

# 2019 Annual Action Plan

*June 19, 2020 CARES Act Amendment  
October 1, 2020 CARES Act Second Amendment  
November 6, 2020 CARES ACT Third Amendment*

## State of Oregon

Oregon Housing & Community Services

Oregon Health Authority

Business Oregon



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# Acknowledgements

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## Leadership

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State of Oregon

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Oregon Health Authority

## **Prepared by:**

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# Executive Summary (AP-05)

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## **Introduction:**

Oregon Housing and Community Services Department (OHCS) is the lead agency responsible for facilitating the development and implementation of Oregon’s Consolidated Plan, Annual Action Plan, and Consolidated Annual Performance Evaluation Report.

The 2019 Annual Action Plan details the fourth year of implementation of the 2016-2020 Consolidated Plan; approved in May of 2016. The Consolidated Plan was later amended to include Oregon’s 2016 National Housing Trust Fund Allocation Plan. The 2019 Annual Action Plan seeks to advance the priorities set for the Consolidated Plan.

The 2019 Annual Action Plan has been amended to account for additional resources provided to the Emergency Solutions Grant (ESG-CV), the Community Development Block Grant (CDBG-CV) and to Housing Opportunities for Persons With HIV/AIDS (HOPWA). Funding has been allocated to State of Oregon agencies by HUD in compliance with the Coronavirus Aid, Relief, and Economic Security Act (CARES Act), Public Law 116-136. The CARES Act is in federal response to the declared pandemic that has been named COVID-19 and will be referred to by that name in this Action Plan. OHCS’ Substantial Amendment to the 2019 Annual Action Plan for an initial ESG-CV allocation was approved in June 2020. Because the Act released ESG-CV funds in two phases, OHCS is submitting a second Substantial Amendment for the second release of ESG-CV funds.

Homeless persons, both unsheltered and sheltered, are at high risk of contracting COVID-19 and can easily spread it to others. Persons already homeless have no way to take protective steps or self-isolate when ill. ESG-CV usage assists with social distancing shelter including hotel/motel vouchers, outreach, re-housing, connection to medical resources and services for the state’s homeless population.

Many other households have experienced an unexpected loss of income. The coronavirus pandemic caused a closure of all businesses and government offices that aren’t deemed essential. Many households have not received paychecks or have lost hours worked during this time and are experiencing a dramatic reduction in their ability to pay their regular monthly expenses. ESG-CV is providing funds for rapid re-housing and housing stability to ensure this population does not become homeless, or if already homeless, can be re-housed quickly.

Oregon’s 2019 Annual Action Plan is governed by 24 CFR 91.300, and was developed in accordance with those regulations, and the direction provided by the U.S. Department of Housing and Urban Development (HUD).

The 2016-2020 Consolidated Plan, Annual Action Plans, Consolidated Annual Performance Reports are available at the following link:

<http://www.oregon.gov/ohcs/pages/consolidated-plan-five-year-plan.aspx>

**Summarize the objectives and outcomes identified in the Plan**

Table 3, AP-20, Annual Goals and Objectives, provides a clear summary of Oregon’s goals and objectives, the needs addressed and the source of funding for each goal outlined in Oregon’s five year Strategic plan.

OHCS has adopted HUD’s purpose for the COVID-19 ESG-CV funds to “prevent, prepare for, and respond to the coronavirus pandemic (COVID-19) among individuals and families who are homeless or receiving homeless assistance; and to support additional homeless assistance and homelessness prevention activities to mitigate the impacts of COVID-19. “ (HUD Notification of Funding; April 2, 2020).

**Evaluation of past performance**

The U.S. Department of Housing and Urban Development’s primary goals for the use of these program funds is to provide decent housing, create suitable living environments and expand economic opportunities. The goals and outcomes table below shows Oregon’s performance in meeting the goals outlined in the 2016-2020 Consolidated Plans’ Strategic Plan over the last three years.

Goal	Category	Expected Strategic Plan	Actual Strategic Plan	Percent Complete
Administration	Affordable Housing Administration	3	3	100.00%
Affirmatively further fair housing	Fair Housing	1	1	100.00%
CDBG - Housing Rehabilitation	Affordable Housing	30	15	50.00%
CDBG - Microenterprise Assistance	Non-Housing Community Development	15	3	20.00%
CDBG - Public Works	Non-Housing Community Development	10	12	120.00%
CDBG - Public/Community Facilities (SL1)	Non-Housing Community Development	3	6	200.00%
CDBG - Public/Community Facilities (SL3)	Non-Housing Community Development	3	2	66.67%

CDBG-Community Capacity/ Technical Asst (1%)	Non-Housing Community Development	15	14	93.33%
CHDO Operating Support Grant	Affordable Housing	4	4	100.00%
Fund affordable housing	Affordable Housing	300	136	45.33%
		200	61	30.50%
Prevent and divert people from becoming homeless	Homeless	2,000	1,744 TBRA	87.20%
		8,500	4,447 ESG	52.32%
Provide people with HIV/AIDS supportive housing	Supportive housing for people with HIV	60	67	121.81%
		133	75	56.39%
Reduce homelessness	Homeless	2,000	4,408 RRH	220.40%
		31,000	12,613	40.69%
	Other	3,800	3,857	101.50%

**Summary of Citizen Participation Process and consultation process:**

The following section outlines the public participation process and consultation process for the 2019 AAP

