test 3–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 household 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 percent 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 funded through programs monitored by Oregon Housing and Community Services or HOME-assisted and the requirements of 24 cfr 92.252 or 24 cfr 92.254 of this title are met.

Housing Documentation (LMH)

For each activity carried out for the purpose of rehabilitating or constructing housing that 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 are compared against the household 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 that 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 18 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 carry out 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

Type of National Objective	Definition of National Objective
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.)
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 years of age and older, Homeless Shelters, Domestic Violence Shelters, etc.
Household 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 Household Size and Income and Test 3 – Limited Clientele based on Income Eligibility.	Definition – Activities require information on household size and income that confirm at least 51% of clientele are low- and moderate- income. Information on household size and income can be determined by clients completing the Community Facility User Certification Form (Test 2) or have 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.
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/or occupied by low- and moderate- income persons. All applicants must household size and income qualify. Example: housing rehabilitation.
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 – 2020 Low and Moderate Income Limits

Effective April 2020 - Income Limits by Household Size

Periodically, HUD provides the state with updated Low- and Moderate Income Limits by household size. This data, reflected in the table to follow, reflects the income limits per household size by County. For further information or assistance on the Table below, please contact one of the agency's Regional Development Officers.

County	Median Household Income estimate for 2020	Income Level Note 1	1-Person Household	2-Person Household	3-Person Household	4-Person Household	5-Person Household	6-Person Household	7-Person Household	8-Person Household
Baker	\$58,100	Low	\$21,500	\$24,600	\$27,650	\$30,700	\$33,200	\$35,650	\$38,100	\$40,550
		Moderate	\$34,400	\$39,300	\$44,200	\$49,100	\$53,050	\$57,000	\$60,900	\$64,850
Benton Note 2	\$81,000	Low	\$28,350	\$32,400	\$36,450	\$40,500	\$43,750	\$47,000	\$50,250	\$53,500
		Moderate	\$45,400	\$51,850	\$58,350	\$64,800	\$70,000	\$75,200	\$80,400	\$85,550
Clatsop	\$70,600	Low	\$24,450	\$27,950	\$31,450	\$34,900	\$37,700	\$40,500	\$43,300	\$46,100
		Moderate	\$39,100	\$44,700	\$50,300	\$55,850	\$60,350	\$64,800	\$69,300	\$73,750
Columbia Note 3	\$87,900	Low	\$32,250	\$36,850	\$41,450	\$46,050	\$49,750	\$53,450	\$57,150	\$60,800
		Moderate	\$51,600	\$59,000	\$66,350	\$73,700	\$79,600	\$85,500	\$91,400	\$97,300
Coos	\$53,400	Low	\$21,500	\$24,600	\$27,650	\$30,700	\$33,200	\$35,650	\$38,100	\$40,550
		Moderate	\$34,400	\$39,300	\$44,200	\$49,100	\$53,050	\$57,000	\$60,900	\$64,850
Crook	\$56,800	Low	\$21,500	\$24,600	\$27,650	\$30,700	\$33,200	\$35,650	\$38,100	\$40,550
		Moderate	\$34,400	\$39,300	\$44,200	\$49,100	\$53,050	\$57,000	\$60,900	\$64,850
Curry	\$59,200	Low	\$21,500	\$24,600	\$27,650	\$30,700	\$33,200	\$35,650	\$38,100	\$40,550
		Moderate	\$34,400	\$39,300	\$44,200	\$49,100	\$53,050	\$57,000	\$60,900	\$64,850
Deschutes Note 2	\$76,600	Low	\$26,850	\$30,650	\$34,500	\$38,300	\$41,400	\$44,450	\$47,500	\$50,600
		Moderate	\$42,950	\$49,050	\$55,200	\$61,300	\$66,250	\$71,150	\$76,050	\$80,950
Douglas	\$59,600	Low	\$21,900	\$25,000	\$28,150	\$31,250	\$33,750	\$36,250	\$38,750	\$41,250
		Moderate	\$35,000	\$40,000	\$45,000	\$50,000	\$54,000	\$58,000	\$62,000	\$66,000
Gilliam	\$59,100	Low	\$21,500	\$24,600	\$27,650	\$30,700	\$33,200	\$35,650	\$38,100	\$40,550
		Moderate	\$34,400	\$39,300	\$44,200	\$49,100	\$53,050	\$57,000	\$60,900	\$64,850
Grant	\$60,800	Low	\$21,500	\$24,600	\$27,650	\$30,700	\$33,200	\$35,650	\$38,100	\$40,550
		Moderate	\$34,400	\$39,300	\$44,200	\$49,100	\$53,050	\$57,000	\$60,900	\$64,850
Harney	\$53,300	Low	\$21,500	\$24,600	\$27,650	\$30,700	\$33,200	\$35,650	\$38,100	\$40,550
		Moderate	\$34,400	\$39,300	\$44,200	\$49,100	\$53,050	\$57,000	\$60,900	\$64,850
Hood River	\$71,700	Low	\$25,100	\$28,700	\$32,300	\$35,850	\$38,750	\$41,600	\$44,500	\$47,350
		Moderate	\$40,150	\$45,900	\$51,650	\$57,350	\$61,950	\$66,550	\$71,150	\$75,750
Jackson Note 2	\$65,100	Low	\$22,800	\$26,050	\$29,300	\$32,550	\$35,200	\$37,800	\$40,400	\$43,000
		Moderate	\$36,500	\$41,700	\$46,900	\$52,100	\$56,300	\$60,450	\$64,650	\$68,800
Jefferson	\$60,700	Low	\$21,500	\$24,600	\$27,650	\$30,700	\$33,200	\$35,650	\$38,100	\$40,550
		Moderate	\$34,400	\$34,400	\$44,200	\$49,100	\$53,050	\$57,000	\$60,900	\$64,850
Josephine	\$57,800	Low	\$21,700	\$24,800	\$27,900	\$31,000	\$33,500	\$36,000	\$38,450	\$40,950
		Moderate	\$34,750	\$39,700	\$44,650	\$49,600	\$53,600	\$57,550	\$61,550	\$65,500
Klamath	\$53,100	Low	\$21,500	\$24,600	\$27,650	\$30,700	\$33,200	\$35,650	\$38,100	\$40,550
		Moderate	\$34,400	\$39,300	\$44,200	\$49,100	\$53,050	\$57,000	\$60,900	\$64,850

County	Median Household Income estimate for 2020	Income Level Note 1	1-Person Household	2-Person Household	3-Person Household	4-Person Household	5-Person Household	6-Person Household	7-Person Household	8-Person Household
Lake	\$44,700	Low	\$21,500	\$24,600	\$27,650	\$30,700	\$33,200	\$35,650	\$38,100	\$40,550
		Moderate	\$34,400	\$39,300	\$44,200	\$49,100	\$53,050	\$57,000	\$60,900	\$64,850
Lane Note 2	\$72,200	Low	\$24,500	\$28,000	\$31,500	\$35,000	\$37,800	\$40,600	\$43,400	\$46,200
		Moderate	\$39,200	\$44,800	\$50,400	\$56,000	\$60,500	\$65,000	\$69,450	\$73,950
Lincoln	\$55,800	Low	\$21,500	\$24,600	\$27,650	\$30,700	\$33,200	\$35,650	\$38,100	\$40,550
		Moderate	\$34,400	\$39,300	\$44,200	\$49,100	\$53,050	\$57,000	\$60,900	\$64,850
Linn	\$64,500	Low	\$22,600	\$25,800	\$29,050	\$32,250	\$34,850	\$37,450	\$40,000	\$42,600
		Moderate	\$36,150	\$41,300	\$46,450	\$51,600	\$55,750	\$59,900	\$64,000	\$68,150
Malheur	\$49,500	Low	\$21,500	\$24,600	\$27,650	\$30,700	\$33,200	\$35,650	\$38,100	\$40,550
		Moderate	\$34,400	\$39,300	\$44,200	\$49,100	\$53,050	\$57,000	\$60,900	\$64,850
Marion Note 3	\$70,600	Low	\$24,750	\$28,250	\$31,800	\$35,300	\$38,150	\$40,950	\$43,800	\$46,600
		Moderate	\$39,550	\$45,200	\$56,500	\$56,500	\$61,050	\$65,550	\$70,100	\$74,600
Morrow	\$63,200	Low	\$22,150	\$25,300	\$28,450	\$31,600	\$34,150	\$36,700	\$39,200	\$41,750
		Moderate	\$35,400	\$40,450	\$45,500	\$50,550	\$54,600	\$58,650	\$62,700	\$66,750
Polk Note 3	\$70,600	Low	\$24,750	\$28,250	\$31,800	\$35,300	\$38,150	\$40,950	\$43,800	\$46,600
		Moderate	\$39,550	\$45,200	\$56,500	\$56,500	\$61,050	\$65,550	\$70,100	\$74,600
Sherman	\$69,500	Low	\$24,350	\$27,800	\$31,300	\$34,750	\$37,550	\$40,350	\$43,100	\$45,900
		Moderate	\$38,950	\$44,500	\$50,050	\$55,600	\$60,050	\$64,500	\$68,950	\$73,400
Tillamook	\$58,500	Low	\$21,500	\$24,600	\$27,650	\$30,700	\$33,200	\$35,650	\$38,100	\$40,550
		Moderate	\$34,400	\$39,300	\$44,200	\$49,100	\$53,050	\$57,000	\$60,900	\$64,850
Umatilla	\$65,300	Low	\$22,900	\$26,150	\$29,400	\$32,650	\$35,300	\$37,900	\$40,500	\$43,100
		Moderate	\$36,600	\$41,800	\$47,050	\$52,250	\$56,450	\$60,650	\$64,800	\$69,000
Union	\$58,900	Low	\$21,500	\$24,600	\$27,650	\$30,700	\$33,200	\$35,650	\$38,100	\$40,550
		Moderate	\$34,400	\$39,300	\$44,200	\$49,100	\$53,050	\$57,000	\$60,900	\$64,850
Wallowa	\$64,400	Low	\$22,300	\$25,450	\$28,650	\$31,800	\$34,350	\$36,900	\$39,450	\$42,000
		Moderate	\$35,650	\$40,750	\$45,850	\$50,900	\$55,000	\$59,050	\$63,150	\$67,200
Wasco	\$58,900	Low	\$23,350	\$26,700	\$30,050	\$33,350	\$36,050	\$38,700	\$41,400	\$44,050
		Moderate	\$37,350	\$42,700	\$48,050	\$53,350	\$57,650	\$61,900	\$66,200	\$70,450
Wheeler	\$53,100	Low	\$21,500	\$24,600	\$27,650	\$30,700	\$33,200	\$35,650	\$38,100	\$40,550
		Moderate	\$34,400	\$39,300	\$44,200	\$49,100	\$53,050	\$57,000	\$60,900	\$64,850
Yamhill Note 3	\$92,100	Low	\$32,250	\$36,850	\$41,450	\$46,050	\$49,750	\$53,450	\$57,150	\$60,800
		Moderate	\$51,600	\$59,000	\$66,350	\$73,700	\$79,600	\$85,500	\$91,400	\$97,300

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 household with a gross income of no more than 50 percent of the area median income. A Moderate-Income person is a member of a household 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 2017 estimated median household income for non-metropolitan counties in Oregon is \$53,300.

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 household 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 and Springfield in Lane County, Albany in Linn County, Medford and 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 household income for the entire PMSA including local governments that are not eligible for the state-administered CDBG program. For example, the median household 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

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 2021 Method of Distribution, and in a format similar to the tables below in point #5.

Note: Do not duplicate beneficiary reporting. Each user of the service can only be counted once per calendar year.

Instructions:

- 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.
- Attach a copy of Facility User Certification Form(s) (intake or client screening forms) containing the requisite household size and income limits for the clientele in each program.
- 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.
- Prospective applicants are encouraged to consult with department staff at the earliest stages of project development concerning the documentation required for Limited Clientele Projects.
- Identify the race and ethnicity of the total beneficiary’s services by the facility during the reporting period.

Race/Ethnicity of Persons Benefiting from Project: Must match total reported on Documentation of Facility Users Form

Race:	Total #	Ethnicity: # of Hispanic
White		
Black/African American		
Asian		
American Indian/Alaskan Native		
Native Hawaiian/Other Pacific Islander		
American Indian/Alaskan Native & White		
Asian & White		
Black/African American & White		
American Indian/Alaska Native & Black/African American		
Other Multi-Racial		
Total Number of Persons Benefiting from Project		

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
	<p>___ Household size and income information are collected from all clientele and at least 51% are LMI. (2)</p> <p>___ Clientele must be LMI to receive service. (2)</p> <p>___ Clientele are presumed to be LMI. Classification _____ (3)</p> <p>___ Clientele are LMI by Nature and Location of Facility.</p>				
	<p>___ Household size and income information are collected from all clientele and at least 51% are LMI. (2)</p> <p>___ Clientele must be LMI to receive service. (2)</p> <p>___ Clientele are presumed to be LMI. Classification _____ (3)</p> <p>___ Clientele are LMI by Nature and Location of Facility.</p>				
	<p>___ Household size and income information are collected from all clientele and at least 51% are LMI. (2)</p> <p>___ Clientele must be LMI to receive service. (2)</p> <p>___ Clientele are presumed to be LMI. Classification _____ (3)</p> <p>___ Clientele are LMI by Nature and Location of Facility.</p>				
	<p>___ Household size and income information are collected from all clientele and at least 51% are LMI. (2)</p> <p>___ Clientele must be LMI to receive service. (2)</p> <p>___ Clientele are presumed to be LMI. Classification _____ (3)</p> <p>___ Clientele are LMI by Nature and Location of Facility.</p>				
TOTALS					
PERCENTAGE (LMI users)/(total users) X 100 = %		% LMI		% LMI	

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 household size and income and ethnicity/race of the persons who use the __ [insert name of facility] _____. Your answers will be treated confidentially.

HOUSEHOLD SIZE—All persons living in the same household.

NOTE: 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 Facility User Certification Form.

Check the appropriate box for your household size:

- Single individual
- Household of 2
- Household of 3
- Household of 4
- Household of 5
- Household of 6
- Household of 7
- Household of 8 or more

Annual Household Income—Total income earned before taxes (gross) by all household 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 household members.

Check the appropriate box for your **household's annual total gross income *before taxes* for the most recent tax reporting year.**

	Annual Gross Income		Annual Gross Income
	\$0 to \$27,050		\$41,751 to \$44,800
	\$27,051 to \$30,900		\$44,801 to \$47,900
	\$30,901 to \$34,800		\$47,901 to \$51,000
	\$34,651 to \$41,750		\$51,000 or more
	\$44,801 to \$47,900		

The household income figures must be updated for the county in which the project is to occur.

Race and Ethnicity — As a person using a facility funded by an Oregon Community Development Block Grant, you are asked to **voluntarily** respond to the race and ethnicity 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 race and ethnicity.

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
- American Indian/Alaskan Native & White
- Asian & White
- Black/African American & White
- American Indian/Alaska Native & Black/African American
- Other Multi-Racial

Signatures and Certifications—This information is subject to verification by the grant recipient, Business Oregon or the U.S. Department of Housing and Urban Development officials.

- **Facility User** (Person that completed this form)—By my signature below on this Facility User Certification Form, I am certifying that the information provided is valid and accurate.

Signature

Date

- **Public Facility Organization** (Entity that collected the information from the user)—The **[Insert the name of organization collecting household 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

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Chapter 4 – Federal Requirements

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 Business Oregon. The CDBG Grant Management Handbook can be found on the [Department's website](#). Business Oregon 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.
- 1. **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.
- 2. **Exceptions to the Conflict of Interest Requirements**–Business Oregon 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**: Business Oregon'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 Business Oregon prior to taking any action. More specifically, the requirements are:

- All projects having improved or acquired real property within the grant recipients' direct control (including activities undertaken by sub-grantees) that 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 subrecipient (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 administratively closed out with the state.
- **Trust Deed**— 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 a 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.

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 \(ORPIN\)](#) or Business Oregon's [Certification Office for Business Inclusion and Diversity \(COBID\)](#) can be used for advertising procurement contracts.

Non-Discrimination Against Persons with Disabilities

Federal law prohibits discrimination against any otherwise qualified individual from participating in or benefiting from a federally funded program solely on the basis of a disability.

Community Development Block Grant recipients must comply with U.S. Department of Housing and Urban Development regulations that 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

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).

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 Business Oregon 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 that (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 sub-granted 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.

If tenant/owner displacement has occurred, the recipient must have documentation that the notices were received by the tenant/owner when the grant application is submitted to the state, by means of certified mail return receipt or the tenant signed for the notice. Tenant/owner who did not receive their notices at the project application stage may be entitled to relocation benefits under federal law. There are many notices, depending upon the details of the situation, therefore, rather than include all types of notification in the Method of Distribution, the applicant is encouraged to use the numerous examples of notices ("guide form notices") in *HUD Handbook 1378*. These are available for download from the [HUD website](#). A wide range of samples for different situations are found in the appendices.

If an owner or tenant did not receive their notice, a complaint can be filed either by contacting the HUD Region X office or by [filing a complaint online](#).

Due to the specialty calculations and detailed requirements for relocation activities, any applicant with a proposed project that involves relocation will be required by Business Oregon to hire a specialist acceptable to Business Oregon to complete the required URA relocation process.

Note: Refer to the "Note" in Chapter 7 for a brief description of the uniform relocation and real property assistance (URA) trigger guidance. More detailed information can be found in the current Grant Management Handbook.

Residential Anti-displacement and Relocation Plan

Recipients must comply with the State of Oregon's "Residential Anti-displacement and Relocation Plan" in the Grant Management Handbook, Chapter 8, Exhibit 2A.

Proportional Funding

Proportional funding for any project is not allowed.

Example; if the County of Clatsop has an LMA project but the county is only 30% LMI CDBG cannot be used to fund 30% of the project based on LMI.

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 570.490. The department will provide technical assistance and online access to the Grant Management Handbook, which contains detailed record keeping information and information covering other aspects of the program's requirements.

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.

In-Kind value of volunteer labor for the purpose of documenting local match and prevailing wage law, 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.

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.

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Chapter 5 – Program Policies and Definitions

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 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 received 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:

$$\frac{\text{(CDBG Receipts)}}{\text{(Total Expenditures and Incurred Obligations)}} \\ \frac{\text{(\$100,000)}}{\text{(\$1,000,000)}} = 0.1 \qquad 0.1$$

Total Cost of A-133 Audit	\$5,000
---------------------------	---------

Eligible CDBG reimbursable portion of the audit cost

$$\text{(Total Audit Cost)} \times \text{(Ratio)} \\ \text{(\$5,000)} \times \text{(0.1)} = \$500 \qquad \$500$$

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 are not eligible for reimbursement under the program.

Program/Project Delivery Costs

- **Grant Administration** – For all categories that allow grant administration as an eligible activity, up to 10 percent of the grant award, but not more than \$35,000 (\$25,000 for housing rehabilitation projects) 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.

- **Federal Labor Standards Compliance** – Up to a maximum of \$20,000 per project is allowed if needed. Any amount of funds in excess of the \$20,000 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 \$20,000 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 Business Oregon. The complete record must be ready for public comment. Any amount of funds in excess of the \$20,000 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 information at the beginning of this Chapter 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 that 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 \$25,000 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 eligible clients.

Recipients that are subject to the 20 percent cap on grant administration and program management, will be allowed an additional \$20,000 on top of the 20 percent cap for grant administration and program management, allowing a maximum of \$25,000 for grant administration expenses.

Activity	Allowance
Grant Administration for Public Works and Public Facility projects only	10% up to a maximum of \$35,000
Grant Administration for Housing Rehabilitation projects only	10% up to a maximum of \$25,000
Federal Labor Standards Compliance	Up to a maximum of \$20,000 per project
Environmental Review	Up to a maximum of \$20,000 per project
Legal Fees	There is no maximum limit
Audit Costs	Refer to beginning of this Chapter for details
Limited English Proficiency Translation Services (LEP)	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% of project construction and construction contingency costs combined
Engineering	20% of project construction and construction contingency costs combined
Program Management (housing rehabilitation projects only)	Up to 20% of the requested grant, plus \$20,000. 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 Business Oregon and are limited by the amount of funds available in the recipient's grant award.	

*Refer to Table F in this Chapter 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% of project construction and construction contingency costs; and

Engineering – 20% 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 Business Oregon. 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 notification of grant award 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. Failure to gain prior approval, when needed, could result in sanctions and/or 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 **last/final** disbursement request, the recipient needs to vary from the approved budget the following procedure can be used, only for the final disbursement request:
 - 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 Business Oregon project file;
 - The final changes must be in conformance with the grant administration, engineering, environmental, program management etc. allowances identified in Chapter 5 of this MOD;
 - The costs are eligible under the CDBG program; and,

- There is written communication from the Regional Project Manager to the grant recipient in the project file, attached to the final disbursement request that “Business Oregon 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.
- **Additional Funding Request** –It is the department’s sole discretion to allow additional funding to exceed the original awarded amount if the project is able to document
 - Cost increase is a byproduct of uncontrollable variance in the project.
 - The amount requested does not exceed the maximum grant amount allowed for the respective project type.

All requests that are less than 20% or the greater of \$20,000 of the previously awarded amount will be processed as an administrative change.

All requests greater than 20% of the previously awarded amount will be required to submit an application for the additional funding in the next funding cycle.

The department Director or Assistant Director has the authority to designate/assign grant contract amendment approval authority.

Mixed Use Facilities

A 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, **except** 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 timeframe 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.

A district or nonprofit that owns a public improvement that provide a service to an area or LMI clients can be owned or operated by a non-profit if there is a trust deed or recorded agreement covering the five-year restriction on change of use/continued use requirements. However during the construction/rehabilitation the UGLG must own the facility and can, upon project completion, quit claim the property to the non-profit. Community Centers must always be owned by the UGLG and cannot be deeded to a non-profit.

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:

Financial Assessment:

- . Applications must contain clear and convincing documentation that funds are secured and readily available for the project (i.e., Commitment letter or, for Business Oregon internal funding programs, a signed staff recommendation).
- If the applicant has received a conditional commitment from a funder, the applicant must request a waiver to Business Oregon prior to submitting an application. The following process should be followed when submitting a request for a waiver:
 - Applicant must submit a written request and submit it to the CDBG Regional Project Manager (RPM). The request should include the source of funds, status of funding request and circumstances surrounding the inability to obtain a commitment from the funder.
 - Upon receipt of the request, the CDBG (RPM) will work with the Regional Development Officer (RDO), CDBG Program and Policy Coordinator (PPC) and

Finance Officer to review the request. Within 10-days of receipt of the request, Business Oregon will determine if a waiver will be granted. If granted, written waiver documentation will be provided to the applicant.