- A public comment period was held May 13, 2019 through June 12, 2019
- Notice for the plan was published through the following Oregon media outlets: Bend Bulletin, Salem-News.com, Portland Oregonian, Pendleton East Oregonian, and the Medford Mail Tribune
- Notice was sent electronically through Constant Contact to interested parties.
- The 2019 AAP was published on the OHCS website at the following address: <http://www.oregon.gov/ohcs/pages/consolidated-plan-five-year-plan.aspx>
- CARES Act funding was advertised in accordance with HUD guidance. Specifically:
  - ESG CARES Act funding (ESG-CV1) was published for public review on June 18, 2020 but is not be subject to a public comment period.
  - ESG-CV2 was published for public review on October 1, 2020 but is not subject to a public comment period.
  - HOPWA CARES Act funding (HOPWA-CV) was advertised for public comment on June 19, 2020 and available for public comment through June 26, 2020 consistent with the Citizen Participation Plan for a public health emergency.
  - CDBG CARES Act funding (CDBG-CV1 & CDBG CV-2) was advertised for public comment on June 22, 2020 through the CDBG website and on June 24 through

the OHCS website. Public comment was taken through June 28, 2020. There were two ways to provide comment for CDBG funds, through Business Oregon advertisements for the CDBG program itself and through Oregon Housing & Community Services who advertised the CDBG program as a part of a package of changes which included HOPWA changes.

- CDBG CARES Act funding (CDBG-CV3) was advertised for public comment on October 17, 2020 through the CDBG website and Oregonian Newspaper (Print and online)

## **Summary of Public Comments**

### **Summary**

A 30 day public comment period was provided for the 2019 Annual Action Plan, and plan attachments. Notice of the public comment period was published in Oregon media outlets of general circulation, distributed by email to interested parties, and posted on the OHCS website in compliance with Oregon's 2016-2020 Citizen Participation Plan.

The opportunity for Citizen Participation is a critically important aspect in development of an Annual Action Plan. The 2019 Plan offered Oregonians the ability to comment on the Community Development Block Grant program through a public notice announcing a public hearing and public comment period which was published in 'The Oregonian' on Monday, February 11, 2019. The notice was also placed on Business Oregon's website and "pushed out" through the agency's marketing and communications section to persons signed up to receive CDBG listserv notifications. The 30-day public comment period was from February 11, through March 15, 2019 and the Public Hearing was held on March 11, 2019. No comments were received during the public comment period.

Oregonians could also comment on the entire 2019 AAP as this document was advertised using various methods of outreach. Five newspapers requesting public comment were utilized and comments were received from May 13, 2019 - June 12, 2019. Advertisements were made in English and Spanish in 'The Bulletin', and an English advertisement with contact information also in Spanish was made available through 'The Oregonian', 'Salem News', 'East Oregonian' and the 'Medford Mail Tribune'. Information was also posted on the OHCS website. There were four public comments received by OHCS all of which will be provided within the 2019 AAP as attachments. All the public comments were specific to funding Pod Villages similar to Phase 2 of the Kenton Women's Village in Portland Oregon. These villages are small scale (approximately 20 unit) neighborhood based temporary housing programs that provide safety and support for chronically homeless individuals. These units share kitchen and bathroom spaces. Three of the

four comments sought funding for utility infrastructure assistance for a Pod Village project in the planning phase called "The Grotto".

In response to these comments, the State of Oregon congratulates Catholic Charities for their continued support of families in need of housing. We appreciate their efforts and partnership in working to end homelessness in Oregon. Infrastructure assistance is an eligible expense for the CDBG program. However, the State of Oregon does not provide CDBG funding in Portland, Oregon as the City of Portland is an Entitlement City which means they receive CDBG money directly from the Department of Housing & Urban Development. We encourage the commenters to contact the City of Portland to see what priorities have been set for their CDBG program. The State of Oregon would also be able to provide this contact information if requested.

The 2019 CDBG MOD Public comment period opened February 11, 2019, and closed on March 15, 2019. A public hearing was held March 11, 2019. Comments were received from one organization for the CDBG MOD during the public comment period, or at the public hearing.

#### **6/18/2020 - CARES Act Amendment**

In accordance with CARES Act guidance, OHCS displayed ESG-CV1 modifications to the 2019 Annual Action Plan on its website beginning June 18, 2020. On June 19, 2020 these modifications were combined with the HOPWA program CARES Act updates. The HOPWA CARES Act public comment period was open from June 19, 2020 and closed on June 26, 2020. CDBG CV-1 & CV-2 (CARES Act) information was advertised through Business Oregon for 5 days starting on June 22, 2020 and was available for Public Comment. OHCS added the CDBG information to its combined document displayed on the OHCS website beginning June 24, 2020 and extended public comment for CDBG through the combined document through June 29. OHCS did not receive any public comment through its advertisement and public comment process but Business Oregon received multiple public comments through their individual advertising process. Business Oregon responded to all of these comments and a summary can be found in Attachment C.

#### **10/1/2020 – CARES Act Amendment**

In accordance with CARES Act guidance, OHCS displayed ESG-CV2 modifications to the 2019 Annual Action Plan on its website beginning October 1, 2020.

#### **10/17/2020 – CARES ACT Amendment CDBG-CV3**

Additional funding for CDBG CARES Act (CV3) information was advertised through Business Oregon for 5 days starting on October 17, 2020 and was available for Public Comment.



Business Oregon did not receive any public comment through its advertisement and public comment process from this particular period.

## Lead & Responsible Agencies (PR-05)

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### **Agency/entity responsible for preparing/administering the Annual Action Plan**

Following are the agencies/entities responsible for preparing the 2019 Annual Action Plan, and those responsible for administration of each grant program and funding source.

The 2019 Annual Action Plan was developed and completed in a partnership between Business Oregon<sup>1</sup>, Oregon Health Authority (OHA), and Oregon Housing and Community Services (OHCS).