- The applicant must include the written waiver documentation with the application.
- 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.

(Note: The expected date of funding determination is not considered a “commitment” as there is no guarantee that a project will be funded.)

Project Readiness to Proceed:

- Business Oregon expects all awarded projects will start drawing funds in accordance to the Business Oregon approved Project Management Plan.
- If the project overlaps municipal boundaries, attach a draft of an intergovernmental cooperation agreement that lays out the duties and obligations of each entity.
- If the project benefits a region such as a housing rehabilitation, microenterprise or regionalized food-bank facility projects, attach an executed participation agreement between the jurisdictions that are benefitting from the project.
- If the applicant will own the facility and another nonprofit or other entity will operate the facility, attach a draft of the operating agreement between the parties.
- If applicable, all land use approvals needed for the project have been secured; documentation must be included with the application.

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 within 120 days of receipt of contract from Business Oregon.
- None of the grant activities have commenced within 4 months after execution of the grant contract and no funds have been drawn down on the project.
- 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 Business Oregon disputing the appropriateness of the proposed sanction determination by the state. After the 30-day period is concluded and assuming Business Oregon is not persuaded to rescind the potential sanction, Business Oregon 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 Business Oregon.

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 Business Oregon, 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 director of Business Oregon 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 department's Regional Project Manager. Waivers must be prepared by the CDBG Program and Policy Coordinator and approved by Business Oregon management prior to the action needing the waiver is completed.

Waivers initiated by Business Oregon 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 Business Oregon management prior to the action needing the waiver is completed.

Work Performed by Staff of the City or County (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 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

The total income earned before taxes by all household 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 household members.

Low and Moderate Income (LMI)

“Low income” means income equal to or less than 51 percent of the area median (adjusted by household size). “Moderate income” means income equal to or less than 80 percent of the area median (adjusted by household 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 Activity Delivery 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 \$35,000. Housing Rehabilitation Projects: 10% of the grant award but not more than \$25,000. Micro-Enterprise Projects: 10% of the grant but no more than \$10,000
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 \$20,000 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 \$20,000 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 Chapter 5 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, plus \$20,000 for the combined costs associated with 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 Business Oregon 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.

a. 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 that 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 at a minimum, the information shall include the following:

1. The amount of funds available for proposed community development and housing activities;
2. The range of activities that may be undertaken; and
3. 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.

b. Public Transparency

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).

c. Required Information

The local government must furnish citizens information, including, but not limited to:

1. The amount of CDBG funds expected to be made available for the current fiscal year (including the grant and anticipated program income);
2. The range of activities that may be undertaken with the grant funds;
3. 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
4. The proposed activities likely to result in displacement and the local government's anti-displacement 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.**

Note: Applications must provide documentation that items a-c referenced above, were included in the public hearing notice and articulated to the citizens attending the public hearing. Failure to include this information will result in the application not moving forward in the scoring process.

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. Final approved meeting minutes may be submitted in an audio recording format. If submitting final approved meeting minutes in this manner, the applicant must provide documentation certifying the meeting minutes were approved and the location or counter information on the audio recording of the CDBG portion of the public hearing. This will allow staff to efficiently review the minutes. The audio recording format should be in a format that can be easily retrieved and does not require any unusual or additional technological equipment. Otherwise the final approved meeting minutes must be submitted in writing.

d. 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.

e. 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 final draft of the application must be made available to the public once it is submitted, if not before.

The final approved meeting minutes along with the public hearing notice documentation must be submitted with the pre-application (PA). An invitation to apply will not be extended until it is determined that the citizen participation requirements were properly met.

The notice form included in this chapter must be used for the first hearing. 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. Meeting minutes may be submitted in audio recording format. If submitting final approved meeting minutes in this manner, the applicant must provide documentation certifying the meeting minutes were approved and the location or counter information on the audio recording of the CDBG portion of the public hearing. The audio recording format should be in a format that can be easily retrieved and does not require any unusual or additional technological equipment. 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.. 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.

Note: Meeting minutes may be submitted in audio recording format. If submitting final approved meeting minutes in this manner, the applicant must provide documentation certifying the meeting minutes were approved and the location or counter information on the audio recording of the CDBG portion of the public hearing. The audio recording format should be in a format that can be easily retrieved and does not require any unusual or additional technological equipment. 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 website. 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.

a. 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.

b. 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.

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 2021 Community Development Block Grant from the Business Oregon. 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 \$12 million will be awarded to Oregon non-metropolitan cities and counties in 2021. The maximum grant that a city or county can receive is **(maximum grant allowed for the project type)**.

The **(city/county)** is preparing an application for a 2021 Community Development Block Grant from the Business Oregon 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 that 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 2021 del Community Development Block Grant que a su vez viene del Business Oregon.

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 \$12 millones serán otorgados en 2021 a ciudades y condados no-metropolitanos de Oregon. El máximo de subsidios que la ciudad o el condado puede recibir es **(maximum grant allowed for the project type)**.

La **(ciudad/condado)** está preparando una aplicación en 2021 para el subsidio del Community Development Block Grant que viene del Business Oregon para **(nombre del proyecto, ubicación y propósito)**. Está estimado que el proyecto 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 proyecto Community Development Block Grant; and El proyecto 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 Community Development Block Grants, el proyecto 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 anticipado. 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 proyecto propuesto. Si la desalojamiento llegara a ser necesaria, serán examinadas alternativas para minimizar la desalojamiento y proveer beneficios requeridos/razonables para aquellos removidos. Cualquier casa de ingreso moderado y bajo la cual sea demolida o convertida en otro uso será reemplazada.

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Chapter 7 – CDBG Application Procedures

These procedures apply to CDBG applications submitted to Business Oregon. These procedures do not apply to the following types of CDBG projects:

1. Community Capacity/Technical Assistance Projects (see Chapter 13); and
2. Emergency Grant Projects (see Chapter 14).

Deadline(s): Applications will be accepted as outlined below.

For 2021, the application round will open on:

- o February 1, 2021 and applications will be accepted up to close of business on April 30, 2021.
- o July 1, 2021 and applications will be accepted up to close of business on September 30, 2021.

Applications will be rated and ranked and awards announced within 60 days after the application deadline. If sufficient funds remain from an application round, another application round *may* be opened. If an additional competitive application round will be held, notice will be provided to all known eligible applicants via website postings, e-newsletters, and listserv distributions.

In general, the application and award process for CDBG funding consideration shall follow the established application policies and practices established by Business Oregon, for its funding programs, as modified for the CDBG program.

Summary of CDBG Application Process

Step #	Step–Title	Timeline	Lead
Step 1	Initial Business Oregon Contact/Pre-Project Development	No defined timeline	Project Proponent and RDO/CDBG RPM are the lead, Project Development Team meeting lead by RDO/RPM.
Step 2	Project Notification and Intake Form	No defined timeline	RDO/CDBG RPM and project proponent
Step 3	Invitation to Apply for CDBG Funding	No defined timeline	RDO/CDBG RPM–Sends invitation to apply and application forms to project proponent
Step 4	Application Preparation and Technical Assistance	Electronic submission due by close of business on application deadline.	Applicant seeks guidance and technical assistance from RDO and CDBG RPM as needed. Guidance, questions, draft application review can be requested by the applicant prior to application submission.
Step 5	Application Submission and Ranking	30-45 days	Application Ranking Team (ART), consulting as needed with PSM and assistant director
Step 6	Funding Recommendations Developed and Approved		Application Ranking Team, assistant director, PSM, AOC, and LOC

STEP 7	Notice of Decision	Awards announced within 60 days after application is received.	RDO/CDBG RPM
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Step 1 – Initial Business Oregon 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 Development Officer (RDO) serving their region to review the proposed project concept and to obtain pre-project development assistance. Contact information for the RDO's can be found on the [department's website](#).

The RDO, the Community Development Block Grant Regional Project Manager (CDBG RPM) and the CDBG Program and Policy Coordinator (CDBG PPC) will work with the proponent to provide pre-project development information, including the following:

- The proposed project will meet a federal national objective;
- The applicant is not ineligible to apply under the program, refer to Chapter 2 for more information;
- The proposed sub-grantee for housing rehabilitation and microenterprise assistance grants are a certified non-profit meeting the requirements found in the respective chapters of this Method of Distribution;
- Matching funds, if any, are 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, Pre-application (PA). The Project Development Team will be comprised of, at a minimum, the RDO, the CDBG RPM, 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–Online Pre-application (PA)

Once the project has been reviewed by the PDT and appears ready to proceed and complies with the CDBG program eligibility requirements, the RDO/RPM and potential applicant will prepare an online PA.

Citizen Participation Requirements:

(Please refer to chapter 6 for specific information)

The 1st public hearing final approved meeting minutes along with the public hearing notice documentation must be submitted with the Project notification form (Intake). An invitation to apply will not be extended until it is determined that the citizen participation requirements were properly met.

Note: Contact the CDBG RPM for assistance. Refer to the current Grant Management Handbook for more detailed information.

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 has been completed and if required, receives a Release of Funds from Business Oregon.

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. 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 URA requirements is the date the potential applicant commences with STEP 2 of the required application process identified within the 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 the 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 RDO/RPM will route the PA 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 RDO/RPM to submit a complete application for CDBG funding consideration. All applicants must have been invited to apply for CDBG funding at **least 4 weeks prior** to the application deadline.

If the PA is not approved, the project proponent may be asked to improve the project information, or be considered for other Business Oregon programs or referred to other agencies' programs for potential funding consideration.

The 1st public hearing final approved meeting minutes along with the public hearing notice documentation must be submitted with the pre-application (PA). An invitation to apply will not be extended until it is determined that the citizen participation requirements were properly met. Please carefully refer to chapter 6 on the required steps for the public hearings.

Step 4–Application Preparation and Technical Assistance (ART)

At the request of the applicant, the RDO and the RPM will provide technical assistance on the proposed project and clarification on questions related to the application along with application completeness review prior to

application submission. Technical assistance on application completeness review will be provided up to four weeks before the application deadline, please allow up to 10 business days to complete the review.

The internal team 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
- Readiness to proceed data was provided;
- Financial viability of the project, and
- All activities are eligible under the CDBG program.

NOTE: Applications will be submitted electronically. Therefore, once an application is submitted, no additional changes, amendments will be possible. Applicants are strongly encouraged to work with the RDO and RPM, or with finance team if needed, to ensure the project is well developed and the application adequately reflects the required information along with all supporting documentation.

If, at any point during the application development process, it is determined the project does not meet the requirements or that it needs further development, a recommendation will be made to the applicant to continue to develop the project but consider submitting the application in a future funding round.

During the review process, the state will determine that the applicant is an eligible recipient in accordance with 2 CFR 200, 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.

Step 5–Application Submission and Ranking

The application must be submitted electronically through Business Oregon E-application portal on the application deadline date mentioned above. Applications transmitted by any other means will not be accepted.

Submitted applications will go through a preliminary review process. Applications deemed complete will be provided to the Application Ranking Team (ART). The Application Ranking Team (ART) will rank (score) all complete applications in accordance with the criteria contained in the 2021 Method of Distribution. The ART will include at least one CDBG PPC, and at least two 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.

NOTE: Once submitted, applications cannot be changed, amended, added to or revised. Please ensure all required documentation and information is included with the application upon electronic submission. This includes all attachments. If attachments are not included the application will not be accepted.

Step 6–Final Review and Recommendations

Funding recommendations prepared by the Application Ranking Team (ART) will be forwarded to the program services manager and assistant director for review. Once the recommendations are finalized, the ART will forward the recommendations to representatives of the League of Oregon Cities (LOC), Association of Oregon Counties (AOC) and Senior Management for concurrence.

- A summary of the approved funding awards will be presented to the Infrastructure Finance Authority (IFA) Board to provide them with updated funding information. The IFA Board has delegated their decision-making authority to the Assistant 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 that it deems not eligible, properly developed, ready to proceed or supported by the available program resources.
- Business Oregon 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 CDBG RPM or RDO.

Summary of Maximum Rating and Ranking Points

Scoring Category	PW-Design	PW-Const.	CF	Micro-E	HR
Project Need – Solution	45	45	40	75	80
Project Feasibility	30	30	30	15	25
Financial Match	20	20	20	20	N/A
Financial Review	30	30	33	N/A	20
Project Readiness	62	80	80	45	45
LMI population to be served (non-housing rehab)	25	25	25	25	N/A
Number of units to be rehabilitated (Housing Rehab Only)	N/A	N/A	N/A	N/A	25
CDBG Administration Capacity	20	20	20	20	20
Subgrantee Current Open Grants (Housing Rehabilitation & Micro Enterprise Only)	N/A	N/A	N/A	10	10
Applicant Recent CDBG awards	10	10	10	10	10
Bonus – HR Manufactured Park Incentives	N/A	N/A	N/A	N/A	10
Bonus – Energy Efficiency Practices (CF & HR)	5	5	5	N/A	5
Bonus – Seismic Resiliencies Practices (CF & HR)	5	5	5	N/A	5
Total Points Possible	242*	260*	258*	200	235*
80% Point Threshold	194	208	206	160	188

Note: Priority for funding will be given to applications reaching 80% of the minimum total points possible. Based on funding availability Business Oregon reserves the right to award application below the 80% to no less than 50% minimum point requirement. Such award may be in the form of a conditional award. For those below 50% of the points possible Business Oregon reserve the right to return the application for further development to submit in the next funding cycle and provide technical assistance, if requested.

*Total possible points for PW, CF, and HR do not reflect the possible bonus points.

Ranking/ Scoring Criteria

Scores will be used to rank applications for funding. **Carefully read scoring criteria and provide full and complete answers.** 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.

Maximum 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) the severity of the identified impact of the problem and the efficacy of the proposed solution. A strong application will show how 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. To view maximum points possible, please refer to the respective detailed tables on the pages to follow. **Applicants should clearly and fully address the items requested within the application.**

Project Need and Solution Part 1 – Project Type

Public Works Need and Solution Points (Design or Construction)

NEED <i>(select one that applied)</i>	Score
Is the project necessary to bring Water/ Sewer System into / remain into compliance with the Safe Drinking Water Act (SDWA) or Clean Water Act (CWA) - with existing compliance	25
Projects necessary for the provision of safe, healthy, reliable drinking water and proper sanitary wastewater service to the entire community	15

Delivery of Solution <i>(select all that applied)</i>	Score
Is the project part highest priority activities identified in the system's latest planning document approved by regulatory agency or feasibility study for those systems that are not required to have a regulatory agency approved planning document	10
Is the project is necessary to mitigate and risk of contamination into drinking water or to reduce/control Inflow & Infiltration for sewer system	10
Bonus Points: Is energy efficiency incorporated into the project design (business case is provided), which might include water conservation implementation.	5
Bonus Points: Is disaster mitigation (seismic resiliencies) component incorporated into the project design?	5

Public Facilities Core Points

Project Category	Project Type	Maximum Points Possible
Projects that reduce homelessness and hunger or pertain to life threatening situations	Homeless Shelters, Food Banks, Shelters for victims of domestic violence. Senior Centers will be included in this category if the primary purpose of the facility (verified through documentation) is to provide meals through its Meals on Wheels type program.	40
Essential community needs	Shelters/workshops for people with disabilities, Health Clinics, Mental Health treatment centers, Drug and Alcohol treatment facilities, , Head Start facilities	30

Other community services	Libraries, Fire Stations, Senior Centers	20
Other community projects	Community Centers ¹ , Multi-Service Centers	10
Bonus Points	Is energy efficiency incorporated into the project design (business case is provided)	5
Bonus Points	Is disaster mitigation (seismic resiliencies) component incorporated into the project design?	5
Note:	<p>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.</p> <p>For a public facility that proposes to combine eligible use activates, e.g., Senior Center/Food Bank, up to 10 additional points may be granted, based on the ratio of use of the facility, for a maximum of 50 points.</p>	

Microenterprise Assistance Public Services Need and Solutions Points

Project Need	Maximum Points Possible
3 or more communities participating in microenterprise assistance project	45
2 communities participating in microenterprise assistance project	25
1 community participating in microenterprise assistance project	15

Delivery of Solution	Maximum Points Possible
Sub-grantee, based on the identified training need, create and conduct the training	5
Sub-grantee, based on the identified training need, provide training by utilizing existing training (through local training providers such as Community colleges, SBDC)	5

Collaboration	Maximum Points Possible
The applicant has at least 2 formalized relationship with State (such as ROI program), non-profit or Partner foundation/organization in local MicroEnterprise/ Small Business Ecosystem development.	15
The project is based on a local/ regional economic development plan	10

¹ Definition of Community Center and Family Resource Center can be found in Chapter 11
2021 Proposed Method of Distribution
February 5, 2021

Housing Rehabilitation Need and Solution Points

Project Category	Project Type	Maximum Points Possible
Housing Rehabilitation – Priority #1	Eligible health and safety activities including lead-based paint abatement/removal, septic tanks, private sewer lines and drainfields, private water lines and wells and asbestos tests, inspections and assessments. Improvements necessary to fulfill reasonable accommodation requests.	56-80
Housing Rehabilitation – Priority #2	Construction, rehabilitation, reconstruction, or the installation of improvements to upgrade substandard electrical, plumbing, roofing, siding, insulation, weatherization, heating systems; water heaters, and dry rot repairs	31-55
Housing Rehabilitation – Priority #3	Purchase and installation of equipment that is an integral structural fixture. (Items not normally removed from the home, such as installed light fixtures, and built-in appliances).	0-30
Housing Rehabilitation – Bonus Points	Policies and procedures must clearly state all housing rehab projects will use energy efficiency best practices and define those practices.	10
NOTE:	Applications with a combination of priority projects reflected on the wait list will be scored on a percentage basis. For example: Based on a 25-person wait list, 10 projects fall under Priority #1 representing 40% of the total list and the remaining fall under Priority #2, representing 60%. Therefore 40% of the maximum 80 points allowable under Priority #1 would equal 32; 60% of 55 points possible would be 33 for a combined total of 65.	

Project Feasibility

Project Feasibility	Public Works	Community Facilities	Micro-Enterprise
<p>Best Solution: Application must list the alternatives presented to the governing body and discussion of the factors that support the proposed project.</p> <p>For Microenterprise: Has this solution been a part of a local/ regional economic development effort identified through a planning process such as from the Rural Initiatives Opportunity Program.</p>	5	5	5
<p>Adequate Budget: The Applicant must provide a detailed project budget that includes contingencies and breakout of project costs in accordance with the Program Policies and Definitions in Chapter 5 of the Method of Distribution.</p>	5	5	5
<p>Community Support: Describe, in detail, the level of community support or buy-in, investment of money, time and resources or various studies the applicant has put into the development of the project. Provide supporting documentation.</p> <p>For MicroEnterprise: Describe other investments and into making this effort ready for implementation.</p>	5	5	5
<p>Cost Effective Solution: Provide evidence the applicant has analyzed the project cost (or completed value engineering) to ensure the proposed project is a cost effective solution.</p>	5	5	NA
<p>Operational Feasibility:</p> <p><u>PW Projects:</u> Provide justification and documentation on how the applicant will sustain operations and adequately budget for future Operations, Maintenance and Replacement (OM&R) costs upon completion of the project.</p> <p><i>Note: Analysis will, at a minimum, consist of cost of project construction estimate, expected cost of maintenance and costs expected for annual operations (breakdown of specific estimates; utilities, chemicals, hours of personnel, etc.)</i></p> <p><u>CF Projects:</u> Provide justification and documentation on how the applicant or nonprofit, if applicable, will sustain operations and adequately budget for maintenance costs/ replacement reserve upon completion of the project for, at a minimum, the 5-year continued use period.</p> <p><i>Note: Analysis will, at a minimum, consist of project construction activities, expected cost of maintenance and costs expected for annual operations (breakdown of specific estimates; utilities, hours of personnel, etc.)</i></p>	5	5	NA

<p>Revenue Source Ongoing: <u>PW Projects:</u> Revenue source for repayment of loan (if applicable) and future OM&R has been reviewed and updated (rate schedule is updated and ready for adoption or revised rate schedule has been adopted). Provide supporting documentation.</p> <p><u>CF Projects:</u> Revenue source for loan repayment (if applicable), operations, and maintenance have been reviewed and updated. Provide supporting documentation.</p>	5	5	NA
<p>Total Possible Score</p>	30	30	15

Project Feasibility	Housing Rehabilitation
Best Solution: Application must list the alternatives presented to the governing body and discussion of the alternatives that support the proposed project, this could include other funding alternatives.	5
Adequate Budget: The Applicant must provide a detailed project budget that includes contingencies and breakout of project cost in accordance with the Program Policies and Definitions in Chapter 5 of the Method of Distribution, ensuring totals don't exceed the project/grant management allowable costs.	5
Community Support: Describe, in detail, the level of community support or buy-in, investment of money, time and resources or various studies the applicant has put into the development of the project. Provide supporting documentation.	5
Bonus: Manufactured Park Incentive: Additional \$100,000 in home repair assistance to homeowners in manufactured parks: Provide evidence the applicant has determined the need for the additional funds, no additional funding is available to fill the gap and how the funds will be tracked separately within the project. Documentation should include implementation process and deliverables/milestones.	10
Total Possible Score	15

Financial Match – 20 points

Applicants will receive points based upon the percentage of the committed/secured match funds in the project, compared to the CDBG grant requested. (***Does not apply to housing rehabilitation projects***).

For example:

Total Project Cost:	\$1,200,000
Less Requested CDBG Grant:	\$800,000
Committed Matching Funds:	\$400,000

$$\$400,000/\$800,000 \times 100 = 50\%$$

This project would be assigned 15 points.

Percent Match Funds in the Project	Maximum Possible Points
51 – 100%	20 points
26–50%	15 points
1–25%	10 points
0%	0 points

Financial Review – 30 Points

To document financial review, refer to the applicable chapter of this MOD for details: Chapter 9 Microenterprise; Chapter 10 Public Works; and Chapter 11 Community Facilities. The ART and the public finance officer complete this review. Below is some general guidance on the documents needed, and review requirements:

- Direct and clear evidence the grant funds are needed and that the project can be carried out. If the department cannot determine the grant funds are needed, **the application will not be recommended for funding.**

- 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 applicable.
- 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 or 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 grant request and 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 to meet the identified need.
- 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.