### **The contact information for the participating agencies is as follows:**

#### **Oregon Housing and Community Services**

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#### **Business Oregon**

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<sup>1</sup> The Oregon Business Development Department operates under the assumed business name “Business Oregon” and administers the State of Oregon’s annual federal allocation of Community Development Block Grant (CDBG) funds for non-metropolitan cities and counties.

# Consultation (AP-10)

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## **Introduction:**

Oregon endeavors to provide stable and affordable housing, address poverty, and provide opportunities for Oregonians. To this end, Oregon works with partners across the state; including, state and federal agencies, non-profits, developers, Community Action Agencies, tribes, community members, and many others. In the section below we've highlighted some of the collaborative work that will take place in 2019.

**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**

## **Oregon Statewide Housing Plan:**

Oregon Housing and Community Services (OHCS) is placing a greater emphasis on strategic planning and the way we invest our resources. In 2019 OHCS released *Breaking New Ground: Oregon's Statewide Housing Plan*. This plan marks a new way of doing business for OHCS. It lays the foundation for OHCS to be a data and research driven focused organization, and proposes a new way of collaborating and focusing resources and energy to address the most pressing housing issues facing Oregon today.

*Breaking New Ground: Oregon's Statewide Housing Plan* identifies six priority areas the agency will focus on over the next 5 years. These six priorities include Equity and Racial Justice, Homelessness, Permanent Supportive Housing, Affordable Rental Housing, Homeownership, and Rural Communities. All six priorities require enhanced coordination efforts but the priorities of Homelessness, Permanent Supportive Housing and Rural Communities are particularly reliant on an elevated level of coordination between public and assisted housing providers and private and governmental health, mental health and service agencies.

## **Statewide Supportive Housing Strategic Workgroup:**

The Oregon Health Authority (OHA) and OHCS collaborated to create the Statewide Supportive Housing Strategic Workgroup (SSHWS). This collaborative effort resulted in a list of recommendations mostly focused on the dramatic expansion of Permanent Supportive Housing in Oregon.

Though funding and outcomes will most likely not be directly associated with the Consolidated Plan program, Coordinated Care will play a vital role in identifying Chronically Homeless individuals and families to access housing resources. Development, rental assistance and supportive services will be provided to eligible projects largely as a result of the collaborative efforts that began in this workgroup and as a result of strong Executive Support from Governor Brown. The SSHSW work builds upon the Innovation Accelerator Program (IAP) that OHCS participated in along with Oregon Health Authority and Department of Human Services to looking at Long Term Support Services (LTSS) Housing Related Services and Partnerships track along with 7 other states. This effort was supported by HUD and administrated by Center for Medicare & Medicaid Services (CMS). OHCS continues to work on a housing and health workplan with the Oregon Health Authority through a HRSA supported State Health and Housing Institute in which OHCS and OHA are participating with 4 others states.

### **Operation Welcome Home**

Operation Welcome Home officially launched on November 15, 2018 in Corvallis, Oregon at Seavey Meadows (OHCS funded property for Veterans). Ten communities consisting of 18 counties were selected to participate in this campaign. With the help of a Cloudburst (technical assistance provider who has worked nationally on Veteran homelessness issues) these ten communities agreed to set up an infrastructure to effectively address and end Veterans experiencing homelessness. The infrastructure will consist of a shared Veterans By-name List and a Veteran Leadership Team to match local community resources to Veterans on the list. Operation Welcome Home is funded by Veteran Lottery Dollars and supported by OHCS and ODVA.

### **Addictions and Mental Health Planning and Advisory Council (AHMPAC) & Housing and Olmstead Subcommittee:**

The AHMPAC is essentially a required governing board for the Substance Abuse and Mental Health Services Administration (SAMSHA) and also has oversight on state generated funds. Oregon Housing and Community Services' staff (OHCS Integrator) sit on this subcommittee. Duties include scoring housing development projects funded by OHA. The OHCS Integrator has provided housing 101 trainings to the subcommittee as well as education around Olmstead and the need for more housing case managers to help individuals with substance use disorder (SUD) and severe and persistent mental illnesses (SPMI) to access housing choice. OHCS also assists OHA in their obligations under the Olmstead Act and are currently working to increase the supply of Mainstream Vouchers for Non-Elderly Disabled (NED) individuals who are (a) transitioning out of institutional or other segregated settings, (b) at serious risk of institutionalization, (c) homeless, (d) at risk of becoming homeless.

### **Oregon Rural Permanent Supportive Housing Peer Network**

As a result of rural needs identified during the Statewide Housing Plan Process, OHCS established the Oregon Rural Permanent Supportive Housing Peer Network in 2018. This facilitated training convenes various development, service and non-profit oriented organizations that serve rural communities with the goal of identifying and eliminating barriers to PSH development in rural communities. Training was provided to 10 organizations and materials are disseminated to a broader audience so that practitioners can learn from each other on the facets of supportive housing development, property management, and service provision. This group has committed to a year-long process that includes three in-person events and webinars. The support will wrap up in late 2019 and is supported by HUD's Rural Capacity Building Technical Assistance. We then hope to build off of this work in future endeavors.

### **Department of Human Services (DHS) Key Performance Measure (KPM) Implementation Project Team**

OHCS staff have participated in DHS' Key Performance Measure (KPM) Implementation Project Team for their Self Sufficiency Programs including Temporary Assistance for Needy Families (TANF) and Supplemental Nutrition Assistance Program (SNAP). The goal of the group is to determine what KPM's best measure outcomes associated with poverty reduction and helps tell the story of the impact of important programs like TANF and SNAP.

### **Agriculture Workforce Housing Facilitation Team**

The Agriculture Workforce Housing Facilitation Team ("AWHFT") was formed in an effort to keep abreast of current issues around agricultural workforce housing, resources available for developing agricultural workforce housing, and to address the needs of agricultural workers in Oregon. By Oregon statute, OHCS' role is to help facilitate, create a forum, and provide a place for the team to meet and discuss issues affecting farmworkers in Oregon.

### **Governor's Children's Cabinet and Early Learning**

OHCS staff have participated in the Governor's Children's Cabinet, first convened in 2017 to create pathways toward prosperity for our children and families living in poverty. The Cabinet is made up of leading experts in health, housing, human services, early learning, and education from the public, private, and non-profit sectors. Working collaboratively, the Cabinet has identified the highest priority concerns and existing gaps in services for working families and their children. The Cabinet identified evidence-based solutions that provide the biggest return on investment toward helping families achieve success.

### **Homeless Youth Advisory Council (HYAC)**

OHCS Staff have been active participants in the Homeless Youth Advisory Council whose purpose is to advise the Department of Human Services (DHS), with respect to policies and procedures, to coordinate statewide planning for delivery of services to run away and homeless youth and their families. Work of the advisory council can include, but is not limited to:

- Recommendations toward the development of a statewide framework of shared goals and best practices aligned with the federal Framework to End Youth Homelessness.
- Define and work toward decreasing service gaps in every Oregon county using available knowledge and data.
- Collaboration and coordination with all entities that interact with at-risk and homeless youth to create a network of accessible services.
- Determine ways in which to collect comprehensive data on the state's runaway and homeless youth population.

**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**

**Continuum of Care (CoC):**

Oregon Housing and Community Services has dedicated \$300,000 in discretionary funds to support, enhance and improve the ability of and capacity of the continuums to compete nationally for HUD funding grants. These OHCS funds will assist CoCs to complete research and planning activities to become more competitive in their applications for HUD funds, and will provide consultative support for Continuums that are lagging in meeting HUD requirements such as establishing a viable coordinated entry process. Oregon Housing and Community Services' funding for CoC Assistance grants is awarded through a competitive Request for Proposal (RFP) process.

Continuums are using these funds to purchase equipment with the capabilities to maximize the Coordinated Entry process and better capture data for reporting purposes. Consultants and trainings have been accessed to increase engagement in homeless initiatives and perform gaps analysis.

Oregon Housing and Community Services continues to collaborate with the state's Continuums in development of shared data and protocols via periodic consultations and work groups.

**Coordination of Effort in Response to COVID-19**

OHCS' ESG program leadership have met via Zoom with the state's continuums of care and housing authorities for information about how these entities are serving homeless households and households suffering health-wise or economically affected by COVID-19. OHCS' goals are to use this information to identify and respond to gaps in service and to ensure OHCS works in tandem with the CoCs and housing authorities to provide households with appropriate shelter and effective housing assistance.

Additionally OHCS hosts a statewide homeless taskforce call. The COVID-19 Statewide Homeless Populations Task Force was created to provide a statewide platform for strategizing, information sharing, and collaboration, guidance and resource attainment to support local communities in mitigating the impacts of the COVID-19 pandemic on homeless populations. OHCS uses this information to identify and respond to gaps in services and plan for future interventions. This call occurs weekly to bi-weekly since the onset of COVID. Participants vary widely from local non-profits to representatives of OHCS's Federal partners, including HUD. Currently there are approximately 200 emails on the attendee list. Prior to each meeting OHCS releases a schedule which allows agencies and providers to discern if the days content will be relevant to their work. Information is shared via email and the OHCS website after each meeting.

**Participation with Oregon's Nine Federally Recognized Tribes:**

The 2001 Oregon's Legislature enacted SB 770, formalizing the government-to-government relationship that exists between Oregon's Indian tribes and the State of Oregon. The bill requires state agencies to develop and implement policies on tribal relations. Provisions of the statute also include annual meetings, require key contact designation, and a government-to-government report outlining engagement activities with tribes. Oregon Housing and Community Services participates in quarterly inter-agency Tribal Cluster meetings related to health and human service's needs, and economic and community development needs to build open communication with tribal leaders and staff, and to gain an understanding of critical issues facing tribes. Outside of the SB 770 process, OHCS staff regularly meet individually with each tribe to understand needs and opportunities.

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

OHCS invited CoCs to participate in individual consultations about OHCS' options for allocation of the ESG-CV2 resources.. The goals of these discussions were to engage with CoCs and discuss ESG challenges, and goals and the need for ESG-CV2 funds in each community.

OHCS recognizes that coordination and collaboration between CoCs, OHCS, and OHCS' ESG grantees ensures OHCS will plan our service delivery strategies having a deep understanding about the systems of assistance needed to address homelessness and how respective funding streams can support provision of that assistance.

Oregon Housing and Community Services is the Balance of State (ROCC) Continuum of Care's HMIS administrator. Oregon Housing and Community Services staff members have on-going meetings with ROCC's Coordinator to discuss alignment of ESG standards, data quality expectations and development of performance measures. Oregon Housing and Community Services recently allocated Emergency Housing Assistance discretionary funds to the Community Action Partnership of Oregon (CAPO--ROCC's applicant agency) to support further development of ROCC's governance structure, project prioritization process, performance measures and other ROCC areas in need of development to meet HUD expectations.

Update (10/20): In December, 2019, CAPO, the collaborative applicant for the ROCC, became the ROCC's HMIS administrator.