Financial Review Matrix – PW

Financial Assessment

Assessment	Maximum points to earn
Applicant MHI vs State MHI	6
Current rate against affordability rate	6
Project cost burden to user rate if funded by loan only	6
Total	18

Financial Health Assessment

Assessment	Maximum point to earn
Operate at (Loss, Even or Positive) cash flow and reserve	4
Unrestricted Reserve review	2
User Rate management	3
Total	9

Return on Investment Analysis

Assessment	Maximum point to earn
CDBG investment per connection	3

Total Financial Review for Public Works	33
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Financial Review Matrix – CF

Financial Assessment

Assessment	Maximum point to earn
Applicant MHI vs State MHI	7
Operating revenue assessment	7
Total	14

Financial Health Assessment

Assessment	Maximum point to earn
Number of year in operation	7
Condition of Operation Cash Flow	5
Reserves	4
Total	16

Return on Investment Analysis

Assessment	Maximum point to earn
CDBG investment per Beneficiary	3
Total Financial Review for Community Facilities	33

Financial Review Matrix– HR

Assessment	Maximum points to earn
Financial Capacity:	
Does the applicant or the sub-grantee have financial underwriting capacity? Do they have a project manager/inspector on staff or on contract?	5
Revolving Loan Fund:	
Does the applicant or the sub-grantee have a RLF? What's the amount available for this project? Have all the funds been dedicated to current households on a waitlist?	5
Return on Investment:	
Has this applicant or the sub-grantee managed housing rehab in the past, if yes, what is the total number of homes vs amount expended within the last year. Is the value of investment evidenced?	5
Reinvestment:	
Are the funds used for reinvestment into the community or recapitalization of program costs?	5
Total Financial Review for Housing Rehabilitation	20

Project Readiness to Proceed—Core points by project type

Application must clearly show the following information:	PW-Design	PW-Const.	CF	Micro	HR
<p>Provide workplan with achievable quarterly milestones which will be incorporated contractually into monitoring requirements and shows funds will start to be drawn within 4 months after award and project will be completed within allotted project completion time. Workplan must include, but is not limited to, target timeline that would address CDBG programmatic requirements as identified within the most recent CDBG Grant Management Handbook Chapter 2 (Checklist); government/regulatory agency decision making and review time; and specific project implementation time. (Final design/construction public water/sewer or public/community facility grants must be administratively closed within 24 months of grant execution. Design only projects and Housing Rehabilitation projects must be administratively closed within 24 months of grant execution. Microenterprise assistance projects must be administratively closed within 12 months of grant execution.)</p> <ul style="list-style-type: none"> ▪ Note: <ul style="list-style-type: none"> ○ <i>Failure to provide sufficient detail will negatively impact the application score. Timeline should be realistic.</i> ○ <i>If selected, an applicant's failure to complete and meet targeted milestones identified in the timeline will hold consequences up to and including withdrawal of funding.</i> 	20	20	20	20	20
Proposed project site is free and clear of any restrictions that impede the ability to start the project in a timely fashion (i.e. Liens, deed restrictions, homestead limitations or conditions for which a waiver(s) need to be obtained)	N/A	5	5	N/A	N/A
Proper land use entitlements and other attainable permits (obtainable before construction) have been obtained for the project type and will run for the duration of the proposed project (land use approvals, zoning, removal of structures, allowable uses, etc.). Documentation listing all permits along with the status of and projected timeline to secure permits must be included with the application.	5	5	5	N/A	N/A
Total Core Points:	25	30	30	20	20

Additional Project Readiness to Proceed per Project Type

Project Readiness Criteria	Points	PW-Design Only	PW-Const. Only	CF	Micro-E	HR
Applicant or the related governing body attended either an asset management training or effective utility management training in the past 12 months	2 points	✓	✓	N/A	N/A	N/A

Complete Business Oregon reviewed Section 3 Plan	2 points	✓	✓	✓	✓	✓
Complete Business Oregon reviewed Limited English Proficiency Plan	2 points	✓	✓	✓	✓	✓
Adopted a Fair Housing Resolution	2 points	✓	✓	✓	✓	✓
Completed/Updated Section 504 Checklist	2 points	✓	✓	✓	✓	✓
Environmental Review Record level is correctly identified	2 points	✓		✓	✓	✓
Regulatory agency approved planning document/feasibility study (PW)	15 points	✓	N/A	N/A	N/A	N/A
Architectural design(CF) or System improvement design work done and approved by regulatory agency (PW)	15 points	N/A	✓	✓	N/A	N/A
ERR is completed per CDBG requirements (ready to publish)	15 points	N/A	✓	✓	✓	✓
Property/easements acquired (site control)	10 points	✓	✓	✓	N/A	N/A
Total		37	50	50	25	25

To receive credit for any or all points, clear documentation must be included in the application.

Percent of Low- and Moderate- Income (LMI) population to be served – 25 points

Non-Housing Rehab Projects	
% LMI of Target Population	Max Points
90%–100%	25
80%–89%	20
70%–79%	15
60%–69%	10
51%–59%	5

Low- to Moderate-Income Persons to be served by the Facility/Project

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.

Existing Limited Clientele Facilities

Projects that 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 household 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 household 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).

Housing Rehabilitation – Number of units to be rehabilitated – 25 Points

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

CDBG Administration Capacity – 20 points

Capacity	Maximum points
Applicant’s staff has CDBG program administration experience in the past five to seven (5-7) years.	5 points
Applicant’s staff has other federally funded project administration experience in the past five to seven (5-7) years.	5 points
Applicant procured an experienced Grant Administrator with a successful CDBG track record, OR	10 points
Applicant is intending to procure an experienced Grant Administrator with a successful CDBG track record	5 points

A maximum of 20 points for capacity is available to applicants with a grant administration plan and history that demonstrates that the grant award and project will be managed effectively. The application should document and/or clearly show:

- 1) Applicant is currently administering other CDBG grant(s) within the allotted timeframes.
- 2) 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.
- 3) Experience in handling other federally funded project and the depth of administration responsibilities
- 4) Applicant has experienced staff in grant administration or will secure a grant administrator with successful grant administration experience of CDBG projects.

Sub-Grantee (non-profit) Capacity–10 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 Number of open grants	Maximum Points
2	4
1	6
0	10

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 2017 or earlier. For housing rehabilitation projects, the points will be based on applicant or geographic location.

Recent CDBG Awards	Maximum Points
No awards from Business Oregon in the past 4 or more years	10 points
No awards from Business Oregon in the past 3-4 years	7 points
No awards from Business Oregon in the past 2-3 years	4 points

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	Semi-annual	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	Semi-annual	LMI-Area Wide
	Water/Wastewater final design-Phase 2		24 months	Yes	Semi-annual	LMI-Area Wide
	Water/Wastewater construction-Phase 3		24 months	Yes	Semi-annual	LMI-Area Wide
	Water/Wastewater (Design only/construction only award)		36 months	Yes	Semi-annual	LMI-Area Wide
Public/Community Facilities	Combined design & construction award	\$1,500,000	36 months	Yes	Semi-annual	LMI-Area wide LMI-Limited Clientele
Housing Rehabilitation	Regional Rehabilitation Revolving Loan Funds	\$400,000	24 months (original grant must be loaned/granted within 24 months or unused funds will be recaptured by the state.)	Yes	Semi-annual	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 – Economic Development

Oregon Community Development Block Grant funds are used by non-entitlement cities and counties to provide economic development helping those communities to have vibrant downtowns and increase the economic impact of micro-enterprise businesses.

This chapter will provide guidance for two economic development eligible project types;

- Microenterprise assistance
- Downtown revitalization (this activity will not be eligible for funding until the 2022 FY)

Microenterprise Assistance

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. It is also enhancing the collaboration of an existing local/regional program in promoting Economic Development through the Micro-Enterprise ecosystem development.

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 sub-granting the funds to a nonprofit or by procuring a for-profit entity.

Maximum Grant

The maximum grant in this category is \$100,000, with grant administration allowance of 10%

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 household 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 for owners of microenterprises and persons developing microenterprises. This training can be done by creating a class that will assist 51% or more LMI Microenterprise or by enrolling the LMI microenterprise to existing training in the locally offered classes (such as community colleges, SBDC, etc.). The latter option must benefit 100% LMI microenterprise.
- Direct Technical Assistance to LMI Microenterprise which many of which are startup enterprises requiring intensive assistances such as (but not limited to) business planning, basic accounting, and market research assistance.

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 feasibility 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.
 - Enrolling the LMI microenterprise to existing training in the locally offered classes (such as community colleges, SBDC, etc.) (this option will benefit 100% LMI microenterprise.)
 - Providing technical Assistance or other support services to increase the capacity to carryout microenterprise activities.
- Limited English Proficiency Translation Services—Refer to Chapter 5 for details.

Classroom Training:

- **Business Strategy Training**—Core trainings and assistance focused on developing and refining business feasibility 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.

Technical Assistance:

Technical assistance can be provided in preparation of a capital investment on any identified issues after proper assessment such as budgeting, marketing, or business planning has been completed. This assistance can be in conjunction with a microloan in order to help alleviate risk and increase the chance for success.

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 2021 CDBG Method of Distribution lists the entitlement areas in Chapter 2.

Matching Funds Requirement

There is no minimum match requirement.

If matching funds are included in the project budget and necessary to complete the project it must be in the form of cash only. 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. 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 the 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: <ul style="list-style-type: none"> • 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 who benefit.
			Number of communities assisted.	Number of persons benefiting from new microenterprise services including the percentage of low- and moderate-income persons who 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:
 - Meeting the definition of a microenterprise contained on page 9-1;

- Residing within the defined service area;
 - Are not residing within an entitlement area; and
 - Are not relocating or have not relocated their microenterprise.
- A draft of the household size and income forms that include the data collection necessary to meet the requirements of a-d listed above.

Chapter 10 – Public Works

Public Works Projects

Business Oregon 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 or 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

Grants can be made for each of the two phases (final design or 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 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.

Business Oregon Water Meter and User Rate Policy

It is our policy to require the installation of water meters within the project area as part of an infrastructure improvement project funded by the agency. Once the project is completed, the utility must routinely read the installed meters and bill those customers, in part, according to their water consumption. Business Oregon encourages the water utility to adopt an ascending rate fee structure.

Business Oregon encourages water utilities to conserve water.

Matching Funds Requirement

There is no minimum match requirement.

If matching funds are included in the project budget and necessary to complete the project it must be in the form of cash only. 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. No in-kind services or costs are allowed as match.

Financial Review

All applications for public works projects will undergo a financial review. The grant, if awarded must be the minimum necessary, in combination with other resources, to ensure 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, the application will not be processed.**
- 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 or 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

Business Oregon 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 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 five year period begins after a project has completed all requirements for project close out.

For example: Greentree applied for a \$500,000 (amount used as an example, only) design grant for their Phase I water system improvements design on March 31, 2016. Greentree is not eligible for an additional \$2,500,000 grant because they have already received \$500,000 in prior grants for their water system improvements design (Phase I) over the last five years. They would not be eligible for another \$2,500,000 for their water system improvements until 2021. However, after March 31, 2016, they could apply for \$2,000,000 from the program for the construction of the water system improvements. This would assume they have a project meeting the eligibility requirements for construction phase of the project.

Example Schedule of Events

2020	2021	2022	2023	2024	2025	2026
Phase I Design		Phase II Construction				
Design		Construction		Final Design or Construction		
Awarded 3-31-2020 \$500,000		Awarded 8-8-2021 \$2,000,000		Application received 3-31-2020 \$2,500,000 NOT ELIGIBLE But would be eligible for \$500,000		Eligible for another \$2,000,000 (in 2022)

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 that was assisted in whole or in part with CDBG funds is providing an area wide LMI national objective benefit everyone served by that system must be physically connected to the water or wastewater system 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 PA 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.

Equivalent Dwelling Unit (EDU)

USE	Current		Future (20-year projected capacity)	
	EDU's	Flow	EDU's	Flow
Residential Permanent				
Commercial & Business				
Industrial				
Other				
Total				
Percent Residential	%	%	%	%

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 or No

Capacity Building – Total Current (Flow x 2):

Is it more than the Total Future Flow? Yes or No

Percent Residential – (Residential / Total) x 100%:

Is the residential component more than 51% Yes or No

	Population at date of income qualification (2000 census or other approved survey)	Current Population Estimate	Future Population Estimate
Total Persons			

Funding Criteria

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 **not** 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 design and planning activities that are directly necessary for the construction project or 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.
- Design and planning activities that are directly necessary for the construction project or construction projects necessary for the provision of dependable and efficient water storage, treatment and/or transmission to meet domestic drinking water needs;
- Design and planning activities that are directly necessary for the construction project or 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 and final engineering, surveying, architectural and other support planning 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 or 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

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.

- **Planning and 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.*

For Funded Projects - 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.

	Planning and Final Design	Construction
Grant Maximum	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	<ul style="list-style-type: none"> • Preliminary Engineering • Final engineering designs, bid specifications, and updated cost estimates • Project financial feasibility information • water management and conservation plans (as required by the Oregon Water Resources Department through permitting processes) • 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 	<ul style="list-style-type: none"> • 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

Planning and Final Engineering Grants

Grant funds are available to help the applicant obtain the products listed below that 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. 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;
- Water management and conservation plans (as required by the Oregon Water Resources Department through permitting processes)
- Preliminary Engineering
- Pre-design reports, final engineering design and bid specifications. Refer to Chapter 5 for more information on the limits of engineering costs;
- Completion of ready to advertise bid document;
- 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;
- Construction 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;
- Other planning activities necessary and directly related to the construction of comprehensive system-wide improvements addressing a 20-year time frame; 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: Applicants who already have completed the work involved in what these rules term a planning project may apply directly for a final engineering grant. The department may determine upon review of the application that an award for 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 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. 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:

- 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;
- 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 final engineering grant from the Community Development Block Grant program. Applicants who have completed the work involved, described by the rules planning, final engineering projects and Environmental review (in accordance to CDBG requirements), may apply for a construction grant. Following review of the application, the department may determine an award for 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:

Objective	Outcome (Pick One)	Indicators	Performance Measures	State Measurement
Suitable Living Environment	<ul style="list-style-type: none"> • Availability/ Accessibility • Sustainability/ Promoting Livable or Viable Communities 	Number of households assisted with: <ul style="list-style-type: none"> • 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)	

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Chapter 11 – Public Facilities

Oregon Community Development Block Grant (CDBG) funds can be used for the acquisition, rehabilitation and construction of facilities that benefit communities and low to moderate income individuals and families.

Maximum Grant Amount

The maximum grant amount for a single public facility project is \$1,500,000. The \$1,500,000 per project limitation covers both final design and construction necessary to complete public 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:

- a. 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).
- b. The combination facility must **only** house eligible public facility projects, as listed in this chapter, and eligible activities identified within this 2021 Method of Distribution.

A combination facility will not be considered two separate projects and the applicant will only be eligible for the maximum single public 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 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 <u>exclusively serve persons 60 years of age and older.</u>	Low and Moderate Income–Limited Clientele Or Low and Moderate Income–Nature and Location
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 and constructed on land owned by the applicant. 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 provide needed community services and must be open to the entire population of a defined service area. The facility must be owned by the Applicant at the time of rehabilitation or construction.	Low and Moderate Income–Area Wide Benefit or Low and Moderate Income–Limited Clientele
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—0-4 years of age (per Federal Head Start Program Definition)

Child—Persons 0-12 years of age.

Youth—Persons from 12-21 years of age.

Adult—Persons 21 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. [Do the specialty calculations and detailed requirements for relocation activities, any applicant with a proposed project that involves relocation will be required by Business Oregon to hire a Business Oregon approved specialist 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.

Ineligible Activities

- Deferred maintenance on properties that had received funding from CDBG within the last 15 years from the date of application.

Entitlement Area Review

State Community Development Block Grant resources cannot be used to benefit entitlement counties and cities. If the service area of the Community Facility 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 2021 CDBG Method of Distribution lists the entitlement areas in Chapter 2.

Matching Funds Requirement

There is no minimum match requirement.

If matching funds are included in the project budget and necessary to complete the project it must be in the form of cash only. 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. No in-kind services or costs are allowed as match.

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.

The applicant must provide the

If an applicant 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 will not be the owner after the project is completed the eligible nonprofit or other entity’s financial records will be analyzed for the ability to service debt and ability to operate for a minimum of five years after project completion.

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.

All applications submitted for public facility funding must include a budget with a ten-year projection of replacement reserve (maintenance) account deposits.

If, during staff review of the application, direct and clear evidence is obtained by the department that the grant funds are not needed and the project can or will be carried out by the applicant whether or not the grant is awarded, the application will not be processed.

All financial information in the application must be prepared for the proposed activity, unless another funding source (e.g., USDA Rural Development) 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 Facilities Activities**

Eligibility, Activity Type, and Maximum Grant Awards

	Final Design and/or Construction
Grant Maximum	\$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.	

Architectural/Engineering Requirements

Preliminary engineering/planning documents, final design engineering documents and construction oversight in projects 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

Grant funds are available to help the applicant prepare the final design and to construct the proposed public/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
<ul style="list-style-type: none"> Decent Housing Suitable Living Environment 	<ul style="list-style-type: none"> Availability/Accessibility Affordability 	Number of households assisted with: <ul style="list-style-type: none"> 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: <ul style="list-style-type: none"> 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 households 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

Business Oregon 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.

Incentive to Type 1 or Type 2 – Applicant can request an additional \$100,000, increasing the maximum amount allowable for housing rehabilitation to \$500,000 with one exception—the additional funds must be dedicated to income qualified, single-family homeowners to provide repairs to owner-occupied homes in manufactured parks. Applicant must outline how the funds will be tracked separately from the initial \$400,000 award showing project implementation, disbursement schedule and deliverables. Remaining programmatic requirements will remain the same and funds for Grant Administration, Program Management, Environmental Review and other associated project costs will not increase.

Note: A sole proprietor contractor 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 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 Business Oregon 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 Business Oregon 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:

- The lead applicant;
- The participating city/county jurisdictions;
- The eligible 105(a)(15) non-profit organization that will be carrying-out the housing rehabilitation program on behalf of the lead applicant; and
- 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. If the program will be servicing manufactured homes the application can include an additional \$100,000 request.

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 Business Oregon. Any unobligated funds, in the CDBG award **will** be recaptured by the state after 24 months.

Matching Funds Requirement

There is no minimum match requirement.

If matching funds are included in the project budget and necessary to complete the project it must be in the form of cash only. 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. No in-kind services or costs are allowed as match.

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 household income as adjusted by household 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.
- **Energy efficiency** – Programs are encouraged to use energy efficiency standards or materials for each of the homes receiving a benefit. The program policies and procedures must provide detail as to how the program will use energy efficient practices. Some examples of energy efficient practices include but are not limited to;
 - Effective Insulation
 - High performing windows
 - Sealing holes and cracks in the envelope of the home
 - Sealing holes and cracks in the ducting
 - Using energy star appliances, water heaters, etc.

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-1977 manufactured 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 Business Oregon, and the requirements for future loan repayments.

Eligible Activities	Maximum Allowed in Original Grant from Business Oregon	Maximum based on \$400,000 grant request	"De-Federalized" Loan Re-payments Requirements (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	No 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 \$20,000 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.	\$75,000 Calculated as follows: $20\% \times \$400,000 = \$80,000$ $\$80,000 + \$20,000 = \$100,000$ $\$100,000 - \$25,000 = \$75,000$	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 \$20,000 per project	\$20,000	No federal requirements.
LEP Translation Services —Refer to Chapter 5 for details.	Up to \$3,000 per project	\$3,000	No federal requirements.
Legal	There is no maximum limit	There is no maximum limit	None
Audit	Refer to Chapter 5 for details	Refer to Chapter 5 for details	No federal requirements.
Activities 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. 2) Improvements necessary to fulfill reasonable accommodation requests. 3) Construction, rehabilitation, reconstruction, or the installations of improvements to upgrade substandard electrical, plumbing, roofing, siding, insulation, weatherization, heating systems, water heaters, and dry rot repairs. 4) Purchase and installation of equipment that is an integral structural fixture. (Items not normally removed from the home, light fixtures and built-in appliances.) 5) Substantial Rehabilitation which could exceed the 50% market value of a home. The scope must include code concerns. Policies must clearly define substantial rehabilitation. 6) Repairs to manufactured homes	Maximum Grant \$400,000 less the items listed above. Eligible for additional \$100,000	\$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.

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, owner's 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 that 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 RPM about the eligibility of these fees.
 - All fees need to be reviewed and approved by Business Oregon's RPM 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. **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.** 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 sub-granted 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 sub-granted non-profit.

Program Implementation

The original sub-granted non-profit must implement and manage the housing rehabilitation project.

- The sub-granted nonprofit is responsible for implementing the housing rehabilitation activities and will be the owner of all program policies and procedures.
- The sub-granted 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 sub-granted 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 sub-granted 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).

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 sub-grantee (eligible non-profit) 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:

- 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.
- 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 Business Oregon 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 sub-grantee (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 sub-grantee (eligible non-profit) 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.

1. A city/county grant recipient must sub-grant the CDBG funds to a 105(a)(15) HCDA-eligible nonprofit entity.
2. The sub-grantee (eligible non-profit) 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.
3. A **professional services agreement** between the sub-grantee (eligible non-profit) and the professional services provider for grant administration and limited program management is acceptable to Business Oregon, 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 sub-grantee (eligible non-profit),
 - Clearly define the sub-grantee (eligible non-profit) as the final authority for all decisions pertaining to the housing rehabilitation activities.
- The sub-grantee (eligible non-profit) 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 sub-grantee (eligible non-profit) 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 sub-grantee (eligible non-profit) cannot relinquish its responsibility for the oversight and management of the CDBG funds.
- Contracts/agreements must be approved by Business Oregon to determine that the sub-grantee (eligible non-profit) 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 requires that loan portfolios will not be sold or transferred and that all loans must be repaid to the original sub-grantee (eligible non-profit) under 105(a)(15) of the Housing and Community Development Act.

Defaults

Business Oregon encourages the sub-grantee (eligible non-profit) 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 household 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: <ul style="list-style-type: none"> • 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

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 grantee)” 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 of 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 expires 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 has been rectified and the appropriate documents submitted to the state for review and approval.