Emergency Solutions Grant (ESG) funding is utilized within a homeless system of services funded by multiple state and federal funding sources. Several CoC funded projects utilize state funds to meet HUD match requirements. The integration of funding requires OHCS to develop system performance measures that ideally align with HUD's CoC required system performance measurements. Percentage of persons who exit to or retain permanent housing, and percentage of persons who exited to permanent housing and retain permanent housing at six month follow-ups, are two performance measures OHCS is currently measuring to determine appropriate performance benchmarks. Both of these measures are identical to, or closely aligned, with [HUD's CoC System Performance Measures](#), 7b and 2a. For the 2019-2021 biennium, OHCS is determining which additional state and HUD measures will be added, with the ultimate goal of replicating and/or aligning ESG performance measures with HUD's seven required system performance measures.

Continuum of Care consultation regarding ESG funding allocations and projects also occurs during the funding application process. ESG grantees are required to present their proposed ESG funded projects to their respective CoC for review and comment. Documentation of CoC review is required as part of the funding application.

### **Agencies, groups, organizations and others who participated in the process and consultations**

Oregon took a broad approach to consultation for the 2019 AAP; providing notice in newspapers across the state, through e-mail, and making the plan available on the OHCS website.

Additionally OHCS hosts a statewide homeless taskforce call. The COVID-19 Statewide Homeless Populations Task Force was created to provide a statewide platform for strategizing,



information sharing, and collaboration, guidance and resource attainment to support local communities in mitigating the impacts of the COVID-19 pandemic on homeless populations. OHCS uses this information to identify and respond to gaps in services and plan for future interventions. In these calls OHCS staff discuss needs relating

Furthermore, OHCS will host webinars in October for culturally specific agencies as well as other service providers. The goal of these webinars is to understand community concerns, gather input, provide clarification on the goals and intent of ESG funds, and establish connections between service providers and community organizations.

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

There were no agency types that were not provided an opportunity to actively be engaged, or be consulted, in the development of this plan.

## Citizen Participation (AP-12)

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The opportunity for Citizen Participation is a critically important aspect in development of an Annual Action Plan. The 2019 Plan offered Oregonians the ability to comment on the Community Development Block Grant program through a public notice announcing a public hearing and public comment period which was published in 'The Oregonian' on Monday, February 11, 2019. The notice was also placed on Business Oregon's website and "pushed out" through the agency's marketing and communications section to persons signed up to receive CDBG listserv notifications. The 30-day public comment period was from February 11, through March 15, 2019 and the Public Hearing was held on March 11, 2019. No comments were received during the public comment period.

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In response to these comments, the State of Oregon congratulates Catholic Charities for their continued support of families in need of housing. We appreciate their efforts and partnership in working to end homelessness in Oregon. Infrastructure assistance is an eligible expense for the CDBG program. However, the State of Oregon does not provide CDBG funding in Portland, Oregon as the City of Portland is an Entitlement City which means they receive CDBG money directly from the Department of Housing & Urban Development. We encourage the commenters to contact the City of Portland to see what priorities have been set for their CDBG program. The State of Oregon would also be able to provide this contact information if requested.

## Expected Resources (AP-15)

### Introduction:

In 2019 Oregon expects to make the following HUD funds available for the program year:

- CDBG \$ 13,277,173
- HOME \$ 8,873,567
- HTF \$ 3,451,918
- HOPWA \$ 557,084
- ESG \$ 1,881,446
- ESG-CV-1 \$ 6,748,493
- ESG-CV-2 \$ 49,430,143
- HOPWA-CV \$ 85,314
- CDBG-CV-1 \$ 8,004,314
- CDBG-CV-2 \$ 10,749,023
- CDBG-CV3 \$ 7,548,838

HUD funds will be used in conjunction with other federal, state, and local funding to maximize investments in affordable housing and community development activities.

### Anticipated Resources

Table 1/2 - Expected Resources – Priority Table

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 3	Expected Amount Available	Narrative Description
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							Remainder of ConPlan \$	
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total:\$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	13,277,173			13,277,173	13,277,173	See the narrative description in the Appendix, Attachment <b>D.</b>
HOME	public - federal	Multifamily Acquisition Multifamily rental new construction Multifamily rental rehab TBRA, CHDO Operating Support Grants	8,873,567			8,873,567	8,873,567	OHCS focuses the HOME program on new construction, and acquisition and rehabilitation of multifamily rental units, TBRA, and CHDO Operating Support Grants
HTF	public- federal	Multifamily Acquisition Multifamily rental new construction Multifamily rental rehab	3,451,918			3,451,918	3,451,918	HTF is an affordable housing production program that is leveraged with other federal and state funding. It is made available through OHCS annual LIHTC and HOME NOFA as an additional source of funding for multifamily rental housing projects with units affordable to extremely low income households.
HOPWA	public - federal	Permanent housing placement Supportive services TBRA  Admin	557,084			557,084	557,084	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	1,881,446			1,881,446	1,881,446	OHCS includes homelessness prevention programs in the ESG program.
Other ESG-CV1	Public-Federal	Shelter Street Outreach Rapid Rehousing Homeless Prevention	\$6,748,493			\$6,748,493	\$6,748,493	Services for households affected by COVID-19. Street outreach to unsheltered homeless persons, shelter including hotel/motel vouchers, shelter services, emergency rent and utility assistance, payment of move-in deposits, multi-month rent subsidy and housing stabilization. SEE NOTE 1
ESG-CV2		Shelter, Street Outreach, Rapid Rehousing, Homelessness Prevention, HMIS/Data entry	\$49,430,143			\$49,430,143		Services for households affected by COVID-19. Street outreach to unsheltered homeless persons. Shelter including hotel/motel vouchers and other non-congregate and social distancing options, shelter services, case management, emergency rent and utility assistance, payment of move-in deposits, multi-month rent subsidy and housing stabilization. SEE NOTE 2

Other HOPWA-CV	Public-Federal	Facility Based Housing Subsidy Assistance - Leasing	\$85,314			\$85,314	\$85,314	OHA will use HOPWA-CV to fund relocation services and temporary lodging to address the needs of people living with HIV/AIDS related to coronavirus prevention, preparedness, and response.
Other CDBG-CV-1	Public-Federal	Admin and Planning	\$8,004,314			\$8,004,314	\$8,004,314	See the CDBG Method of Distribution (Attachmentd D)
		Emergency Rental Assistance	\$10,749,023			\$10,749,023	\$10,749,023	
CDBG-CV-2		Small Business/Microenterprise assistance	\$7,548,838			\$7,548,838	\$7,548,838	
CDBG-CV-3		Special ED/CF and Public Service						

**Note 1:** A culturally specific service agency that was allocated ESG-CV1 funds has declined the allocation, leaving \$361,888.16 unfunded. OHCS is pursuing HMIS software upgrades and asks the ESG-CV1 Substantial Amendment show the unused ESG-CV1 funds will be used for this HMIS purpose.

**Note 2:** OHCS asks that approval of the ESG-CV2 Substantial Amendment allow OHCS to use up to \$138,111.84 for HMIS upgrades because the cost of the planned upgrades exceeds \$361,888.16 available from the allocation of ESG-CV1.

**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. Oregon Housing and Community Services may consider exceptions on a case-by-case basis in consultation with the sub-grantee. Oregon Housing and Community Services ESG program does not generate program income.

The match requirement for the ESG-CV allocations has been waived.

### 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 (LIEAP). 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 publically owned land or property located within the jurisdiction that may be used to address the needs identified in the plan**

In the 2015 legislative session HB 3524 was passed, which requires the state, when selling or disposing of appropriate real property, to provide notification to developers of affordable housing. However, most parcels that are disposed of are remnant lots and may not be suitable for housing development. Oregon Housing and Community Services will work with the Oregon Department of Administrative Services to provide notification to affordable housing developers.

In the 2019 legislative session HB 2360 is being considered. HB 2360 would create a Task Force for the purpose of understanding the potential for using surplus public land for housing purposes. If passed, some exciting and innovative ideas may come forth regarding how to link publically owned property to affordable housing development.



# Annual Goals and Objectives (AP-20)

## Goals Summary Information

**Table 3 – Goals Summary**

Goal Number	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	CDBG - Public Works	2016	2020	Non-Housing Community Development	None	CDBG-Public Works	CDBG: \$6,772,795	2 Projects
2	CDBG - Public/Community Facilities (SL1)	2016	2020	Non-Housing Community Development	None	CDBG-Public/Community Facilities	CDBG: \$1,277,886	1 Project
3	CDBG - Public/Community Facilities (SL3)	2016	2020	Non-Housing Community Development	None	CDBG-Public/Community Facilities	CDBG: \$0	0 Projects
4	CDBG –Public/Community Facilities (DH1)	2016	2020	Homeless/Non-Homeless special Needs	None	CDBG-Public/Community Facilities	CDBG: \$1,277,886	1 Project
5	CDBG - Microenterprise Assistance	2016	2020	Non-Housing Community Development	None	CDBG-Microenterprise Assistance	CDBG: \$255,577 CDBG CV-1: \$2,977,604.80 CDBG CV-2: \$3,998,637 CDBG CV-3: \$2,808,168	50 Businesses Assisted
6	CDBG - Housing Rehabilitation	2016	2020	Affordable Housing	None	CDBG-Housing Rehabilitation	CDBG: \$3,194,714	100 Housing Units

7	CDBG - Community Capacity/ Technical Assistance	2016	2020	Non-Housing Community Development	None	CDBG-Community Capacity/Technical Assistance	CDBG: \$132,772 CDBG CV-1: \$2,223,203.60 CDBG CV-2: \$2,998,977 CDBG CV-3: \$2,106,126	3 Projects
8	CDBG – Emergency Projects	2016	2020	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.
9	Prevent and divert people from becoming homeless	2016	2020	Homeless	None	Rental Assistance	HOME: \$1,863,449 ESG: \$517,398 *ESG-CV1: \$1,687,124 ESG-CV2: \$12,357,536 CDBG CV-1: \$2,233,203.60 CDBG CV-2: \$2,998,977 CDBG CV-3: \$2,106,126	Tenant-based rental/rapid rehousing assistance for 400 households. Homelessness Prevention for 8,200 persons
10	Reduce homelessness	2016	2020	Homeless	None	Rapid Rehousing with Supportive Services Rental Assistance Shelter Beds and Homeless Services Street Outreach	ESG: \$1,222,939 ESG-CV1: \$4,386,520 ESG-CV2: \$32,129,593	Tenant-based rental/rapid rehousing assistance for 5,250 persons; Shelter: 10,000 persons; Street Outreach: 6,750 persons

11	Fund affordable housing	2016	2020	Affordable Housing	None	Accessible Housing Affordable Housing Rehabilitation and Preservation of Units	HOME: \$5,679,083  HTF: \$3,106,726	Rental units constructed: 60 Housing Units Rental units rehabilitated: 30 Housing Units  Accessible Units: Minimum of five percent of units built.
12	Affirmatively further fair housing	2016	2020	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.
13	Provide people with HIV/AIDS supportive housing	2016	2020	Other / Supportive housing for people with HIV	None	Permanent Housing with Supportive Services Rental Assistance  Relocation Services and Temporary Lodging	HOPWA \$540,371  HOPWA-CV \$80,195	Tenant-based rental for 60 households  Facility Based Housing Subsidy Assistance - Leasing for 8 households
14	CHDO Operating Support Grant	2016	2020	Affordable Housing	None	Affordable Housing	HOME: \$443,678	To provide operating support grants to 4 certified CHDOs that are actively involved in development of a HOME assisted affordable housing project.
15	Administration	2016	2020	Affordable Housing Administration	None	Accessible Housing Affordable Housing  Administration	HOME: \$887,357  CDBG: \$365,543  HTF: \$345,192  HOPWA: \$16,713  ESG: \$141,109	A percentage of each program allocation is generally allowed for administration costs.