The following items must be submitted in order to complete the certification process:

- Certificate from the IRS regarding current nonprofit status;
- Articles of Incorporation – must include housing statement;
- By-Laws;
- Documentation that one of the organizations primary purpose is to provide decent, safe, sanitary affordable housing for LMI households;
- Documentation that the organization serves the development needs of the communities; neighborhood revitalization, community economic development, or energy conservation;
- Program policies, this should include reasonable accommodation, fair housing, LEP, record retention;
- Define service area;
- Organization must demonstrate capacity to run the Housing Rehabilitation Program;
- Documentation of all board members;
- Organization financial documents, include balance of revolving loan fund if applicable, and;
- All loan/grant documents that will be used to run the program.

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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. The 2021 1% allocation is maxed at \$136,000.

Any requested technical assistance must help the applicant to increase CDBG technical capacity.

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.

If matching funds are included in the project budget and necessary to complete the project it must be in the form of cash only. 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. No in-kind services or costs are allowed as match.

Financial Review

No financial review is conducted for these projects.

Applications Accepted

Applications are accepted year-round. Contact a regional development officer 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 Business Oregon’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 carry out the activity; and
- The project is ready to proceed.

Step 3—(Processing)

Proposal 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 assistant director for review and approval.

Step 5–(Notification)

The department shall notify project proponents, in writing, of their funding status approximately 60 days after receipt of a complete concept for funding.

The department reserves the right to not fund any proposal that it deems not eligible, properly developed, or not ready to proceed. All funding decisions made by the department's assistant director and/or if applicable, department director are final.

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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 Development Officer (RDO).

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 Non-displacement. Before initiating any real property acquisition activity, an applicant should consult with the department’s Regional Development Officer.

Available Funds

Funds available for emergency grants will not exceed 10 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 10 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.

If matching funds are included in the project budget and necessary to complete the project it must be in the form of cash only. 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. No in-kind services or costs are allowed as match.

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 18 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 carry out 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, and:
- 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 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; (B) finance the acquisition by low- and moderate-income home buyers of housing that is 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 household. 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. Complete the specialty calculations and detailed requirements for relocation activities, any applicant with a proposed project that involves relocation will be required by Business Oregon to hire a specialist acceptable to Business Oregon 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 Development Officer (RDO) for assistance and more information. Complete applications for emergency projects must be received by the department within 18 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 RDOs will be assigned to work with the project proponent to develop and review the proposed concept.

The RDO 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 RDO will then route the form for internal agency comment.

Step 2—(Invite Application)

The RDO 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)

A completed e-application must be received by Business Oregon through the Business Oregon Portal no later than 18 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 RDO 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 Business Oregon program services manager and the assistant 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.

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Chapter 15 – COVID 19 Emergency Assistance

On March 13, 2020 the President of the United States and on March 30th the governor of the great state of Oregon declared a national/state disaster due to the outbreak of coronavirus disease 2019 (COVID-19). The CDBG program administered under Oregon Business Development Department (Business Oregon) may be used for a range of eligible activities that prevent and respond to the spread of infectious diseases such as the COVID-19.

This chapter applies to all non-housing CDBG activities to address impacts of the COVID-19 crisis funded by CARES Act. Those activities consist of:

- Emergency Small Business and Micro-Enterprise Assistance
- Covid-19 Impact Assistance
- Rental Assistance

Funds for all of the activities above alongside detail application process and a more detail guidelines will be available through series of published Notice Of Funding Availability (NOFA).

Emergency Small Business & Micro-Enterprise Assistance Grant Program:

Due to the outbreak social distance made it difficult for small business to stay open. On March 23, 2020, the governor declared stay at home order, only essential business or business that could practice six feet social distancing. Many businesses especially small businesses and Micro-Enterprise are impacted and in need of assistance to remain in business and to sustain jobs.

In an effort to provide assistance to small businesses in non-entitlement area of Oregon, the state CDBG program will be providing the following assistance:

- New businesses or business expansion to create jobs and manufacture medical supplies necessary to respond to COVID-19.
- Avoid job loss caused by business closures related to social distancing by providing short-term working capital assistance to small businesses to enable retention of jobs held by low- and moderate-income persons.
- Provide technical assistance, grants and other financial assistance to establish, stabilize, and expand microenterprises that provide medical, food delivery, cleaning, and other services to support home health and quarantine. (A microenterprise is defined as a commercial enterprise that has five or fewer employees, one or more of whom owns the enterprise)
- Carry out job training in for LMI workers in the communities affected by coronavirus-related job loss since January 2020 to revitalize affected labor force and business sector
- The Emergency Business Assistance grant program is intended to;

- Help businesses remain solvent through the crisis and be ready/able to rebuild
- Fill specific cash flow gaps in businesses' larger efforts to scale down, reduce expenses, and take any additional defensive measures to survive the crisis.
- Equip businesses with revitalized labor force

Note: more detail guidance will be included within the NOFA – application guidance

Who Can Apply

The state CDBG program is only available to non-entitlement cities or counties (cities or counties that don't have a direct allocation of CDBG funds from HUD).

The non-entitlement city or county grant recipient must sub-grant the funds to either one of the following the non-profit organizations:

- For Small Business Assistance: a statewide or local Economic Development, Non-profit organization certified in providing small business lending (such as the following but not limited to: EDA, SBA, USDA, CDFI).
- For microenterprises businesses: secure services of a microenterprise support organization.
- For job training: organizations experienced in small business, MicroEnterprise/ workforce training.

As mentioned above, funds for this program will be available through a published NOFA. There will be no deadline for application but funds will be awarded to the first eligible projects and until all set-aside funds are exhausted.

National Objective:

Small Businesses and Micro-Enterprise Assistance Grant Program must meet the federal national objective of benefiting low- to moderate-income persons based on household 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 or jobs created/ retain by small businesses/ microenterprise grant assistance program

Federal Requirements

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 within Chapter 7 of this Method of Distribution. More detailed information can be found in the Grant/Project Management Handbook and other resources available from Business Oregon. The CDBG Grant Management Handbook (2017 Edition) or most current edition, can be found on the [Department's website](#). Business Oregon 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.

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.

Regional Projects

This program is to benefit two or more local governments (for example, a city and a county, or two cities). 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.

Joint Projects

This program is to benefit more than one jurisdiction combination of cities and counties in a regional or joint project. However, only one jurisdiction can be the applicant. 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 Business Oregon approved form of local government agreement for the region.

Intergovernmental Agreement (IGA)

The service area of the proposed Business Assistance Grant Program must be clearly defined and acknowledged by all the participating jurisdictions through an IGA or other Business Oregon 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 one other city/county jurisdictions to form a regional Small Business Assistance program. At a minimum, the agreement must clearly define:

- 7) The lead applicant;
- 8) The participating city/county jurisdictions;
- 9) The eligible non-profit organization that will be carrying-out the business assistance grant program on behalf of the lead applicant; and
- 10) 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.

Maximum Grant Amount

The maximum CDBG grant in this category will be defined in the NOFA

Grant Administration

Up to 10 percent of the grant award, but not more than \$15,000

Work Plan

Each application must contain a work plan that provides for a minimum performance measure of assisting at least:

- One (1) Low Moderate Income job created/retain for every \$2,500 awarded to the applicant. Or,
- One (1) microenterprise for every \$10,000 awarded to the applicant.
- For training: One (1) Low Moderate Income individual 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.

Program Structure

CDBG 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 :
 - For Small Business Assistance: a statewide or local Economic Development, Non-profit organization certified in providing small business lending (such as the following but not limited to: EDA, SBA, USDA or a CDFI).
 - For microenterprises: secure services of a microenterprise support organization.
- The (sub-grantee) eligible non-profit organization must carry out program 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 CDBG program. The nonprofit may undertake all activities or may utilize a professional services agreement to accomplish grant administration and limited program management work.
- This is a grant program only. Recipient of funds will not require repayment from any small business or microenterprise that receives the assistance.
- Eligible businesses
 - Those immediately impact by the public health restrictions
 - Were generally stable/strong prior to the crisis
 - Employ low –moderate income individuals
 - Be a microenterprise (5 or few employees, owner is low-moderate income)
 - Must have been in business for a minimum of one year

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 as a nonprofit or a certified Community Development organization.
- Documentation that the organization must have as one of its primary purposes (as outlined in its bylaws, article of incorporation or charter) to provide financial assistance to small businesses.
- Provide a copy of their program implementation plan and process such as:
 - Application criteria
 - Underwriting and award criteria, including a copy of the application used for emergency assistance.
 - Performance report
- The sub-granted nonprofit must comply with all CDBG requirements.
- The sub-granted nonprofit must be the grantor of all grants and owner of all the grant agreements/contracts with the small business or microenterprise.

Documentation and Reporting

Documents needed to apply will be provided in the NOFA. Sub-grantees must be able to provide program implementation plan that gathers the following information;

- The need is a direct result of the effects of the COVID-19 crisis
- Provide Business Oregon with the application documents and policies the sub-grantee will use to determine business eligibility.
- If job creation/retainage – Provide self-certification job creation/ retainage report

Once all funds have been disbursed the program will be monitored and must report the number of jobs created or retained, the number of microenterprises assisted, and how did the funds impact the community.

All jobs created or retained must be for low- and moderate-income persons. Those employees must complete a self-certification at the time of disbursement. Reporting on all jobs retained or created will be required up to six months after funds are disbursed.

COVID-19 Impact Assistance

Who Can Apply

The state CDBG program is only available to non-entitlement cities or counties (cities or counties that don't have a direct allocation of CDBG funds from HUD).

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 carry out 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 urgent need in accommodation of facilities in respond to infectious disease.

Availability of Funds

As this criteria is to address Urgent Need, the availability of funds will be in alignment with the Chapter 14 - Emergency projects.

Note: 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 Amount

Will be identified in the NOFA

Grant Administration

Up to 10 percent of the grant award, but not more than \$35,000

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.

Emergency Childcare Assistance

This criteria is design to assist in providing childcare to Low and Moderate Income kids to allow parents to return back to work, through:

- Sponsoring LMI kids to existing childcare services(of which 100% of the sponsored must be LMI)
- Creating new program to provide childcare services. (which at least 51% LMI)
- Acquire, or rehabilitate (if necessary) a facility building to allow appropriate child care space to accommodate COVID-19 capacity limitation. *(for building related improvements max allowed will be in accordance to Public Facilities Improvements)*

Special Economic Development Assistance

- to support new businesses or business expansion to create jobs and manufacture medical supplies necessary to respond to infectious disease.

Eligible Activities are acquisition; clearance; construction; expansion; rehabilitation; machinery & equipment; working capital

Buildings (including Public Facilities) and Improvements

This program is grant dedicated to accommodate facilities necessary to Prepare, Prevent or Respond to infectious disease.

Eligible Activities

Buildings and Improvements, Including Public Facilities	
Acquisition, construction, reconstruction, or installation of public works, facilities, and site or other improvements. Rehabilitation of buildings and improvements (including interim assistance).	Food Bank
	Child Care Facilities
	Homeless Shelters
	Group living facility that may be used to centralize patients undergoing treatment.
Water Line Improvements	Water Distribution System improvements to allow reliable water service to support health services, school, distance learning and remote working for LMI communities

Eligible Costs (Refer to Chapter 5 for more details about eligible costs)

- Grant Administration, as detailed in Chapter 5.
- 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.
- 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. Complete the specialty calculations and detailed requirements for relocation activities, any applicant with a proposed project that involves relocation will be required by Business Oregon to hire a specialist acceptable to Business Oregon 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.

Ineligible Projects/Costs

- Buildings for the general conduct of government

- Typical government expenses
- Political activities
- 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.

Applications Process

Will be identified in the NOFA

Federal Requirements

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 within Chapter 7 of this Method of Distribution. More detailed information can be found in the Grant/Project Management Handbook and other resources available from Business Oregon. The CDBG Grant Management Handbook (2017 Edition) or most current edition, can be found on the [Department's website](#). Business Oregon 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.

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.

Public Services

This program is grant dedicated to provide new or quantifiable increased public services in response to infectious disease.

Who Can Apply

The state CDBG program is only available to non-entitlement cities or counties (cities or counties that don't have a direct allocation of CDBG funds from HUD).

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 carry out 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 urgent need in accommodation of services in respond to infectious disease.

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.

Joint Projects

This program is to benefit more than one jurisdiction combination of cities and counties in a regional or joint project. However, only one jurisdiction can be the applicant. 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 Business Oregon approved form of local government agreement for the region.

Intergovernmental Agreement (IGA)

The service area of the proposed Business Assistance Grant Program must be clearly defined and acknowledged by all the participating jurisdictions through an IGA or other Business Oregon 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 one other city/county jurisdictions to form a regional Small Business Assistance program. At a minimum, the agreement must clearly define:

- 1) The lead applicant;
- 2) The participating city/county jurisdictions;
- 3) The eligible non-profit organization that will be carrying-out the business assistance grant 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.

Availability of Funds

As this criteria is to address Urgent Need, the availability of funds will be in alignment with the Chapter 14 - Emergency projects.

Note: 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 Amount

Will be identified in the NOFA

Grant Administration

Up to 10 percent of the grant award, but not more than \$5,000

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.

Eligible Activities

Public Services	
Provision of new or quantifiably increased public services.	Carry out job training to expand the pool of health care workers and technicians that are available to treat disease within a community.
	Provide testing, diagnosis or other services at a fixed or mobile location.
	Increase the capacity and availability of targeted health services for infectious disease response within existing health facilities.
	Provide equipment, supplies, and materials necessary to carry-out a public service.
	Deliver meals on wheels to quarantined individuals or individuals that need to maintain social distancing due to medical vulnerabilities. Project Turnkey Operation Assistance: operation to expand capacity for non-congregate shelter during a pandemic.

Eligible Costs (Refer to Chapter 5 for more details about eligible costs)

- Training expenses
- Time and Material expenses to conduct eligible activities mentioned above
- Testing or diagnosis equipment
- Plan/ studies that would support the implementation of training/ all necessary health services for infectious disease response
- Grant Administration, as detailed in Chapter 5.
- Homeless service operation cost.

Ineligible Projects/Costs

- Expenses for already budgeted general conduct of government
- Political activities
- General operating and maintenance expenses
- Income payments—a series of subsistence type grant payments for food, clothing, housing, (rent and mortgage) or utilities.

Applications Process

Will be identified in the NOFA

Federal Requirements

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 within Chapter 7 of this Method of Distribution. More detailed information can be found in the Grant/Project Management Handbook and other resources available from Business Oregon. The CDBG Grant Management Handbook (2017 Edition) or most current edition, can be found on the [Department's website](#). Business Oregon 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.

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.

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Chapter 16 – COVID 19 Emergency Housing Related Assistance

Business Oregon will finance emergency housing related assistance to low- and moderate-income households 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.

Note: more detail guidance will be included within the NOFA – application guidance

General Description

Business Oregon will be awarding Community Development Block Grant-CV (CDBG-CV) funds to non-entitlement cities and counties for the implementation of eligible Emergency Housing Related Assistance programs. City/County applicants will apply for program funding and must sub-grant the funds to a organization that is eligible under 105(a)(8) of the Housing and Community Development Act (HCDA) to carry-out emergency housing related assistance activities and can document experience in providing housing related assistance.

Note: more detail guidance will be included within the NOFA – application guidance

Joint Projects

A combination of cities and counties can be involved in a regional or joint program. 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. Any one of the jurisdictions may take the lead and still allow the funds to be used in all jurisdictions as outlined in the Intergovernmental Agreement (IGA) or other approved form of local government agreement for the region.

Higher priority will be given to those projects servicing more than one area.

Intergovernmental Agreement (IGA)

This only applies if multiple jurisdictions and/or the applicant's service area is larger than the basic service area. The service area of the proposed emergency assistance project must be clearly defined and acknowledged by all the participating jurisdictions through an IGA or an 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 one other city/county jurisdiction to form a regional emergency housing related assistance program. At a minimum, the agreement must clearly define:

- The lead applicant;
- The participating city/county jurisdictions;
- The eligible 105(a)(15) organization that will be carrying-out the emergency rent and utility assistance program on behalf of the lead applicant; and
- 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.

Maximum Grant Amount

Will be identified in the NOFA.

Project Timeline

The CARES Act funds must be expended within one year after execution of award contract.

Matching Funds Requirement

There is no match requirement, however if matching funds are included in the project budget and necessary to complete the CARES Act project it must be in the form of cash only. 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 emergency housing related assistance programs must meet the public service emergency assistance benefit and the housing federal national objective as identified in 24 CFR 570.483(b)(2) and 24 CFR 570.483(b)(3). One-hundred percent (100%) of the benefitted households must have incomes at or below the federal low- and moderate-income limit (80% of the area median family household income as adjusted by household size). Refer to Chapter 3 for more information.

Mortgage, Rent and Utility Assistance

Program Structure

Community Development Block Grant funds are regulated by 24 CFR Part 570.489(e)(2)(ii). The applicant must ensure:

- The (sub-grantee) eligible organization carries out the emergency mortgage, rent and utility assistance 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 adheres to these requirements.
- Funds may be only be used for up to six (6) months mortgage, rent, and/or utility assistance. Assistance is available beginning with April 1, 2020 for mortgage, rent, and utilities, but not before.
- The program must be designed to pay past due mortgage, rent, and/or utilities for households that are 80% or below the local area median income by household size and income, for the area, and have been financially impacted by COVID-19.
- There must be adequate procedures in place to prevent any duplication of benefits. Tenants, landlords, and utility companies must sign an agreement that they aren't receiving emergency assistance funds from another source for the same period of time.
- Utility assistance programs can **only** help with power or gas utilities and can only assist with no more than six consecutive months of past due amount and must bring account current.
- Program must be marketed to the identified service area ensuring communities of color, or those households disproportionately affected by COVID-19, are engaged in the marketing effort. This may include developing marketing materials in other languages to ensure and understanding and awareness of the rental assistance program and its requirements.

Eligible Assistance

- The emergency rent and utility assistance must be a new program/service for the applicant; or a quantifiable increase in the level of a service. (This requirement is intended to prevent the substitution of CDBG funds for recent support of public services by using local or state government funds.)
- Tenants must be able to document hardship due to COVID-19, i.e. loss of job or reduction in hours, quarantined or family member quarantined. Possible documentation may include, but is not limited to notice of lay off, unemployment deposits, doctor's notice identifying COVID-19 likelihood, etc.
- Must be able to document hardship with letter or certificate from the landlord or utility bill.
- Landlord must sign certificate that the rent payment brings the tenant current and there is no other cause for eviction pending.
- Utility companies must sign certificate that the rent payment brings the tenant current.
- All payments will be made directly to the landlord or utility company to bring the tenant current, if the amount of the current or past due rent is at or less than the maximum amount allowable by the program.
- Only one application per household will be accepted but cannot exceed the max grant amount determined by a local rent reasonable analysis or six consecutive months' rent, whichever is less.
- Must document tenant has not received assistance for the same time period from other funding source(s).
- Payments cannot be made to family members.
- Rents cannot exceed [fair market rent \(FMR\) for the area](#).
- Mortgage funds must be used for a primary residence and may include other outstanding liens or loans against the property including a second mortgage or home equity line of credit. Rent funds must be used for a unit the tenant is currently residing in.
- Mortgage assistance can be provided to a single-family dwelling unit, townhome, condominium or modular home.
- Prior to funds being disbursed for emergency housing related assistance programs mortgage, rent, and/or utility information must be verified through the mortgagee, landlord (property owner), and/or utility company.

Ineligible Activities

- Payments made directly to tenant or family member of the tenant.
- Any payments beyond six consecutive months
- Water/sewer utility payments
- Hotel vouchers
- Security deposit
- Payments to households that exceed 80% of the AMI
- RV Parks
- The funds cannot be used for payment of special amenities, which may include but are not limited to cable, homeowner association fees, parking, pets, telephone, etc.

Owner Occupied Housing Rehabilitation

Program Structure

The CARES Act Housing Rehabilitation program must respond to living conditions (such as mold, lead-based paint, and poor ventilation) associated with more severe coronavirus disease or poorer post- COVID health outcomes by providing forgivable loans for rehabilitating homeowner housing to conform with standard building codes and public health advice.

- The (sub-grantee) eligible organization carries out the emergency 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 adheres to these requirements.
- Must assist households that are 80% or below the local area median income by household size and income, for the area, and have been financially or physically impacted by COVID-19.
- Program must be marketed to the identified service area ensuring communities of color, or those households disproportionately affected by COVID-19, are engaged in the marketing effort. This may include developing marketing materials in other languages to ensure and understanding and awareness of the rental assistance program and its requirements.
- This program is grant only and must be provided to homeowners as such, Type 2 (Chapter 12)
- Follow guidelines in Chapter 12 of the Method of Distribution of the CDBG Housing Rehabilitation program.

General Guidelines for all Emergency Housing Related Assistance Program(s)

Eligible Activities

The following table summarizes the eligible activities and the maximum amount allowed for each activity in the original grant from Business Oregon.

Eligible Activities	Maximum Allowed in Original Grant
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 award, but no more than \$25,000.
Program Management*: Work related to carrying out emergency housing related assistance activities, working directly with the LMI clients; such as: screening applicants, monitoring, etc. Program management is considered direct service to clients. Refer to Chapter 5 for more details.	Maximum allowed 20% of the award, but no more than \$35,000
Activities No more than three months current or past due rent or utility payment paid directly to landlord or utility company.	Maximum Grant to be determined in the NOFA, less the items listed above.

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, and other necessary documents.

Sub-Grant

The city or county grant recipient enters into a sub-grant agreement with an **eligible organization** to implement and **carryout** the emergency rental assistance activities. **All federal CDBG compliance requirements assigned to the sub-grantee remain the obligation of the original city/county funding recipient until administrative closeout of the CDBG grant with the state.**

Eligible (sub-grantee)

The sub-grantee must meet the following requirements by the department:

- Experience in providing/administering rental assistance or housing programs to low-moderate income households.
- Demonstrate adequate capacity to administer the emergency rental program.
- For rental assistance program, provide a copy of the rent reasonable standard that will be used to determine reasonable rent for the service area.
- Provide a copy of the document that will be used to determine need/assistance is based on the impact of the COVID 19 pandemic.
- Provide a copy of the organizations reasonable accommodation policy.
- Provide a copy of the organizations policy and procedures for the emergency rental assistance program.
 - The policies must include how income is documented and calculated – Calculation of income eligibility will begin at the time of tenant application and calculated six months into the future.
 - Must include how no duplication of benefit is being controlled and implemented.
- Provide a copy of the household application the sub-grantee will use to implement the program
- Copy of any documentation that the sub-grantee will use to certify the household has not received any duplication of benefit. The certification must be signed by the sub-grantee and the head of household.
- Must provide documentation that the household beneficiary is not residing in an entitlement area.

Program Implementation

The original sub-granted must carry-out the emergency housing related assistance program.

- The sub-granted is responsible for carrying out (implementing) the emergency housing related assistance program and will be the owner of all program policies and procedures.
- The sub-granted will be responsible to ensure the grant is used for activities that will meet the CDBG low and moderate public service national objective 24 CFR 570.483(b)(2).

Reasonable Accommodation Policies

As federally required, each sub-grantee must have reasonable accommodation policies for applicants. A copy of their reasonable accommodation policies must be submitted with the application.

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 sub-grantee emergency rent and utility assistance 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, Marion County, Medford, Portland, Redmond, Salem, and Springfield) within their service area, that applicant must provide documentation with the application to satisfy the following:

- Documentation of the screening procedures, forms and policies used to determine if the beneficiaries of the tenant Emergency Rental Assistance Program are entitlement or non-entitlement residents.
- Documentation that ensures that CDBG funds are only benefitting non-entitlement residents.

Outcome and Performance Measures:

Decent affordable housing as a housing program that meets individual household 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 households that received emergency rental assistance: <ul style="list-style-type: none"> • Number subsidized by federal, state, or local program • Number occupied by elderly (head of household or spouse age 60 or older) • Number of households effected by COVID-19 • Number of first responders or hospital workers receiving assistance 	Number of households assisted
			Race, ethnicity, disability (current categories for beneficiary reporting still apply)

Chapter 17 – Outcome and Performance Measure Reporting

Summary of CDBG Projects Funded

During Consolidated Plan Year 2016 – 2020

Code Index			
Outcomes →	Availability/Accessibility	Affordability	Sustainability
Objectives ↓			
Decent Housing	DH1	DH2	DH3
Suitable Living Environment	SL1	SL2	SL3
Economic Opportunity	EO1	EO2	EO3

Summary of CDBG Project Funded for 2020

Program Year 2017 data through December 31, 2020, (including 1st round of application) and accrued data from January 1, 2016 to December 31, 2020

Program Year 2020 Data				OUTCOMES [See note #1 below]				
Outcome/ Objective	Funding Category	Performance Indicators [See note #2 below]	Actual Number Funded in 2020	Total Number Funded by 12-31-2020	Short Term Annual Goal	Actual Number Funded in 2020 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
SL3	Public Works – Water/Wastewater	Number Systems Assisted	5	20	Fund 2 systems per year	3(150%)	Assist 10 systems	18(180%)
		Total Persons Assisted	12006	30282				
		Total LMI Persons Assisted	6380	17367				
		Funds Leveraged	2500	4848007				
SL1/SL3/DH1		Total Facilities Assisted	2	11		2(150%)		11(175%)

	Public/Community Facilities (fire stations, libraries, senior centers, food banks, family resource centers, community centers), (SL1) 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 (DHI)	Total Persons Assisted	7,928	21,909	Fund 1 projects per year		Assist 7.5 facilities	
		Total LMI Persons Assisted	9,456	12,725				
		Funds Leveraged	\$35,000	\$3,144,460				
DH3	Housing Rehabilitation	Total Number of Units rehabbed	171	361	Fund 6 projects per year (100 Housing Unit)	7 (116%) 171 unit (170%)	Fund 30 projects	29(96.6%)
		Funds Leveraged	\$0	\$0				
EO3	Public Services-Microenterprise Assistance	Total Microenterprises Assisted	5	249	Fund 3 projects per year. (100 MicroE Assisted)	100 (100%)	Fund 15 projects or (500 Microenterprises assisted)	7 (47%) 275 MicroEnterprise assisted (49%)
		Total LMI Microenterprises Assisted	75	275				
		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	20	32	Fund 3 per year	20 (600%)	15 training events funded	36 (204%)
		Number of Attendee's	377	1385				

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.
- 2 year PCD—Planning/Final design only grants, construction only grants, public/community facility and housing rehabilitation grants.

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.

APPENDIX G.

ESG WRITTEN STANDARDS

Annual Emergency Solutions Grant Program (ESG)

Written Standards

Subgrantees and subrecipients 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. The following minimum program standards are required for delivering the ESG program as outlined in CFR 576.400 (c) (3):

1. Evaluating Eligibility for Assistance

Subgrantees and subrecipients are required to actively participate in and promote the Continuum of Care (CoC) coordinated entry process for their service area, including utilizing standard COC assessment tools and protocols once they are established. Subgrantees and subrecipients 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 area median family income **and** the household continues to lack sufficient resources and support networks needed to retain housing without ESG assistance. Meeting the definition of homelessness is not a requirement of re-evaluation for continued receipt of homelessness prevention and rapid re-housing assistance. If a client household informs, but is not required to notify the subgrantee and subrecipient 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 and subrecipient until the next required re-evaluation. There is no HUD or OHCS requirement that the client notify the subgrantee and subrecipient of changes to income prior to the required re-evaluations as specified above.

2. Targeting and Providing Essential Services Related to Street Outreach

To complete Street Outreach activities, subgrantees and subrecipients must seek out 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 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, people or persons who are disabled, elderly, etc.

Engagement activities must include an initial assessment of needs and eligibility in order to prioritize the most beneficial type and source of assistance, with safety and health being the highest priority needs. 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.

3. Emergency Shelter Operations

a) Admission

Subgrantees and subrecipients must 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 and subrecipient determined eligibility criteria. The assessment process and tools must meet the service area's Continuum of Care coordinated entry requirements (24 CFR 576.400(d) once developed.

b) 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.

c) Essential Services and Referral

Emergency shelter participants and persons receiving hotel/motel vouchers must have access to essential services through direct service delivery by the subgrantee and subrecipient and/or provision of information and referral to other service providers.

Essential services include: case management; child care; education services, employment assistance and job training; outpatient health services; 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.

d) *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' and subrecipients' policies and procedures governing shelter operations.

e) *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.

f) *Non-Discrimination*

Subgrantees and subrecipients 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.

g) *Reasonable Accommodations*

Reasonable accommodations for persons with disabilities must be available in order to ensure persons with disabilities 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.

h) *Limited English Proficiency*

Subgrantees and subrecipients must have a written Limited English Proficiency policy in place that ensures access to shelter facilities, assistance and services for limited English proficiency (LEP) persons. It is highly recommended that subgrantees and subrecipients 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.

i) *Domestic Violence*

Domestic violence victims and other persons in need of victim services must have access to a safe setting and have their identity protected. Subgrantees and subrecipients 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 and subrecipients must also certify that the address of a family/individual violence shelter will not be made public without permission of the shelter agency.

Shelters for domestic violence survivors must adhere to the following shelter policies and procedures:

- 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 whom 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.

4. Assessing, Prioritizing and Reassessing Needs for Essential Services Related to Emergency Shelter

Subgrantees and subrecipients 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 and subrecipients 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 and subrecipient's targeted populations.

Provision of essential services and shelter must be available to shelter residents and persons receiving hotel/motel vouchers, 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.

5. Coordination Among Homeless Assistance Providers, Mainstream Service Providers and Housing Providers

Subgrantees and subrecipients 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 support of the subgrantee's and subrecipient's plan for utilizing ESG funds as part of the subgrantee's biennial funding application to the state.

6. 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 entry process 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 at 30% or below 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 and subrecipient's service area homeless plan(s) 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 and subrecipient 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.

7. Determining Client's Share of Rent and Utility Costs

Subgrantees and subrecipients 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 subrecipient and

communicated in advance to the client. Subgrantees and subrecipients 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 (up to 6 months past due utilities), 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 and subrecipient 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 un-used utility deposits be returned to households when feasible.

8. Determining Duration and Amount of Rental Assistance Provided to Client

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 and subrecipient 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 and subrecipient'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, prospective 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 the 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 of past due rent.

9. Determining Type, Amount, and Duration of Housing Stabilization and/or Relocation Services Provided to Client

a) Eligible Activities

Type of Housing Stabilization and/or Relocation Services is limited to financial assistance costs and service costs, subject to the general conditions and restrictions identified under 24 CFR 576.103 and 576.104. Security deposits are limited to no more than 2 month's rent. A last month's rent must not exceed one month's rent and must be included in calculating the program participant's total rental assistance, which cannot exceed 24

months during any 3-year period. Utility payments are limited to up to 24 months within a 3-year period per client, per service, including up to 6 months of arrears, per service. Eligible utility services are gas, electric, water, and sewage. Temporary storage fees associated with moving costs are limited to up to 3 months, provided that the fees are accrued after the date the program participant begins receiving assistance.

b) Housing Search/Stabilization/Relocation Services

ESG funds may be used to pay cost of assessing, arranging, coordinating, and monitoring the delivery of individualized services to facilitate housing stability for a program participant who resides in permanent housing or to assist a program participant in overcoming immediate barriers to obtaining housing. This assistance cannot exceed 30 days during the period the program participant is seeking permanent housing and cannot exceed 24 months during the period the program participant is living in permanent housing.

c) Other Eligible Services

Mediation services are allowable, provided that the mediation is necessary to prevent the program participant from losing the permanent housing in which the client currently resides. Legal services must be necessary to resolve a legal problem that prohibits the client from obtaining permanent housing or will likely result in the client losing the permanent housing in which they currently reside. Credit repair does not include the payment or modification of a debt.

d) Ineligible Services

Financial assistance cannot be provided to a client who is receiving the same type of assistance through other public sources or to a client who has been provided with replacement housing payments under the URA during the period of time covered by the URA payments.

e) Duration of Services and Participant Financial Responsibility

The subgrantee and subrecipient may set a maximum dollar amount that a client may receive for each type of financial assistance and may set a maximum period for which a client may receive any of the types of assistance or service. However, except for housing stability case management, the total period for which any client may receive assistance must not exceed 24 months during any 3-year period. The limits on the assistance apply to the total assistance an individual receives, either as an individual or as part of a household.

Emergency Solutions Grant – Coronavirus Program (ESG-CV)

Written Standards

Subgrantees and subrecipients are required to comply with OHCS' state minimum standards for providing ESG-CV assistance, or standards relevant to ESG-CV that are required by their Continuum of Care. The minimum standards set by OHCS follow:

1. Standard policies and procedures for evaluating individuals' and families' eligibility for assistance under ESG-CV.

Subgrantees and subrecipients are required to actively participate in and promote the Continuum of Care (CoC) coordinated entry system (CES) for their service area, but may modify the assessment and eligibility determination process to identify and expedite services for households impacted or at risk because of the COVID pandemic.

Also, agencies may make changes to the standard assessment process if the current process puts agency staff at risk of COVID exposure. Subgrantees and subrecipients may choose to utilize a different intake and assessment system for victims of domestic violence and other crimes where safety is a predominant concern.

NOTE: The requirements to use the CoC's coordinated assessment, administer the assistance in accordance with written standards and participate in HMIS were waived for the first 60 days of the federal allocation of funds in 2020.

The minimum eligibility process for persons seeking services 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, subgrantee staff will complete a more comprehensive assessment to verify applicant's homeless status and determine which ESG-CV service components will address their housing need. Eligibility determinations must be documented in client files and preferably through third-party documentation. In an effort to quickly place homeless households in non-congregate housing, the 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 or impractical.

Gross income is determined by using the household's present income, not the income the household had before the coronavirus pandemic.

Subgrantees may provide Rapid Re-Housing financial assistance, rent subsidy, and stabilization services to households who are already in housing if they qualified as homeless immediately before moving into their current housing and if they meet both of the following criteria: the household does not have sufficient support or resources

needed to retain their current housing without ESG assistance; and their current rent assistance is time-limited and provided through a homeless assistance program other than an ESG program. The ESG RRH rent assistance must not overlap the current assistance and there must be no more than the equivalent of a one month period between the end of the current assistance and the start of the ESG RRH assistance.

Homeless households placed in housing or receiving services through Rapid Re-Housing do not need to meet an income threshold until their annual re-evaluation. For continued receipt of Homelessness Prevention assistance, household income must be re-evaluated every 6 months. For Homelessness Prevention, this is a modification of the federal rule. This modification ends March 31, 2022. Minimally, each re-evaluation of eligibility must verify that the client household's annual income has not exceeded the maximum allowable and the household continues to lack sufficient resources and support networks needed to retain housing without ESG-CV assistance. Meeting the definition of homelessness is not a requirement of re-evaluation for continued receipt of homelessness prevention and rapid re-housing assistance.

If a client household informs, but is not required to notify, the subgrantee or subrecipient 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 or subrecipient until the next required re-evaluation.

2. Standards for targeting and providing essential services related to street outreach.

COVID-19 related Street Outreach consists of activities carried out to keep people healthy, reduce risk of exposure and avoid or slow the spread of the disease. To complete Street Outreach activities, subgrantees and subrecipients must seek out and engage unsheltered homeless individuals and/or families. It is recommended that preference be given to those 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, people or persons who are disabled, elderly, etc., or most susceptible to exposure, contraction or spreading of the coronavirus.

Engagement activities must include an initial assessment of needs and eligibility in order to prioritize the most beneficial type and source of assistance, with safety and health being the highest priority needs. Whenever feasible, rapid re-housing will be a priority over the provision or referral to emergency shelter or transitional housing.

3. Policies and procedures for admission, diversion, referral, and discharge by emergency shelters assisted under ESG-CV, including standards regarding length of stay, if any, and safeguards to meet the safety and shelter needs of special populations, e.g., victims of domestic violence, dating violence, sexual assault, and stalking; and individuals and families who have the highest barriers to housing and are likely to be homeless the longest.

a) Admission to Temporary Emergency Shelter

Temporary Emergency Shelters (TES) can be used during the COVID-19 pandemic to assist homeless persons who have been impacted economically or health-wise by the pandemic, or who need to have non-congregate shelter as protection from the pandemic. Applicant households must be assessed to confirm they meet HUD's definition of homeless.

TES operations will end when the shelter is no longer needed or on January 31, 2022, unless HUD grants an exception upon OHCS's written request, which must include subgrantee's plan to connect program participants to permanent housing when the temporary emergency shelter is no longer funded.

Program participants cannot be required to sign leases or occupancy agreements, receive treatment, or perform any other prerequisite activities as a condition for staying in any shelter or receiving services.

b) Admission to Emergency Shelter

The costs of serving homeless persons in emergency shelter are eligible for payment with ESG-CV if the admission is an effort to prevent, prepare for, or respond to the coronavirus pandemic. Subgrantees and subrecipients must complete standardized screening and intake to determine eligibility for admission to emergency shelter. Admission must comply 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.

c) Diversion from Shelter

Based on screening results and confirmation of COVID-19 impact, 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.

d) Essential Services and Referral

Shelter participants and persons receiving hotel/motel vouchers must have access to essential services through direct service delivery by the subgrantee and subrecipient and/or provision of information and referral to other service providers. Essential services include: case management; child care; education services, employment assistance and job training; outpatient health services; 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.

e) Shelter 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-CV funds are provided. Limitations on individual and family shelter stays, if any, must be identified in writing in

the subgrantees' and subrecipients' policies and procedures governing shelter operations.

f) *Safety and Accommodations for Special Populations*

Any shelter facility that receives ESG-CV assistance for operation, conversion, major rehabilitation, or renovation 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.

g) *Non-Discrimination*

Subgrantees and subrecipients 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 facilities and assistance.

h) *Reasonable Accommodations*

Reasonable accommodations for persons with disabilities must be available in order to ensure persons with disabilities have an equal opportunity to utilize facilities and receive essential services. Greater levels of accessibility may be required for some shelters in compliance with The Americans with Disabilities Act.

i) *Limited English Proficiency*

Subgrantees and subrecipients must have a written Limited English Proficiency policy in place that ensures access to shelter facilities, assistance and services for limited English proficiency (LEP) persons. It is highly recommended that subgrantees and subrecipients 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.

j) *Domestic Violence*

Domestic violence victims and other persons in need of victim services must have access to a safe setting and have their identity protected. Subgrantees and subrecipients 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 and subrecipients must also certify that the address of a family/individual violence shelter will not be made public without permission of the shelter agency.

Shelters for domestic violence survivors must adhere to the following shelter policies and procedures:

- 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 whom 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.

4. Policies and procedures for assessing, prioritizing, and reassessing individuals' and families' needs for essential services related to emergency shelter.

Subgrantees and subrecipients must develop and use written policies for standardized screening and intake to assess a household's service needs while the household is in temporary or emergency shelter due to an economic or health impact of COVID-19. However, individuals and families experiencing homelessness must not be required to receive treatment or perform any other prerequisite activities as a condition for receiving shelter.

Provision of essential services and shelter must be available to persons receiving hotel/motel vouchers, for at least the time period during which the ESG-CV funds are provided.

The requirement that subgrantees develop service prioritization in consultation with service area homeless providers and their Continuum of Care **is waived** for ESG-CV 1 and 2.

5. Policies and procedures for coordination among emergency shelter providers, essential services providers, homelessness prevention, and rapid re-housing assistance providers; other homeless assistance providers; and mainstream service and housing providers (see §576.400(b) and (c) for a list of programs with which ESG-funded activities must be coordinated and integrated to the maximum extent practicable).

For ESG-CV 1 and 2 funds, the requirement to coordinate with other homeless assistance providers and mainstream resources **is waived**.

6. Policies and procedures for determining and prioritizing which eligible families and individuals will receive homelessness prevention assistance and which eligible families and individuals will receive rapid re-housing assistance (these policies must include the emergency transfer priority required under §576.409).

Homeless Prevention

Determination of eligibility for homeless prevention assistance requires an in-person assessment to verify that applicants have been impacted by the COVID-19 pandemic, 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 at 50% or below of area median income. 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.

Prioritizing households for homeless prevention assistance must follow the Continuum of Care standards and CES process, and align with coronavirus planning and community assessments for the service area.

Rapid Re-Housing

Determination of eligibility for rapid re-housing assistance requires an initial assessment to verify that the applicant meets HUD's categorical definition for literally homeless or fleeing/attempting to flee domestic violence and being homeless. Homeless status must be documented in client files in accordance with HUD documentation standards with preference given to third-party verification where available.

Households that were homeless before receiving time-limited rent assistance through a non-ESG source may also qualify for RRH assistance. Subgrantee must confirm the household does not have the resources or support needed to retain their housing without ESG RRH assistance.

Prioritizing households for rapid re-housing assistance must follow the Continuum of Care standards and CES process, and align with coronavirus planning and community assessments for the service area.

7. Standards for determining what percentage or amount of rent and utilities costs each program participant must pay while receiving homelessness prevention or rapid re-housing assistance;

Subgrantees and their subrecipients must comply with existing Continuum of Care standards for determining client's required share of rent and utility costs. State minimum standards require that the rent assistance model chosen must be consistently implemented for all households within each ESG-CV 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 subrecipient and communicated in advance to the client. Subgrantees and subrecipients 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 (up to 6 months past due utilities), 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. Subgrantees should encourage clients to access energy assistance programs as a first option in providing utility assistance. It is recommended that un-used utility deposits be returned to households when feasible.

8. Standards for determining how long a particular program participant will be provided with rental assistance and whether and how the amount of that assistance will be adjusted over time;

Rent assistance can be either short term (0 – 3 months duration) or medium term (0 – 24 months duration) within a 3-year time period. This is a waiver of ESG regulations which state medium term rent can be for 24 months in a three year period. 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 served with ESG-CV funds.

Rent arrearage assistance is defined as: past due rent owed to a current, prospective 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 the 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 of past due rent.

9. Standards for determining the type, amount, and duration of housing stabilization and/or relocation services to provide to a program participant, including the limits, if any, on the homelessness prevention or rapid re-housing assistance that each program participant may receive, such as the maximum amount of assistance, maximum number of months the program participant receive assistance; or the maximum number of times the program participant may receive assistance.

Eligible Activities:

a) Financial Assistance

Housing Stabilization and/or Relocation Services include Financial Assistance, which must follow the general conditions and restrictions identified under 24 CFR 576.103 and 576.104. Security deposits are limited to no more than 2 month's rent. A last month's rent must not exceed one month's rent and must be included in calculating the program participant's total rental assistance, which cannot exceed 24 months during any 3-year period. Utility payments are limited to up to

24 months within a 3-year period per client, per service, including up to 6 months of arrears, per service. Eligible utility services are gas, electric, water, and sewage. Temporary storage fees associated with moving costs are limited to up to 3 months, provided that the fees are accrued after the date the program participant begins receiving assistance.

b) *Housing Search/Stabilization/Relocation Services*

ESG-CV funds may be used to pay costs of assessing, arranging, coordinating, and monitoring the delivery of individualized services to facilitate housing stability for a program participant who resides in permanent housing or to assist a program participant in overcoming immediate barriers to obtaining housing. This assistance cannot exceed 30 days during the period the program participant is seeking permanent housing and cannot exceed 24 months during the period the program participant is living in permanent housing.

c) *Rental Assistance*

Households can be provided Rental Assistance in the Homelessness Prevention and Rapid Re-housing categories. Homelessness Prevention rent subsidy is intended to prevent persons who are housed from becoming homeless by helping them regain stability in their current housing or other permanent housing. Eligible households must meet the appropriate HUD definition for at-risk, and must have an income no greater than 50% AMI. To qualify for Rapid Re-housing rent assistance, a household must meet the HUD definition of homeless. For both subsidy categories, rent assistance with ESG-CV funds can be no longer than 24 months within a 3 year period.

d) *Other Eligible Services*

Mediation services are allowable, provided that the mediation is necessary to prevent the program participant from losing the permanent housing in which the client currently resides. Legal services must be necessary to resolve a legal problem that prohibits the client from obtaining permanent housing or will likely result in the client losing the permanent housing in which they currently reside. Credit repair does not include the payment or modification of a debt.

e) *Duration of Services and Participant Financial Responsibility*

The subgrantee and subrecipient may set a maximum dollar amount that a client may receive for each type of financial assistance and may set a maximum period for which a client may receive any of the types of assistance or service. However, except for housing stability case management, the total period for which any client may receive assistance must not exceed 24 months during any 3-year period. The limits on the assistance apply to the total assistance an individual receives, either as an individual or as part of a household.

f) *Ineligible Services*

Financial assistance cannot be provided to a client who is receiving the same type of assistance through other public sources or to a client who has been provided with replacement housing payments under the URA during the period of time covered by the URA payments.