								*ESG CV1: \$674,849 ESG-CV2: \$4,943,014 HOPWA CV: \$5,119 CDBG CV-1: \$560,302 CDBG CV-2: \$752,432 CDBG CV-3: \$528,418
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**\*NOTE:** ESG CV 1 admin rate has been updated to %10. It was previously documented as %7.5. The *Administration* dollars increased were offset from *Prevent and divert people from becoming homeless*.

### Goal Descriptions

**Table 4 – Goal Descriptions**

1	<b>Goal Name</b>	<b>CDBG - Public Works</b>
	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	<b>Goal Name</b>	<b>CDBG - Public/Community Facilities (SL1)</b>
	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	<b>Goal Name</b>	<b>CDBG - Public/Community Facilities (SL3)</b>
	Goal Description	Rehabilitation or construction of drug and alcohol treatment centers, Head Start facilities, mental health and health clinics, and sheltered workshops for people with disabilities.
4	<b>Goal Name</b>	<b>CDBG - Public/Community Facilities (DH1)</b>
	Goal Description	Rehabilitation/ construction of domestic violence shelters, emergency/ homeless shelters.
5	<b>Goal Name</b>	<b>CDBG - Microenterprise Assistance</b>

	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.
<b>6</b>	<b>Goal Name</b>	<b>CDBG - Housing Rehabilitation</b>
	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.
<b>7</b>	<b>Goal Name</b>	<b>CDBG - Community Capacity/ Technical Assistance</b>
	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.
<b>8</b>		<b>CDBG - Emergency Projects</b>
		<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"> <li>○ Officially declared by the Governor as a "State of Emergency" needing immediate action; and, or</li> <li>○ A presidential disaster declaration has been issued for the event</li> </ul> <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>
<b>9</b>	<b>Goal Name</b>	<b>Prevent and divert people from becoming homeless</b>
	Goal Description	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.
<b>10</b>	<b>Goal Name</b>	<b>Reduce homelessness</b>

	Goal Description	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.
<b>11</b>	<b>Goal Name</b>	<b>HOME and HTF- Fund affordable housing</b>
	Goal Description	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.
<b>12</b>	<b>Goal Name</b>	<b>Affirmatively further fair housing</b>
	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.
<b>13</b>	<b>Goal Name</b>	<b>Provide people with HIV/AIDS supportive housing</b>
	Goal Description	<p>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.</p> <p>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. 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.</p>

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14	<b>Goal Name</b>	<b>Provide support grants to certified CHDOs</b>
	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	<b>Goal Name</b>	<b>Administration</b>
	Goal Description	State Administration of CDBG program and HOME Program

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## Allocation Priorities (AP-25)

The following section describes the reasons for program allocation priorities and how the distribution of funds will address the priority needs and goals of the Strategic Plan.

### Funding Allocation Priorities

**Table 5 – Funding Allocation Priorities**

	CDBG*	CDBG CV-1, 2 & 3	HOME	HTF	HOPWA	HOPWA CV-1	ESG	ESG CV-1**	ESG CV-2
CDBG – Public Works (%)	53	0	0	0	0	0	0	0	0
CDBG – Public/Community Facilities (SL1) (%)	9	0	0	0	0	0	0	0	0
CDBG – Public/Community Facilities (SL3) (%)	9	0	0	0	0	0	0	0	0
CDBG – Housing Rehabilitation (%)	24	0	0	0	0	0	0	0	0
CDBG – Micro-enterprise (%)	2	40	0	0	0	0	0	0	0
CDBG – Community Capacity/Technical Assistance (%)	1	30	0	0	0	0	0	0	0
Prevent and divert people from becoming homeless (%)	0	30	21	0	0	0	27.5	25	25
Reduce homelessness (SL1) (%)	0	0	0	0	0	0	65	65	65
Fund affordable housing (%)	0	0	64	90	0	0	0	0	0
Support Grants for CHDOs	0	0	5	0	0	0	0	0	0



Provide people with HIV/AIDS supportive housing (%)	0	0	0	0	97	94	0	0	0
Affirmatively further fair housing (%)	0	0	0	0	0	0	0	0	0
Administration	2	7	10	10	3	6	7.5	10	10
Total (%)	100	100	100	100	100	100	100	100	100

\* The CDBG calculation is not reflecting the true priority allocation as the funding priority is set after the calculation of 2% state administration + 1% technical assistance is taken out of the overall grant amount. The true priority allocation can be found within Chapter 1 (page 2) of the 2019 CDBG Method of Distribution. Due to the administrative complexities associated with CDBG CARES Act grant funding, Business Oregon is setting 7 percent of its CDBG-CV grant combined for general administration and technical assistance costs.

\*\* ESG CV 1 admin rate has been updated to %10. It was previously documented as %7.5.

## **Reason for Allocation Priorities**

### **Community Development Block Grant (CDBG):**

Community Development Block Grant priorities were identified based on previous program demands, past experience, and Business Oregon's cost/benefit analysis. By allocating the funds in this manner it provides the state investment flexibility. Business Oregon 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.

### **HOME Investment Partnerships Program (HOME):**

Oregon Housing and Community Services' funding priorities were established based on the depth of need for affordable rental housing resources in the community.