APPENDIX H.

OHCS RESIDENTIAL ANTI-DISPLACEMENT AND RELOCATION ASSISTANCE PLAN

STATE OF OREGON

RESIDENTIAL ANTIDISPLACEMENT AND RELOCATION ASSISTANCE PLAN

The State of Oregon administers federal funds from the U.S. Department of Housing and Urban Development (HUD) under a HUD-approved Consolidated Plan for Housing and Community Development. This “Residential Anti-displacement and Relocation Assistance Plan” is required for two programs covered by the State’s Consolidated Plan.

Units of general local government (cities and counties) funded by the State are required to follow the State’s plan unless they develop their own plan. A city or county that develops its own plan must adopt the plan and make it public.

PART A. STATE PROGRAMS COVERED BY PLAN

1. HOME Investment Partnerships Program (HOME)

- Statutory requirement : Section 105(b)(14) of the Cranston-Gonzalez National Affordable Housing Act (NAHA)
- Program regulations : 24 Code of Federal Regulations (CFR) Part 92.353 (Displacement, relocation and acquisition) and 24 CFR Part 42 (Displacement, Relocation Assistance, and Real Property Acquisition for HUD and HUD-Assisted Programs)
- Responsible state agency : Oregon Housing and Community Services Department, Housing Resources Section

2. Community Development Block Grant (CDBG)

- Statutory requirement : Section 104(d) of the Housing and Community Development Act of 1974
- Program regulations : 24 CFR Part 570.606(c) (Displacement, relocation and acquisition, and replacement of housing) and 24 CFR Part 42 (Displacement, Relocation Assistance, and Real Property Acquisition for HUD and HUD-Assisted Programs)
- Responsible state agency : Oregon Business Development Department

PART B: STEPS TO MINIMIZE DISPLACEMENT

The State will minimize the displacement of families and individuals from their homes and neighborhoods as a result of Community Development Block Grant activities by requiring recipients of program funds to take the following steps, consistent with other goals and objectives of programs covered by 24 CFR Part 92 and 24 CFR Part 570:

1. Seek unimproved or vacant properties for project activities to eliminate displacement of tenants.
2. Stage rehabilitation of multi-family projects to allow tenants to remain in the building/complex during and after the rehabilitation, working with empty units first.
3. Arrange for facilities to house persons who must be relocated temporarily during rehabilitation.
4. Provide counseling assistance to assist homeowners and renters to understand the range of assistance that may be available to help them stay in their neighborhood.

PART C: RELOCATION ASSISTANCE FOR DISPLACED PERSONS

State recipients shall be required to provide for relocation assistance in accordance with 24 CFR Part 42.350. The State will provide technical assistance to recipients. Community Development Block Grant funds may be used for relocation payments.

PART D: ONE-FOR-ONE REPLACEMENT OF LOWER-INCOME DWELLING UNITS

The State will ensure that recipients comply with the requirements of 24 CFR Part 42.375 for the replacement of all occupied and vacant occupiable lower-income dwelling units that are demolished or converted to another use other than as lower-income dwelling units in connection with a Community Development Block Grant assisted activity.

If funds will be used for any activity that will directly result in the demolition of lower-income dwelling units or the conversion of lower-income dwelling units to another use, the State will require the Community Development Block Grant recipient to make public and submit to the responsible State agency, in writing, the following information:

1. A description of the proposed activity;
2. The location on a map and number of dwelling units by size (number of bedrooms) that will be demolished or converted to another use other than for lower-income dwelling units as a direct result of the assisted activity;
3. A time schedule for the commencement and completion of the demolition or conversion;

4. The location on a map and the number of dwelling units by size (number of bedrooms) that will be provided as replacement dwelling units. If such data is not available at the time of the general submission, the submission shall identify the general location on an area map and the approximate number of dwelling units by size, and information identifying the specific dwelling units by size shall be submitted and disclosed to the public as soon as it is available;
5. The source of funding and a time schedule for the provision of replacement dwelling units;
6. The basis for concluding that the replacement housing will remain a lower-income dwelling unit for at least 10 years from the date of initial occupancy; and
7. Information demonstrating that any proposed replacement of dwelling units with smaller dwelling units (e.g., a 2-bedroom unit with two 1-bedroom units) is consistent with the needs assessment contained in the State of Oregon Consolidated Plan. A unit of general local government funded by the State must also make public information demonstrating that the proposed replacement is consistent with the housing needs of lower-income households in the jurisdiction.

The above information shall be submitted before funds are committed by the State or by the unit of general local government for Community Development Block Grant activities.

Recipients shall follow their regular local practice for public notice. The State will forward information submitted by recipients to the Oregon State Office of the U.S. Department of Housing and Urban Development

APPENDIX I.

NATIONAL HOUSING TRUST FUND ALLOCATION PLAN



Oregon Housing and Community Services

**NATIONAL HOUSING TRUST FUND
(HTF)
2021 PROGRAM MANUAL**

Effective as of January 20, 2021

2020 HTF Program Manual Index

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National Housing Trust Fund (HTF) 2020 Funding Manual

Introduction

The National Housing Trust Fund (HTF) is a formula grant program administered by states which is intended to increase and preserve the supply of decent, safe, sanitary, and affordable housing, primarily rental housing, for extremely low-income and very low-income households.

In January 2015, HUD published an Interim Rule to guide implementation of the Housing Trust Fund. The Interim Rule is still currently in use and structured to mirror the HOME Program regulations in an effort to consolidate largely similar programs, improve the coordination of local and regional planning efforts and activity delivery, and reduce the administrative burden placed on grantees overall.

OHCS uses HTF as a funding source to support Projects applying for other State-administered affordable housing resources. Projects requesting HTF must comply with the requirements included in this manual and are also subject to the provisions of the OHCS General Policy and Guideline Manual (GPGM), which establishes relevant uniform policies applicable to the funding of all OHCS Projects. The requirements of any program from which funding is requested and any other applicable requirements, such as those published in the OHCS NOFA, applicable statutes, administrative rules, or state and federal regulations must be satisfied by the HTF recipient if required by OHCS.

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." Federal regulations for the HTF Program can be found in 24 CFR Part 93.

State Consolidated Plan Consistency

Consistent with the HTF Interim Rule, the regulations for the Consolidated Plan are applied to the HTF program. As a result, the HTF allocation plan is consistent with Oregon's Citizen Participation Plan, Strategic Plan, and Annual Action Plan. The HTF Allocation Plan, approved by HUD, describes 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. The OHCS HTF Allocation Plan can be found as Attachment Z of the State Consolidated Plan.

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.

HTF Program Deadlines

In accordance with federal regulations, HTF Program funds must meet the following guidelines:

- Commitment: HTF resources must be committed (loan documents closed) to eligible Projects within 24 months of the annual HUD HTF allocation to OHCS. As such, OHCS will prioritize Projects that can move quickly to meet this deadline
- Construction: Once HTF funding is committed at construction closing, the Project must begin construction within 12 months. OHCS may rescind reservations for Projects that do not meet program deadlines. HTF funded Projects not completed within 4 years of commitment will be terminated and HTF funding must be repaid to HUD.

Occupancy: HTF recipients must ensure that HTF-assisted rental units are occupied by income-eligible households within 6 months of Certificate of Occupancy. If any HTF assisted unit remains unoccupied for six months following completion, the recipient must develop an enhanced marketing plan and report this information OHCS. If HTF-assisted units remain unoccupied at 18 months after Certificate of Occupancy, the unit has not met the purpose of the HTF Program, and the costs associated with the unit are ineligible. Federal regulation requires HTF funding to be repaid for any HTF-assisted unit vacant at 18 months after Certificate of Occupancy.

Eligible Projects

Projects proposed for HTF funding must provide **permanent rental housing**. HTF funding is available to projects statewide. 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) only if included in the Oregon Consolidated Plan.

An eligible HTF Project consists of one or more buildings on a single site or multiple sites, which is under common ownership, management, and financing, and is part of a single undertaking. HTF assisted Projects may be privately or publicly owned and contain any number of units, and any combination of unit sizes and styles.

Tenant Protections and Selection

Special Needs Projects: To utilize HTF funding in Projects intended to house special needs population, Applicants must certify to the following requirements:

- **Lease Agreement:** A one-year lease agreement must be offered to tenants in HTF assisted units. In addition to the one-year term, the lease must stipulate that termination or refusal to renew must be based on serious or repeated violation of the terms and conditions of the lease and be served to the tenant in writing, must specify the grounds for the action, and provide a minimum of 30 day notice before termination of tenancy. For more information on required and prohibited lease provisions, see 24 CFR 93.303(b).
- **Services:** While OHCS recognizes that appropriate supportive services must be available to help tenants with special needs live as independently as possible, services cannot be required as a condition of tenancy in an HTF assisted Project providing permanent housing.
- **Affirmative Marketing Requirements:** HTF assisted Projects of five or more units must be affirmatively marketed to all persons within the special needs group. Referrals from a single source or specific social service agency cannot be used exclusively to fill the units. A good faith effort must be made to inform and solicit applications from members of the special needs group throughout the market area. (Group Homes are considered to be "one" assisted unit).

Please Note: Unless the project receives development or operating funding for a specific disabled population, HTF assisted Projects that are designated for persons with disabilities cannot be restricted to persons with specific types of diagnoses or subclasses of disabilities. Resident services may be specific to subclasses of disabilities, but the housing may not. HTF assisted housing for disabled persons must be open to qualified persons with any type of disability.

Single Room Occupancy Projects: For new construction, conversion of non-residential space, or reconstruction Projects with Single Room Occupancy (SRO) units, each SRO unit must contain either food preparation or sanitary facilities (or both). For acquisition or rehabilitation of an existing residential structure, neither food preparation nor sanitary facilities are required in each SRO unit. If individual units do not contain sanitary facilities, they must be provided in the building for tenants to share.

Group Homes: Group homes are typically a shared residence where tenants have a private bedroom but share kitchen, bathroom, and common living space. A group home is considered to be a one-unit Project. The HTF subsidy maximum is based on the actual number of bedrooms in the group home, while rent limits are based on the actual number of tenants in the Project (not including a bedroom for live-in caregiver).

Projects / Activities Not Eligible for HTF

Transitional housing, overnight shelters, public facilities, residential care facilities, student housing, or housing for workers on a seasonal basis, nursing homes, hospitals, residential treatment facilities, dormitories, or correctional facilities are not eligible for HTF funding.

Debt Reduction is Ineligible: The proposed Project must create and/or preserve affordable housing. Requests for funds to buy-down or refinance current debt are not eligible for OHCS HTF funding.

Construction Prior to Application: Projects that have started construction or rehabilitation or have executed contracts for construction work prior to submission of the NOFA application are not eligible for HTF funding.

Eligible Project Costs

HTF can be used for the following:

- Real property acquisition
- Site improvements and development hard costs
- Related soft costs
- Demolition
- Relocation assistance

Acquisition Costs: Costs of acquiring improved or unimproved real property. Acquisition costs must be supported by an appraisal. Acquisition cost must be the same or less than the market value established by an appraisal.

Site Improvements: Generally, HTF funds can pay for site improvements that are in keeping with improvements of surrounding Projects. Site improvements may include on-site roads and sewer and water lines necessary to the development of the Project.

Relocation Costs: HTF funds may pay for the relocation costs of individuals, families, and businesses permanently or temporarily displaced by the Project.

Developer's Fee: Funding of a developer's fee with HTF funds is an eligible expense. OHCS may release up to 50 percent of the applicant's portion of the developer fees upon 50 percent of Project completion if the applicant can demonstrate there is a need for development fees in order for the Project to proceed. Submit a request for developer fees in writing. OHCS will not release the balance of the developer fees until a Certificate(s) of Occupancy is in place and HTF close-out requirements have been met.

Costs Incurred Prior to Grant Agreement: HTF funds cannot be used to reimburse recipients for costs incurred prior to execution of the HTF Grant Agreement. Currently the understanding of "costs incurred" includes any obligations incurred due to contractual agreements to perform work. **Therefore do not enter into an agreement or contract to be paid with HTF funds until the HTF Grant Agreement has been executed.**

Incurring costs may also include entering into an earnest money or sales agreement for acquisition and such agreements should be contingent upon receipt of HTF funds. There is one exception. Some pre-development costs incurred prior to execution of the HTF Grant Agreement (and no earlier than 6 months before application) may be eligible for reimbursement with HTF funds. Reimbursement will be limited to the following costs: legal, consulting, environmental and other studies, engineering and design costs, zoning approvals, inspections and testing for hazards, costs related to obtaining site options, Project financing and fees for loan commitments. These activities must not have a physical impact on the site. OHCS must pre-approve any use of HTF funds for pre-development costs. Reimbursement will only occur after execution of the HTF Grant Agreement.

Ineligible Project Costs

Costs incurred prior to execution of the HTF Grant Agreement are not eligible for reimbursement with HTF funds, with the exception of very specific pre-development expenses which receive prior approval from OHCS. Signing a construction contract prior to execution of the HTF Grant Agreement may result in the Project being ineligible for HTF funding.

HTF funds may not be used for the following:

- Provide assistance to a project previously assisted with HTF funds during the affordability period;
- Pay for the acquisition of property owned by the grantee;
- Pay delinquent taxes, fees, or charges on properties to be assisted with HTF funds;
- Pay for political activities, advocacy, lobbying, counseling services, travel expenses, and preparing or providing advice on tax returns;
- Pay for administrative, outreach, or other costs to manage and operate the recipient of HTF funds;
- Pay for any cost that is not eligible under §92.731 and §92.732.

Project owners are prohibited from charging origination fees, or charge more than is customary for parking and laundry room use, among other fees. However, project owners may charge reasonable application fees to prospective tenants.

Eligible Recipients

Eligible recipients are project sponsors, developers, for-profit entities, non-profit entities, and housing authorities. Faith-based organizations are eligible to participate in the HTF program as provided in 24 CFR 92.257. 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.

An HTF Recipient Must:

- Make acceptable assurances to OHCS 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.

DUNS Number

A DUNS number, received at registration in the Central Contractor Registry is a requirement of every entity receiving federal funds. Verification of the registration is required prior to disbursement of HTF funds. Maintaining updated DUNS number through course of development is a requirement.

Forms of Assistance

HTF will be awarded in the form of a Grant and in an amount appropriate to the financing structure of the proposed Project. OHCS reserves the right to adjust the amount of HTF funding awarded to the proposed Project, prior to execution of the grant documents. Subsidy Layering Review of the Project requires examination of multiple factors including financial feasibility, demonstrated economic viability, and financing gap analysis. HTF Grants require execution and recordation of a Grant Agreement and an Assignment and Assumption Agreement and Declaration of Restrictive Covenants.

HTF Rent and Income Restrictions

HTF-assisted units are subject to tenant income and rent restrictions designed to keep rents affordable to extremely-low income tenants (30% of median). HTF rents plus utilities may not exceed the greater of 30% of the federal poverty line or 30% of the income of a tenant family whose annual income equals 30% of the median income for the geographic area, with adjustments for the number of bedrooms in the unit.

HTF rents and income limits are published by HUD on an annual basis. They are posted on the OHCS website.

Project-Based Rental Assistance: The HTF Program makes an exception to the gross rent limits for units with Project-based rental assistance. The Project-based program rent can be charged when tenants pay no more than 30 percent of their income for rent and tenant-paid utilities.

There is no exception to rent limits when an HTF assisted-unit is occupied by a tenant that has a tenant-based rental subsidy, since this subsidy is portable with the tenant.

Utility Allowance

HTF gross rents must include an allowance for the cost of utilities (other than telephone, cable television, or internet) that is paid directly by the tenant. The gross rent in an HTF unit must be reduced by the amount of the utility allowance in order to calculate the maximum tenant rent. HTF Recipients are required to obtain current and accurate utility allowance information which must be reviewed and approved by OHCS. The Utility Allowance established by the local Public Housing Authority is acceptable for HTF units in Projects that do not have other program requirements.

HTF-assisted Projects with funding from Rural Development or HUD that have Project-based rental assistance can use the Utility Allowance required by the rental assistance program. Units with tenant-based vouchers can also use the Utility Allowance required by the voucher program.

Other acceptable methods for determining a project's Utility Allowance include:

- HUD Utility Schedule Model, found at: <http://huduser.org/portal/resources/utlmodel.html>
- Energy Consumption Model

(Recipient must choose a pre-approved vendor from the OHCS list that can be found at:

<https://www.oregon.gov/ohcs/compliance-monitoring/Documents/memos/Approved-UA-Calculators.pdf>

Note: OHCS must approve utility allowances for HTF funded Projects. Documentation of the utility allowance calculation must be submitted with each proforma submission.

Period of Affordability

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**. The affordability requirements will be imposed by deed restrictions and use restrictions. If a project is terminated, the HTF recipient is obligated to repay all HTF funds invested in the project. The termination of the affordability restrictions on a project in foreclosure does not terminate the grantee's repayment obligation.

Maximum Per-unit Development Subsidy Limits

OHCS utilizes 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 the LIHTC program.

The maximum amount of HTF subsidy is limited by:

- The total per unit development costs: HTF assistance cannot exceed the actual per unit development costs for the HTF-assisted units in the Project;
- The financial needs of the Project: HTF Projects may not receive more subsidy than is required to produce a financially feasible Project;
- The number of HTF-assisted units in the Project: The HTF assistance cannot exceed the maximum subsidy allowed per unit.

The cost limits below, based on unit size, were established using a five year history of OHCS funded projects.

2019 (used in 2021 NOFA) Oregon LIMIT cost / unit	Studio	1 Bedroom	2 Bedroom	3 Bedroom	4 Bedroom
Urban*	\$231,000	\$281,000	\$330,000	\$374,000	\$394,000
Balance of State	\$182,000	\$220,000	\$270,000	\$308,000	\$341,000

*Urban definitions would apply in the Metro Region and to any project where the project meets two of the urban project criteria:

1. more than four (4) stories;
2. elevator;
3. required structured parking;
4. located on urban infill site.

HTF Designated Unit Allocation

In most HTF funded Projects (excluding group homes) not all units must be HTF-assisted. Consequently, it is necessary to distinguish between HTF-assisted and other units. HTF Applicants can estimate the number of HTF units for their project using the HTF Checklist in Section 8 of the NOFA Application. In accordance with HUD regulation, OHCS will confirm the number and bedroom size of designated HTF- assisted units for each HTF funded Project at the time of construction/equity closing. This will be based on the Project’s final budget after construction bids have been accepted and final sources and uses have been balanced.

HTF may pay only actual costs of HTF-assisted housing. If the units in a Project are comparable in terms of size, features, number of bedrooms, and amenities then the actual costs can be determined by pro-rating total (HTF-eligible) development costs, then HTF funds can pay the pro-rated share of the HTF-assisted units. When units are not comparable, the HTF costs will be allocated on a unit-by-unit basis, charging only actual costs to the HTF Program.

Comparability of Unit Size: Comparability in size is defined by the bedroom count and square footage of individual units. Not all units with the same number of bedrooms are comparable in size. If there is a substantial difference in the square footage of two units with the same number of bedrooms, the units are not considered comparable.

Comparability of Amenities: Comparability in amenities means similar fixtures, appliances and other features. In many mixed-income Projects, to demand varying rents, the quality and types of amenities may vary among units.

HTF-assisted units should be evenly distributed throughout the Project. There should be an equal percentage of HTF units for each bedroom size in the Project. For example: A 30-unit Project contains 12 two-bedroom units and 18 three-bedroom units. Five of the units are to be HTF-assisted. To assure equal distribution, then 2 of the two-bedroom units (or 16 percent) and 3 of the three bedroom units (or 16 percent) should be HTF assisted.

To the extent possible, there should be HTF-assisted units in each building of the Project. For Projects where the number of HTF-assisted units proposed would be less than the number of buildings, OHCS may provide an exception.

Fixed or Floating Units

HTF recipients may, on a Project by Project basis, choose to use either a “fixed” or “floating” designation for HTF-assisted units. A “fixed” designation means the applicant identifies at the onset which specific units are HTF-assisted, and these remain the same units for the entire period of affordability. “Floating” HTF-assisted units may change over time as long as the total number of HTF-assisted units remains constant. In “floating” HTF-assisted units the HTF-units must remain comparable in terms of size, features, and number of bedrooms.

Environmental Assessment

Application Requirement: Complete the current OHCS Site Review Checklist and contact OHCS as instructed in the NOFA to schedule an on-site visit. The on-site review of the Project must be completed by the OHCS representative prior to submission of the HTF application.

HUD has developed HTF Environmental Provisions under the HTF Property Standards at 24 CFR Part 93.301(f)(1) and (2). HTF Projects are subject to the similar environmental regulations that HOME-assisted projects are subject to, for example, if a project site includes a wetland, it cannot be funded by HTF.

If the Project receives a Reservation of HTF Funding, OHCS staff will contact the applicant regarding the Environmental Assessment process. There may be specific information needed or requirements pertinent to the Project. If there are environmental impacts, then mitigation measures must be completed if HTF funds are awarded. If the impacts are severe, the Project may not qualify for HTF funds.

HTF Environmental Assessments require complex documentation about endangered species, including a determination on the Project’s effect on endangered or listed fish, wildlife and plants on or near the site. **The HTF recipient will be required to obtain a Biological Assessment in order to determine the likelihood of endangered or listed species or critical habitat on or near the Project site.** The Project design may be reviewed by U.S. Fish and Wildlife Services (USFWS) and the National Oceanic and Atmospheric Administration (NOAA) biologists and their recommendations may become conditions of the HTF funding.

NOAA’s focus is storm water management. If endangered or listed fish are within a certain distance of the site, NOAA may require that the Project include a system on-site (bio swale or dry well) to capture and process runoff water from the roof, parking lot, or any other impervious surfaces of the development. For a new construction Project, NOAA will not approve connection of storm water drains to a municipal storm drain system under any circumstances. If the Project consists of minor or moderate rehabilitation within the current footprint of the existing building(s), a new storm water system may not be required.

Completion of the Environmental Assessment and receipt of Environmental Clearance are required prior to award of HTF funding.

Department of State Lands (DSL) Wetlands Policy and Review

DSL will review all applications awarded funding for the possibility of regulated wetlands on the site. OHCS will submit documents to DSL. If DSL determines wetlands are present or likely to be present, applicants must get a qualified wetland consultant’s wetland verification and boundary delineation for submission, review and approval by DSL. DSL may impose additional site or design requirements for the Project. Applicants must provide tax lot numbers for the OHCS submission to DSL. OHCS has provided a space on the Site Review Checklist for this information. Include the tax lot number for every parcel of land in the Project. A failure to provide the tax lot number(s) will delay the DSL review process.

Acquisition Requirements

Acquisition of property in an HTF funded Project is subject to the Uniform Relocation Assistance and Real Property Acquisition Act (URA). Due to the fact that involuntary acquisition can cause indefinite Project delays and potentially increase Project costs, **OHCS requires HTF recipients to use voluntary property acquisition.** OHCS will not use its power of eminent domain to acquire properties under the HTF Program, and requires local governments and housing authorities sponsoring HTF Projects to acquire property using voluntary acquisition procedures.

Application Requirement: Site control documentation. Submit a copy, signed by the seller, of the Notice of Disclosure to Seller with Purchase Offer or Notice of Disclosure to Seller after executing the Purchase Offer. This applies to every site in a scattered site Project.

Requirements Subsequent to Application:

- 1) Signed Notice of Disclosure to Seller of Market Value, based on
- 2) Established As-Is Market Value of the property by an appraisal completed by a licensed appraiser and in accordance with Oregon Statutes and OHCS Policy. The HTF Program requires the purchase price be the same as, or less than, the as-is market value established by the appraisal.

Under URA, HTF recipients are required to inform the seller of the property of the following:

- The power of eminent domain will not be utilized, therefore the buyer will not acquire the property if negotiations fail to reach an amicable agreement; and
- The buyer must inform the seller in writing of the property's as-is fair market value as determined by an appraisal; and
- The seller has the opportunity to withdraw from the transaction at the time of notification of the fair market value.
- Provide the above information to the seller at the time that an option or purchase agreement is presented. If a current option or sales agreement is in existence, also provide the notice to the seller. The seller has the opportunity to withdraw from the current agreement after this notification. Submit copies of all signed seller notifications to OHCS.

HUD *Handbook 1378, Tenant Relocation and Real Property Acquisition*, will provide additional information plus sample forms. OHCS provides sample forms as part of the NOFA Application package.

Choice-Limiting Actions: Once the OHCS NOFA application for HTF funding is submitted, do not undertake any action or activity that could limit the Project to a specific site. Choice-limiting actions include, but are not limited to, acquisition, demolition, or construction. Doing so will result in the Project becoming ineligible for HTF funding, regardless of what funding source is used to pay for the activity(s). Develop the Project schedule to allow time for the Environmental Assessment process to be completed prior to making any physical change to the site, including acquisition. The acceptable term of the sales agreement or option must be valid for at least one year from the date of application for HTF funds.

In accordance with 24 CFR Part 58 (HUD environmental review regulations), acquisition of land or land & buildings, as well as construction activities or the letting of contracts, are choice-limiting actions. HUD prohibits choice-limiting actions prior to the receipt of "environmental clearance". Environmental clearance includes completion of the Environmental Assessment, the subsequent publication of findings, the request for release of funds, and the issuance of an Authority to Use Grant Funds by HUD. The following scenarios apply to all Projects receiving reservations of HTF funds from OHCS.

Purchase of Property after Environmental Clearance: This is the preferred method of acquisition.

- At time of application for HTF funds, applicant has a written option or earnest money agreement with the seller.
- The applicant must demonstrate that the purchase of the property is a voluntary transaction by providing notices of disclosure to be signed by the seller. Provide an appraisal of fair market value to the seller. The buyer

must purchase the property at the lesser of the market value or the agreed upon sales price. The entire Project is ineligible to receive HTF funds if these disclosure notices are not properly executed.

- No choice-limiting actions (acquisition, demolition, construction, awarding of contracts) can take place until Environmental Clearance has been received.
- The property can be purchased with HTF funds or non-HTF funds after receipt of Environmental Clearance.

Funding Accountability and Transparency

The HTF grant shall be considered a federal award for purposes of the Federal Funding Accountability and Transparency Act of 2006 (31 U.S.C. 6101 note).

Applicability of Uniform Administrative Requirements

The uniform administrative requirements in 2 CFR Part 200 apply to all projects funded with HTF.

Audit

Audits of the HTF Recipient must be conducted in accordance with 2 CFR Part 200. The use of HTF grant funds by the Recipient must be audited not less than annually to ensure compliance with this subpart

Conflict of Interest

In accordance with 24 CFR Part 92.356, no member, officer, or employee of the Grantee, or its designees or agents, no member of the governing body of the locality in which the program is situated, and no public official of such locality or localities who exercises any functions or responsibilities with respect to the program during his tenure or for one year thereafter, shall have any interest, direct or indirect, in any contract or subcontract, or the proceeds thereof, for work to be performed in connection with the program assisted under the Agreement. The Grantee shall incorporate, or cause to be incorporated, in all such contracts, a provision prohibiting such interest pursuant to the purposes of this section.

No person who is an employee, agent, consultant, officer, or elected or appointed officer of the HTF loan recipient, who have exercised or currently exercise any functions or responsibilities with respect to activities assisted with HTF funds may obtain financial interest or benefit from a HTF assisted Project. This includes themselves or those with whom they have family ties or business ties during their tenure and for one year thereafter.

No owner, developer, or Grantee of a Project assisted with HTF funds (or officer, employee, agent, or consultant of the owner, developer, or Grantee whether private, for profit or non-profit, including Community Development Organizations, when acting as an owner, developer, or Grantee) may occupy a HTF-assisted affordable housing unit in the Project. This provision does not apply to an employee or agent of the owner or developer of a rental housing Project who occupies a HTF-assisted unit as the Project manager or maintenance worker, if the employee or agent is otherwise qualified.

HTF Award and Legal Documents

OHCS will provide executed HTF Grant Documents when the recipient meets all of the conditions provided in the NOFA Reservation Letter, some of which are as follows:

Environmental Clearance

One of the conditions of reservation of HTF funding is Environmental Clearance, received at completion of an environmental assessment. Until receipt of Environmental Clearance from HUD, the recipient must not engage in any "choice limiting" actions on the Project site. In other words, an HTF recipient cannot undertake any action or activity that could limit the Project to the specific site or perform any physical development activities on the site until a release

of funds is obtained from HUD. This includes, but is not limited to, property acquisition, demolition, or construction work. It does not matter whether HTF funds or another source of funding or the recipients' own resources pays for these activities. No choice-limiting activities can occur until Environmental Clearance is received. Doing so will jeopardize the HTF award.

Firm Commitment of All Funding

OHCS will execute the HTF loan documents only after all other proposed funding is fully committed to the Project. Once the recipient has submitted evidence of firm and final commitments from all other funding sources and has met all reservation conditions, they should allow four weeks to execute and record the HTF documents and begin drawing down HTF funds. Subsequent to recordation of the OHCS HTF loan documents, the HTF recipient may incur costs and request reimbursement from OHCS.

Construction Start Deadline

HTF recipients will have 240 days from the date of the NOFA Reservation Letter to reach construction closing, which requires all conditions of award to be satisfied. OHCS may grant extensions to the 240 day deadline on a case-by-case basis, dependent on the progress the HTF recipient has taken to meet the conditions of award.

Pre-development Costs Incurred

HTF funds can be used for eligible HTF costs incurred after the grant documents have been fully executed (i.e., signed by both the HTF recipient and OHCS) and filed with the appropriate County Recorder's Office.

Bid Solicitation and Contracting

The HTF Program does not require formal competitive bids, but does require evidence that bids be cost reasonable. Cost analysis must be made and documented in the Project's procurement file. To assure cost reasonableness OHCS highly encourages HTF recipients to get multiple bids for each contract (i.e. at least three bids). HTF recipients must document contractor selection and bid process and provide copies of this process to OHCS upon request.

HUD Requirements for the Selection of Contractor: Once the recipient has selected the general contractor for the Project, the recipient must verify that the general contractor and all subcontractors are eligible (not debarred) to participate in Federal programs. The U.S. General Services Administration maintains a list of debarred contractors (Excluded Parties List System) at: <http://www.sam.gov>. Submit a copy of the search result performed on the general contractor and all sub-contractors prior to signing the actual construction contract. Do not contract with a contractor who is ineligible under the provisions of any applicable regulations of the US Department of Labor.

Minority Owned Business / Women Owned Business: Additionally HTF recipients must do outreach to encourage participation by minority and women owned business enterprises. When advertising for bids, HTF recipients must include a statement that says "minority and women owned businesses are encouraged to apply."

Find a list of all registered minority and woman owned businesses through Business Oregon's Directory of Certified Firms, available at

<https://oregon4biz.diversitysoftware.com/FrontEnd/VendorSearchPublic.asp?XID=6787&TN=oregon4biz>. Each recipient should offer these contractors an opportunity to submit a bid. The HTF recipient is required to document and submit evidence of outreach efforts regarding MBE/WBE at completion of the Project.

Section 3: The purpose of Section 3 of the Housing and Urban Development Act of 1968 is to ensure to the greatest extent possible that employment and other economic opportunities generated by HUD financial assistance shall be directed to low and very low income persons, particularly the recipients of government housing assistance, and to business concerns that provide economic opportunities to low and very low income persons.

Contracts and subcontracts funded in whole or in part by HUD resources are subject to Section 3 requirements when the individual contract or subcontract exceeds \$100,000 and the amount of HUD assistance for the Project exceeds

\$200,000. Both conditions must be present. Contracts exclusively for supplies or materials are excluded unless the contract includes installation of the materials.

Section 3 requirements apply to housing rehabilitation (including reduction and abatement of lead-based affected: paint hazards, but excludes routine maintenance, repair and replacement), and to housing construction (including reconstruction, conversion), and other public construction assisted with housing or community development assistance.

Goals include a commitment to award the following to Section 3 businesses:

- 10 percent of the total dollar amount in contracts for building trades work arising in connection with housing rehab, housing construction;
- 3 percent of the total dollar amount of all other Section 3-covered contracts;
- Notify Section 3 businesses of the contracting opportunities covered by these requirements;
- Notify all potential contractors of the Section 3-covered contracting requirements, and include the required Section 3 clause in contracts;
- Assist and “actively” cooperate with HUD in obtaining contractor/subcontractor compliance with Section 3 requirements;
- Refuse to award contract to any contractor who has been found to have violated the Section 3 regulations;
- Take appropriate remedial action against contractors who fail to comply with the Section 3 requirements (e.g. termination); and
- Document actions (including results and impediments) taken to comply with Section 3 requirements.

Section 3 Registry HUD maintains a database of firms that have self-certified that they meet the definition of a Section 3 Business. To search the database for Section 3 businesses please visit: www.hud.gov/Sec3Biz

Section 3 Reporting Requirements HTF recipients are required to obtain from the General Contractor a completed HUD Form 60002. HTF funding in the amount of 10% of the total award will be held until Project completion and the Section 3 Report (HUD-60002) is submitted to OHCS.

Subsidy Layering

Before committing funds to a project, OHCS must evaluate the project in accordance with applicable guidelines and not invest any more HTF funds, alone or in combination with other governmental assistance (including any operating cost assistance or project-based rental assistance), than necessary to provide quality affordable housing that is financially viable for, at a minimum, the affordability period required by regulation. The grantee must also examine the sources and uses of funds for the project and determine that these costs are reasonable and will not provide undue return on the owner’s or developer’s investment or undue profit. The Subsidy Layering Review can result in a reduction of HTF assistance, reduction in rents, or adjustment in operating expenses.

No Match Requirement

Non-federal match is not a requirement of the HTF program. HTF funds can be leveraged with other federal and state funds, providing an additional source of funding for multifamily rental housing projects.

OHCS Underwriting Guidelines

Program Limits: OHCS has established the following program limits for evaluating Projects. Applicants for HTF funding must demonstrate compliance with all the Program Limits. In determining the amount of HTF funding to allocate to a Project, OHCS may reduce the budget and funding amounts to reflect the Program Limits listed below. If the Applicant varies from the following Program Limits, mitigating factors must be provided by the Applicant, which will be subject to OHCS consideration in its sole discretion.

Maximum Construction Contingencies: The maximum amount of HTF reserved or allocated to a Project will be determined after limiting the rehabilitation contingency to ten percent (10%) of the rehabilitation costs and the new construction contingency to five percent (5%) of the new construction costs. Rehabilitation costs include rehabilitation hard costs, site work costs, general conditions, and contractor profit and overhead. New construction costs include new construction hard costs, site work costs, general conditions, and contractor profit and overhead.

Maximum Developer Fees: OHCS will consider Developer Fees, as specified in the table below; calculated as the Developer Fee plus Consultant Fees divided by the Total Project cost minus Acquisition, Developer Fee, Consultant Fees and Capitalized Reserves.

Developer Fee PLUS Consultant Fee
Total Project Cost **MINUS** Acquisition, Developer Fee, Consultant Fee, Capitalized Reserves

Project Size	New Construction	Acquisition/ Rehab
<31 Units	18%	20% + \$4,000/unit OR + \$5,500/unit for Preservation
31-75 Units	16%	18% + \$4,000/unit OR + \$5,500/unit for Preservation
76-100 Units	14%	16% + \$4,000/unit OR + \$5,500/unit for Preservation
100+ Units	12%	14% + \$4,000/unit OR + \$5,500/unit for Preservation

For this purpose, Developer Fees shall be deemed to include all consultant fees (other than arm’s length architectural, engineering, appraisal, market study and syndication costs, URA administration), and all other fees paid in connection with the Project for services that would ordinarily be performed by a developer, as determined by OHCS.

The Developer Fee will be set at the time of the construction/equity closing based on the Project’s final budget after construction bids have been accepted and final sources and uses have been balanced, but will not exceed the amount in the application without approval which will be at the sole discretion of OHCS and will not be unreasonably withheld for justifiable increases in the scope of work, as long as the developer fee does not exceed OHCS’s approved maximum developer fee. The fee presented at Project completion may not exceed the amount finalized at construction closing.

OHCS may approve release of up to 50% of the total developer fee when the Project has reached 50% completion of construction. This must be evidenced by an AIA statement signed by the Project architect that verifies the percent of construction completed. OHCS will approve release of the balance of the developer fee subsequent to issuance of a Certificate of Occupancy.

OHCS may elect to release a partial development fee in accordance with an executed Development Agreement. The Agreement must detail a disbursement schedule tied to the completion of specific development mileposts. Mileposts can include the completion of pre-development activities, loans, and equity commitments, construction, stabilized occupancy and permanent loan closings.

Operating Expenses: Operating expenses will be reviewed for reasonableness within the budgets submitted; Applicant may be required to submit documentation (including for example three years of audited financials for rehabilitation Projects) to substantiate that any or all of the Projects revenue or costs are reasonable. OHCS will review against its portfolio and take into consideration input from lenders and investors.

Financial Feasibility

Sources and Uses Statement: The Applicant must submit the Sources and Uses statement with its Application or as otherwise required by OHCS. The Sources and Uses statement must describe all of the funds or Sources to be used to pay for all Project costs and the intended Uses of such funds. The statement must identify each separate source and use and the estimated timing of final approval for each. The Sources and Uses must balance fully and no Source may be unknown. If any sources or uses are identified as unknown at the time of review, the Applicant’s application may be deemed incomplete and removed from further processing.

Operating Pro Forma: The Applicant must submit with its Application an operating pro forma for the Project satisfactory to OHCS demonstrating financial feasibility and viability of the Project for a typical twenty (20) year permanent loan period. In addition, the Applicant must demonstrate that the Project will continue to be financially feasible and have adequate replacement reserves for the entire period of affordability.

Acquisition cost must be supported by an appraisal	No exception Program regulation requires acquisition cost to be the same or less than the as-is market value established by an appraisal
Construction Inflation Factor/Cost Escalator (applies to separate line item above and beyond construction bid)	3 % of total construction cost
Contractor Profit, General Conditions and Overhead – non Identity of Interest (does not include insurance)	14% of total construction cost or less
Contractor Profit, General Conditions and Overhead – Identity of Interest (does not include insurance)	10% of total construction cost or less
Soft Costs	30% of Total Project Cost or less
Operating Reserve	Generally six (6) month of operating expenses or lender / investor conditions
Lease Up Reserve	Submit cash flow analysis utilized to determine the amount
Reserve for Replacement (Capitalized)	Submit evidence of the partner lenders and/or investors to document their requirement. Minimum guideline of \$350 per unit per year, or \$300 for Senior Projects

Absent a long-term commitment (in excess of ten (10) years), Projects with rental assistance must demonstrate financial feasibility excluding the rent subsidy.

If the Project includes commercial and/or other non-residential space, the Applicant must submit the following information and supporting documentation in addition to the residential pro forma requested above:

- a. A breakdown of the total residential and commercial Project costs,
- b. A list of the financing sources for the commercial areas,
- c. Ownership entity and management agent of the commercial areas; and
- d. A twenty (20) year operating pro forma for both the residential and commercial areas.
- e. Such other information as OHCS may require.

The pro forma must contain the following data:

- a. Growth assumptions that are typically estimated at two percent (2%) per year for income and three percent (3%) per year for expenses.
- b. Estimates of income and expenses that are well documented by actual historical amounts, comparable income or expense studies, Applicant market assessment, a market study or an appraisal.
- c. Such other information as OHCS may require.

The pro forma also must address the following industry benchmarks:

- a. A vacancy rate of not less than seven percent (7%), if a different rate is used, explanation must be provided in the Financial Description section of the application.
- b. An expense ratio and expenses per units properly scaled to the size and scope of the improvements, the cost of local utilities and taxes and the makeup of tenant population served.
- c. Replacement reserves properly scaled to the size and scope of the improvements and the age and condition of the property. Minimum guideline of \$350 per unit per year, \$300 for Senior Projects; amounts in excess will be allowed if reasonably justified by Capital Needs Assessment and / or lenders conditions. The CNA is described in the Architectural Appendix.
- d. Operating Reserves are generally six (6) months of operating expenses or lender / investor conditions.

While using some benchmarks and industry best practices to evaluate the information, each pro forma will be separately assessed based on its reasonable and well-documented Projection of income and expenses to determine if it effectively demonstrates the Project's financial feasibility and viability.

Minimum Debt Coverage Ratio: The minimum Debt Coverage Ratio (DCR) will be 1.15:1 for all hard amortizing debt through the initial 20-year pro forma period. Projects with debt coverage ratio that exceed 1.30:1 may be eligible for less HTF funding. Projects are underwritten on an individual basis in concert with the lenders to determine an appropriate DCR and perform subsidy layering.

Debt Underwriting: Many Projects require hard amortizing debt as one of the sources of funds. If there is hard amortizing debt, the proposed debt service coverage, and breakeven ratios must be in conformance with OHCS limits and industry norms noted previously. If there is no mortgage debt, then the pro forma must demonstrate a stable positive cash flow over 20 years.

Appraisal / Market Analysis Requirements

Group Home Market Assessment: Generally, a project is considered a group home if it provides permanent housing for non-related residents with special needs where tenants occupy a bedroom in a house with shared kitchen, living areas and bathrooms.

The NOFA Reservation Letter will include a condition that HTF Recipients to provide sufficient information to confirm the community needs the home and there will be an adequate population in the foreseeable future to support the project

through the period of affordability. Recipients must provide specific data and sources of information.

Special Needs Market Assessment: The Special Needs Market Assessment must address specific special needs populations including, but not limited to:

- persons with the presence of a disability
- victims of domestic violence
- previously incarcerated persons
- homeless individuals and families
- persons in recovery

The NOFA Reservation Letter will include a condition that HTF Recipients to provide sufficient information to confirm the community needs the housing and there will be an adequate population in the foreseeable future to support the project through the period of affordability. Recipients must provide specific data and sources of information, which includes reasonable, credible, and verifiable market support for the proposed project. Marginal (unmet or surplus) demand and appropriate rents should be estimated for the specific target population.

General Housing Market Assessment:

The General Housing Market Assessment applies to non-LIHTC Projects targeting general family, individuals, elderly/seniors, and farm workers.

The NOFA Reservation Letter will include a condition that HTF Recipients to provide sufficient information to confirm the community needs the housing and there will be an adequate population in the foreseeable future to support the project through the period of affordability. Recipients must provide specific data and sources of information, which includes reasonable, credible, and verifiable market support for the proposed project. Marginal (unmet or surplus) demand and appropriate rents should be estimated for the specific target population.

Research and analysis of the market includes information from market participants such as onsite managers, management companies, and brokers. Additionally, real estate reports from secondary data providers, U.S. Census data, Portland State University (PSU) population data, and demographic vendors provide added data as well.

HTF and LIHTC Funded Projects: A complete market analysis following OHCS Market Analysis Guidelines must be submitted for approval within 90 days following the date of the NOFA Reservation Letter for HTF and LIHTC funding. Accommodation of this requirement may be provided if the construction or permanent lender orders a FIRREA compliant appraisal naming OHCS as an intended user and includes a market analysis prepared in accordance with OHCS Guidelines.

The market analysis must satisfy the requirements of this section, and in an LIHTC funded Project, Section 42 of the Code. An independent third party analyst, using generally accepted principles and theory, must prepare the market analysis. The analyst must be included on the OHCS list of approved providers. The analyst must have demonstrated experience in the proposed Project's market area and with the rent-restricted market. The rental analysis section included in the market analysis report must be completed by a State Certified General Appraiser.

OHCS will accept a recent FIRREA appraisal with an effective date of no more than six (6) months prior to the date of the Reservation Letter in lieu of the required market analysis, provided the market analysis and rent discussion sections include the information detailed in the OHCS Market Analysis Guidelines.

Market Analysis / Appraisal Guidelines: FIRREA standards require that appraisals must be ordered by the lender or other insured financial institution - which must define the purpose of the appraisal and provide guidance to the appraiser as to the bank or financial institution requirements - and the bank or financial institution must engage the appraiser, who cannot be related in any way to the seller or buyer.

- For Projects that currently have restricted rents, the appraisal must include an "As is" Restricted Rent Value.

- For Projects that currently receive or will receive at time of sale “Project based” subsidy, the appraisal must include an “as is” restricted rent value taking into consideration the subsidy that is generally marked to market. ***In most cases, this is the value that must be used to set the price of acquisition.***
- For Projects that do not currently have restricted rents, the appraisal must include an “as is” Market Rent Value.
- In all appraisals an “as is” Market Value for land must be included that reflects all restrictions on the land.
- OHCS must be named as an intended user and permission granted to OHCS to discuss the report with its preparer.

The market analysis must demonstrate to OHCS the Project is creating, preserving, or renovating housing that current market forces are not addressing. In addition, the market analysis must address current market conditions and determine the Project is viable and provides units at below-market rents or provides some other public benefit.

At OHCS’s discretion OHCS may require further market support of the Project, or accept a market analysis in a different format. Any deviation from the market analysis Guidelines must be approved in writing by OHCS prior to submission of the report. OHCS reserves the right to contact the market analyst as needed.

OHCS Approved Market Analysts: The list of approved providers may be found on the OHCS website at: <http://www.oregon.gov/ohcs/HD/HRS/LIHTC/ApprovedMarketAnalystsList.pdf>

Market Analysis Components: All market analyses should include the following summarized sections as well as the more detailed Market Analysis Guidelines:

- Report Title Page
- Letter of Transmittal
- Table of Contents
- Executive Summary
- Photographs of Project
- Assumptions and Limiting Conditions
- Scope of the Assignment
- Regional Analysis
- Primary Market Area (PMA) Analysis
- Site Description & Analysis
- Improvement Description & Analysis
- Target Market Identification
- Demand Analysis
- Supply Analysis
- Reconciled Estimate of Marginal Demand
- Capture Rate Development
- Conventional Market-rate Rents
- Affordable (low income) Market Rents
- Certification
- Addendum

Non-discrimination and Accessibility Standards

Three different sets of nondiscrimination requirements apply to the HTF Program: Section 504 of the Federal Rehabilitation Act of 1973; the Fair Housing Act of 1988; and the Americans with Disabilities Act (ADA). Both new construction and substantial rehabilitation of multi-family housing assisted with HTF funds are subject to and must meet the standards of Section 504. Section 504 standards apply to all units in a Project and not just the HTF-assisted units.

Substantial Rehabilitation Project: defined as a Project with 15 or more units where the rehabilitation cost will equal at least 75 percent of the replacement cost of newly constructed multi-family units. Applicants of such rehabilitation Projects must meet the following Section 504 criteria:

- Five percent of the units in the Project (not just HTF-assisted units) must be accessible to individuals with mobility impairments, and an additional two percent must be accessible to individuals with sight and hearing impairments.
- Distribute the accessible units evenly throughout the Project buildings
- Distribute the accessible units evenly by bedroom size throughout the Project.
- When designing a larger bedroom accessible unit, as in a townhouse with inaccessible living areas on the second floor, Section 504 recommends the unit be a single floor design.
- When designing an accessible bathroom, consider a roll-in shower in lieu of a shower/tub not easily accessed by some physically disabled persons.

When smaller Projects are rehabilitated or when rehabilitation costs are less than 75 percent of the replacement cost then: every alteration to a unit must make the unit accessible to the maximum extent feasible until 5 percent of the units in the Project are fully accessible to people with mobility impairments. Alterations to common spaces must always make the Project accessible to the maximum extent feasible. Consult the Fair Housing Amendments for guidelines about rehabilitation of one to four unit rental properties.

Section 504 accessibility standards are further described in the Uniform Federal Accessibility Standards. HTF applicants should provide this information to their architects early in the process to insure the Project meets the accessibility criteria as defined in Section 504. Section 504 requires that new construction Projects have 5 percent of the units in the Project be accessible to individuals with mobility impairments and an additional 2 percent of the units be accessible to individuals with hearing or visual impairments. Section 504 also requires accessible units to be distributed throughout the Project and must be available in a sufficient range of sizes and amenities so as not to limit choices.

New construction of multi-family housing Projects is also subject to the accessibility requirements in the Fair Housing Act of 1988. The Americans with Disabilities Act (ADA) has a broader application than the Fair Housing Act or Section 504, in that it addresses employment practices, public services, transportation, and public accommodations. Although the ADA does not specifically address residential housing, since housing is covered by Section 504 and the Fair Housing Act of 1988, HTF recipients should be aware of the ADA's scope and requirements. HTF recipients will need to have the Project architect verify that the plans/specifications meet the Section 504, ADA and Fair Housing standards. Architects must verify at the completion of the Project that the constructed/rehabilitated units have met these standards.

HTF Property Standards

HTF assisted housing is required to meet OHCS design and construction standards as well as Rehabilitation Standards as defined in the **OHCS Project Development Manual**, which can be accessed on the OHCS website.

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 by the federal government. The regulation addresses the requirements for notification, evaluation and reduction of lead-based paint hazards in federally assisted 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. Every unit in the project must comply with these regulations, not just the designated HTF-assisted units. Lead-based Paint regulations appear within Title 24 of the Code of Federal Regulations (24 CFR 35).

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.

Federal Labor Standards: Davis Bacon and other Federal Labor Standards are not applicable to the HTF Program.

Housing Development and Preservation Standards

OHCS has established a set of design and construction standards to aid in the process of developing quality affordable housing in keeping with the Department's mission and vision.

Architectural design and construction standards, rehabilitation assessment criteria, green building requirements, and architectural submission requirements are discussed in detail in the **OHCS Project Development Manual**. The Project Development Manual defines OHCS requirements and expectations related to the planning, design, rehabilitation and construction of housing and housing related improvements undertaken with funding programs administered by OHCS. The Project Development Manual is available on the OHCS website under *Multifamily Housing Funding Opportunities*.

Projects must be built to be sustainable for a significant period of time without the need of rehabilitation work. This requires careful design, material selection and oversight by Project architects, contractors, developers, and owners. This type of planning and oversight must ensure the Project, including building envelopes and all structural components, has the necessary sustainability to last for a significant period of time with only industry-standard scheduled maintenance.

Construction Guidelines

OHCS supports the development of affordable housing that is safe, sanitary, habitable, well designed, contributes positively to the quality of life in Oregon, adds to the aesthetics and living environment of the community, and enhances the self-esteem and empowerment of the residents it houses and serves. Accordingly, Projects must be built using sustainable and green building practices, and they must comply with the Visitability laws of Oregon.

Confirmation of Status of Review by Local Planning and Code Jurisdictions

The sponsor must provide evidence in the architectural documents that the Project has been properly and sufficiently vetted with any and all local planning and code jurisdictions for Project feasibility. This includes all local planning and building departments as well as any other state agencies; e.g., Department of Transportation, Department of Environmental Quality.

Demolition and Hazardous Materials

Project must meet local and state requirements for handling and the removal of demolition and hazardous materials.

Identification of Easements and Encroachments and Adjacent Land Uses

The preliminary site design and development plan must identify all known, recorded or observed easements and encroachments, property boundaries, and identify all adjacent land uses.

Rehabilitation Requirements

OHCS requires a thorough Capital Needs Assessment (CNA) will help determine the appropriate rehabilitation scope of work and the estimate of probable rehabilitation cost.

Project Sign Requirements

HTF projects with construction costs in excess of \$50,000 must have a project sign located prominently at the site. The sign must include the contribution of HTF funds under HUD in lettering no smaller than that used to acknowledge other contributors to the project. Use "HUD" rather than "HTF" when listing the project's contributors. The sign is to be installed prior to construction and is to be maintained for the duration of the construction contract. Photos may be submitted as prints, color photocopies or digital images.

Construction Oversight and Inspections

OHCS has implemented a comprehensive plan for construction and rehabilitation oversight of HTF funded Projects, which is described in the **OHCS Project Development Manual**.

OHCS will review and approve all construction-related documents prior to construction and will monitor construction progress until Project completion. OHCS will review and approve work write-ups (i.e., plans and specifications) and written cost estimates. Based on this review, OHCS will determine that the work write-up and/or plans are in compliance with OHCS design and construction standards as described in the OHCS Project Development Manual.

OHCS will ensure the construction contract(s) and construction documents describe the work to be undertaken in adequate detail so that inspections can be conducted. The written scope of work to be performed must be in sufficient detail to establish the basis for a uniform inspection of the housing to determine compliance with OHCS design and construction standards as described in the Project Development Manual. OHCS will review and approve written cost estimates for construction and/or rehabilitation, as well as change orders, in order to determine that costs are reasonable.

OHCS will conduct an initial property inspection and regular progress inspections during construction and/or rehabilitation in order to ensure work is completed within established standards. Progress payments must be consistent with the amount of work performed. A final inspection will determine if work was done in accordance with the Project's approved work write-up or plans, and final payment will not occur until construction is satisfactorily completed in

accordance with the applicable codes, the construction contract, and construction documents. OHCS may utilize qualified in-house staff or secure a qualified third-party inspector to perform inspections.

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 by the federal government or that is sold by the government. The regulation addresses the requirements for notification, evaluation and reduction of lead-based paint hazards in federally assisted properties. The regulation appears within title 24 of the Code of Federal Regulations (24 CFR 35). Find more information on the regulation and other educational materials here:

https://www.hud.gov/program_offices/healthy_homes/enforcement/lshr

Regulations and Affected Properties: The lead-based paint regulations affect acquisition and rehabilitation of housing Projects constructed prior to 1978. All pre-1078 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. All HTF-funded projects must complete the [Lead Rule Compliance Advisor](#) form detailing compliance requirements of the specific project.

Rehabilitating Properties Containing Asbestos

Most housing and buildings constructed before 1979 contain some form of asbestos. Undertaking rehabilitation actions where asbestos is present is subject to numerous and increasing regulation at all levels of government. Careless or illegal handling of asbestos-containing materials can subject rehab contractors, workers, and building occupants to health hazards, and can place the contractor, manager and owners in a position of serious civil and possibly criminal liability. If the property was built prior to 1979, submit a written plan to mitigate, abate, and dispose of asbestos. All HTF-funded properties built prior to January 1, 2004 must have an asbestos survey completed prior to project closing in accordance with Oregon Department of Environmental Quality requirements for asbestos surveys:

<https://www.oregon.gov/deq/FilterDocs/asb-SurveyFS.pdf>

Affirmative Marketing

Affirmative marketing is required for HTF Projects containing five or more units. Affirmative marketing consists of actions to provide information and otherwise attract eligible persons to the available housing from all racial, ethnic, and gender groups in the housing market area. Affirmative Marketing differs from general marketing activities because it specifically targets potential tenants who are least likely to apply for the housing, in order to make them aware of available affordable housing opportunities. OHCS will annually assess a Project's affirmative marketing program to determine the success of affirmative marketing efforts and any necessary corrective actions.

HTF-assisted Projects (five or more units) serving special needs populations must meet all HTF Program requirements regarding affirmatively marketing the units. The units must be marketed to all persons within the special needs group. The units may not be filled exclusively through referrals from a single social service agency. A good faith effort must be made to inform and solicit applications from members of the special needs group throughout the market area.

HTF-assisted Projects designated for persons with disabilities cannot be restricted to persons with specific types of diagnoses or subclasses of disabilities (such as developmentally disabled, chronically mentally ill, or persons with only physical disabilities). Resident services may be specific to subclasses of disabilities, but the housing may not. HTF-assisted housing for disabled persons must be open to persons with any type of disability.

Affirmative marketing activities, at a minimum, shall include:

- Develop and submit [HUD Form 935.2 Affirmative Fair Housing Marketing Plan](#).
- Insuring advertised vacant units include the Equal Housing Opportunity logo or statement.
- Posting the HUD Fair Housing poster in common area(s) of housing assisted with HTF funds.

- Soliciting applications for vacant units from persons in the housing market who are least likely to apply for the HTF-assisted housing without the benefit of special outreach efforts.
- Maintaining file records containing all marketing efforts (e.g., newspaper advertisements, file memorandums documenting phone inquiries, copies of inquiry letters and related responses, etc.) These records shall be made available to OHCS staff for inspection during normal working hours.
- Maintaining listings of all tenants residing in each unit at the time of application submittal through the end of the HTF compliance period.

OHCS will annually assess a Project's affirmative marketing program to determine the success of affirmative marketing activities and identify any needed corrective actions.

Fair Housing

HTF recipients are responsible for complying with Fair Housing Laws. Title VIII of the Civil Rights Act of 1968 (Fair Housing Act), as amended, prohibits discrimination as follows:

In the Sale and Rental of Housing: No one may take any of the following actions based on race, color, national origin, religion, sex, familial status or handicap:

- Refuse to rent or sell housing
- Refuse to negotiate for housing
- Make housing unavailable
- Deny a dwelling
- Set different terms, conditions or privileges for sale or rental of a dwelling
- Provide different housing services or facilities
- Falsely deny that housing is available for inspection, sale, or rental
- For profit, persuade owners to sell or rent (blockbusting) or
- Deny anyone access to or membership in a facility or service (such as a multiple listing service) related to the sale or rental of housing.

In Addition: It is illegal for anyone to:

- Threaten, coerce, intimidate or interfere with anyone exercising a fair housing right or assisting others who exercise that right.
- Advertise or make any statement that indicates a limitation or preference based on race, color, national origin, religion, sex, familial status, or handicap. This prohibition against discriminatory advertising applies to single-family and owner-occupied housing that is otherwise exempt from the Fair Housing Act.

There is additional protection for persons with disabilities. Tenants with physical or mental disabilities, including hearing, mobility and visual impairments, chronic alcoholism, chronic mental illness, AIDS, AIDS Related Complex and mental retardation) that substantially limits one or more major life activities are protected from landlords who Refuse to let disabled tenants make reasonable modifications to their dwelling or common use areas (at tenant's expense), if necessary for the disabled person to use the housing or Refuse to make reasonable accommodations in rules, policies, practices or services if necessary for the disabled person to use the housing.

HTF assisted Projects are subject to HUD regulations intended to ensure equal access of LGBT persons, which includes the following:

- A general equal access provision which requires housing to be made available without regard to actual or perceived sexual orientation, gender identity, or marital status;
- Clarification that the terms "family" and "household" as used in HUD programs, include persons regardless of actual or perceived sexual orientation, gender identity or marital status;

- Prohibition on owners and operators from asking about an applicants or occupants sexual orientation or gender identity for the purpose of determining eligibility or otherwise making housing available;

For additional information, search Fair Housing on the HUD.gov website.

Tenant Selection

An owner of HTF-assisted rental housing must comply with the affirmative marketing requirements established by the grantee pursuant to 24 CFR Part 92.760, and follow written tenant selection policies and criteria that:

- Limit the housing to income-eligible families;
- Are reasonably related to the applicant’s ability to perform the obligations of the lease;
- Limit eligibility or give preference to a particular segment of the population if permitted in its written agreement with the grantee (and only if described in the grantee’s consolidated plan), in accordance with the requirements further detailed in this section;
- Do not reject an applicant with a voucher under the Section 8: Housing Choice Voucher Program;
- Provide for the selection of tenants from a written waiting list in the chronological order of their applications, as feasible; and
- Give prompt written notification to any rejected applicant describing the grounds for any rejection.

Tenant Protections

Lease Agreement: There must be a written lease between the tenant and the owner of rental housing assisted with HTF funding. The length of a lease for an HTF-assisted unit must not be less than one year, unless otherwise modified by mutual agreement between owner and tenant.

Termination of tenancy or refusal to renew a lease may only be for serious or repeated violation of the terms and conditions of the lease; for violation of applicable federal, state, or local law; for completion of the transitional housing tenancy period; or for other good cause. Landlords must give the tenant a 30 day notice of termination or refusal to renew.

OHCS does not provide a model lease agreement. However, Owners/Agents must execute Lease Agreements with tenants that incorporate specific provisions that establish tenant responsibilities and avoid certain prohibited provisions.

In addition to the Owner/Agent required lease, OHCS requires the use of the HTF Lease Compliance Form (OHCS.22H).

Prohibited Lease Terms

- Agreement by the tenant to be sued, to admit guilt or to a judgment in favor of the owner in a lawsuit brought in connection with the lease.
- Agreement by the tenant that the owner may take, hold, or sell personal property of the household members without notice to the tenant and a court decision on the rights of the parties. This prohibition, however, does not apply to an agreement by the tenant concerning disposition of personal property remaining in the housing unit after the tenant has moved from the unit. The owner may dispose of this personal property in accordance with state law.
- Agreement by the tenant not to hold the owner or owner’s agents legally responsible for any action or failure to act, whether intentional or negligent.
- Agreement by the tenant that the owner may institute a lawsuit without notice to the tenant.
- Agreement by the tenant that the owner may evict the tenant or household members without instituting a civil court proceeding in which the tenant has the opportunity to present a defense or before a court decision on the rights of the parties.
- Agreement by the tenant to waive any right to a trial by jury.

- Agreement by the tenant to waive the right to appeal or otherwise challenge in court a court decision in connection with the lease.
- Agreement by the tenant to pay attorney fees or other legal costs, even if the tenant wins in a court proceeding by the owner against the tenant. If the case is lost, the tenant, however, may be obligated to pay costs.

Nondiscrimination Against Rental Subsidy Holders

HTF recipients cannot refuse to lease HTF-assisted units to a voucher holder under 24 CFR part 982, or to the holder of a comparable document evidencing participation in a HOME tenant-based rental assistance program.

Uniform Relocation Assistance and Real Property Acquisition (URA)

The HTF Program is subject to the Uniform Relocation Assistance and Real Property Acquisition Act (URA). URA requirements and policies must be followed when acquiring property or displacing people or businesses for a Project with federal HTF funds. 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.

Providing an incentive to encourage tenants to move from the project is NOT allowed in projects receiving OHCS HTF funding.

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.

Over- Income Tenants in a Rehabilitation Project: Tenants residing in a rehabilitation project whose income exceeds Program limits are not to be displaced. In an LIHTC funded project, the unit must be removed from basis.

To the extent feasible, the HTF 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. HTF 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 HTF applicant intends to rehabilitate an occupied property, the issue of economic displacement needs to be of particular concern. Tenants who are economically displaced qualify for relocation benefits, so HTF recipients must modify future rent increases 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?

The Relocation Plan (including an itemized budget for relocation) must be up-dated and submitted to OHCS for approval 30 days before construction closing.

3. General Information Notice: A General Information Notice (GIN) must be sent to all tenants (residential and commercial) prior to submission of an HTF 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 HTF 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 HTF 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 HTF 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 HTF Loan Documents

Update Relocation Plan and Tenant Survey: Update the tenant survey to reflect tenants who have moved; new tenants, and other new information.

Notice of Displacement/Non-Displacement: As soon as possible after the date the HTF loan document is executed, a notice must be issued to each tenant who was in occupancy on the date the HTF application was submitted. The notice must either contain a specific offer of a suitable, affordable unit in the Project, or provide a Notice of Displacement₂ if the tenant will be permanently displaced. The notice informs the tenant of their eligibility of any relocation benefits.

1. 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.
2. 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 HTF 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

In accordance with 24 CFR Part 42.375, HTF 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 HTF funding.

If a Project receives HTF 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.

Compliance Responsibilities During Period of Affordability

OHCS Approval of Changes to Rent and Utility Allowances: HUD will publish the HTF Program Rents on an annual or periodic basis. Depending upon HUD's calculations, the HTF Program Rents may increase or decrease. The HTF recipient is responsible for recalculating HTF maximum monthly rents and utility allowances on an annual basis. OHCS must review and approve all recalculations of rent and utility allowances prior to any changes being implemented. Tenants must have at least 30 days written notice of any increase. All increases are also subject to other provisions of the lease agreements.

Financial Oversight during Period of Affordability: HTF funded Projects are subject to OHCS examination of the financial condition of the Project. The purpose of this requirement is to identify financially troubled Projects before the problems become severe. OHCS will take action if financial problems are identified.

Inspection Standards during Affordability Period

Uniform Physical Condition Standards (UPCS) are national standards established by HUD for housing that is decent, safe, sanitary, and in good repair. These standards are now adopted for the HTF Program, and will be the basis for ongoing compliance monitoring of HTF funded Projects.

During the period of affordability, the HTF recipient must ensure HTF-assisted units comply with all local housing code requirements as well as the Uniform Physical Condition Standards (UPCS). OHCS will conduct on-site inspections of HTF-assisted rental housing to determine compliance with property standards and to verify compliance with other applicable HTF regulations such as tenant income certifications and rental charges. OHCS will conduct onsite inspections every three years for Projects containing one to four units; every two years from Projects containing five to twenty-five units; and every year for Projects with twenty-six or more units.

HTF Project Close-Out

Once the project is completed and receives a Certificate of Occupancy (or comparable) the HTF recipient can begin the process of "closing-out" the HTF Project. The final 10% of the HTF funding can be requested once close-out documentation is completed and submitted to OHCS.

Close-out documentation includes, but is not limited to, the following:

- updated Applicant and Project Information Form
- notarized Final Sources and Uses
- updated Operating Budget (including HTF utility allowance documentation)
- verification of compliance for any conditions resulting from the Environmental Assessment that are specific to this Project
- MBE/WBE Report
- Section 3 Report
- Tenant Income Certification (TIC) for HTF assisted units (including verifications)
- HTF Monitoring Report with the HTF units identified
- Lead Paint Notification Forms signed by every tenant (if rehab of project built in 1978 or before)
- Satisfaction of Payment or Release of Lien signed by General Contractor
- Photos of Completed Project (electronic version)
- Certificate of Occupancy
- Household Characteristics Form (HTF-assisted units only)
- As Built Certification signed by the project architect that project was built to comply with Section 504 Standards
- documentation needed to complete URA records if applicable

Revocation of a Reservation

OHCS may revoke an existing HTF award, withhold unexpended HTF funds, require repayment of expended HTF funds, and bar a recipient from applying for future HTF assistance if the recipient breaches any deed restrictions.

OHCS may revoke a HTF reservation in the following instances:

- the applicant does not meet development milestones on time;
- the application misrepresented the Project or included false information;
- after application, the purpose or scope of the Project is substantially changed; or
- the applicant changes funding sources or amounts without prior approval from OHCS.

Terminated HTF Projects

If HTF funds are expended for a Project that is terminated prior to completion, for whatever reason, the recipient must repay the HTF funds to OHCS, which will then be repaid to HUD. OHCS is required by HUD to terminate any Project that does not meet the HTF requirements for affordable housing (affordability provisions, income targeting, property standards, etc.).

APPENDIX J.

SF 424S AND CERTIFICATIONS