Sixty four percent of OHCS' HOME funding is used to finance the development of multifamily housing in the Balance of State where there is tremendous unmet need for affordable rental housing. Up to five percent of the HOME funds are used to support Community Housing Development Organizations (CHDO) in order to ensure performance, and to meet the HOME Program's required 15 percent of funding to CHDO sponsored housing projects.

The percentages for the ESG and HOME TBRA goals are determined by subgrantee applications submitted through the funding application process. Applications are reviewed by OHCS 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 for ESG: severe housing burden, poverty, and homelessness. Funds are made available upon approval of each subgrantee's application and execution of their Master Grant Agreement (MGA). Four criteria are used for HOME TBRA: housing burden, severe housing burden, poverty, and income below 50 percent median.

### **Housing Trust Fund (HTF):**

The funding priorities for HTF are consistent with those of the HOME program. The HTF funds are used to finance units affordable to those who are extremely low income (30 percent of median). HTF funds are available for investment statewide. In 2018, OHCS included HTF for the first time in the HOME and LIHTC NOFAs. Of 28 total applications received, 18 requested HTF funds, and 10 received reservations of HTF funding. Two projects met the conditions of reservation and were funded in 2018, while the remaining 8 projects are continuing pre-development. The 2019 HOME and LIHTC NOFAs are now underway.

### Emergency Service Grant (ESG):

The State of Oregon's priorities for funding in 2019-2021 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 work place. 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 has forced subgrantees to spend towards prevention and shelter, which is reflected in the allocation priorities.

ESG-CV are federal funds allocated in response to the need to assist the nation's homeless population as they battle the COVID-19 pandemic. Homeless persons, both unsheltered and sheltered, are at high risk of contracting COVID-19 and can easily spread it to others. Persons already homeless have no way to take protective steps or self-isolate when ill. ESG-CV usage will assist with non-congregate and social distancing shelter, including hotel/motel vouchers, outreach and services for the state's homeless population, including those whose health has been affected by COVID-19.

Additionally, the loss of income affecting many low-income households during and after the COVID-19 pandemic will threaten their ability to pay monthly rent and utilities during the pandemic will be magnified as they struggle to cover current and past due costs in the future. ESG-CV will be used to minimize the loss of housing stability by assisting households to pay their rent and utility costs, or to find new housing, ensuring these households do not become homeless.

OHCS has been allocated funds from the state Legislature for rent assistance subsidy. These funds are best suited for homelessness prevention. OHCS will structure the ESG-CV funding to emphasize services to the homeless, shelter operations, and rapid re-housing, with a lesser focus on homelessness prevention.

### Housing Opportunities for People with HIV/AIDS (HOPWA):

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 distribution of funds address the priority needs and specific objectives described**

## **in the Consolidated Plan?**

### **Community Development Block Grant (CDBG):**

Community Development Block Grant 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 does allow a state to establish funding priorities among the types of eligible activities. In accordance with the HCDA, Oregon 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 as an attachment.

The top priority needs to be addressed with CDBG funds are public works, community facilities, housing and microenterprise assistance (53%, 20%, and 25%, and 2%, respectively). 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 as an attachment.

### **HOME Investment Partnerships Program (HOME):**

The HOME Investment Partnerships Program funding priorities are designed to specifically address objectives of increasing and preserving the states affordable housing resources. HOME Investment Partnerships Program 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 Tenant Based Rental Assistance (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 subgrantees 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.

### **Housing Trust Fund (HTF):**

Housing Trust Fund is a federal affordable housing production program that is 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 with units affordable to extremely low income (ELI) households.

### **Emergency Solutions Grant (ESG):**

Distribution of ESG funds used to reduce homelessness addresses three priority needs: rapid rehousing with supportive services, rent assistance, and shelter beds and homeless services.

The state's priorities for funding for 2019 – 21 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 work place. 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 has forced subgrantees to spend towards prevention and shelter, which is reflected in the allocation priorities.

Furthermore, OHCS is working diligently to ensure that equity is integrated into every aspect of the state's COVID-19 response and recovery efforts and beyond. COVID-19 does not affect all communities equally and people of color are more likely to experience the nefarious effects of the pandemic. The CV 2 funds and OHCS's new competitive funding process will allow OHCS to address disparities by directing resources for an equitably recovery that include culturally specific organizations. As a state agency, we have an obligation to examine how we can most responsibly and constructively serve all communities. In particular, communities of color are overrepresented in both shelter and Veteran populations.

#### Housing Opportunities for Persons with HIV/AIDS (HOPWA):

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.

# Methods of Distribution (AP-30)

## Introduction

The CDBG, ESG, HOME, HTF, and HOPWA programs included in the Consolidated Plan all distribute funds in different way. The table below outlines details of each program’s method of distribution.

## 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, public/ community facilities, housing rehabilitation, microenterprise assistance, community capacity/technical assistance and emergency projects.  Under CARES Act: Emergency Rental Assistance, Special Economic Development/Community Facilities Improvements, public service.
	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 chapters 1 through 7 of the 2019 CDBG MOD (Appendix, Attachment D), as amended.
	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. The 2019 CDBG MOD is included as Attachment D, as amended.
	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. Major considerations include the project being a CDBG eligible activity and the projects ability to meet a national objective. Grant size limits for 2019 are as follows: public works projects-\$2,500,000; community 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. Business Oregon was the recipient of CARES Act (CV1 & CV2) funding and has determined CV1 and CV2 funds will be used in the following category; emergency rental assistance projects - \$5,453,481; Special ED/CF & Public Service (PPE) projects - \$5,453,481; Small Business/Microenterprise assistance - \$7,271,308. Detailed information can be found in the 2019 MOD (Appendix, Attachment D), as amended.
	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
	Funding Sources:	ESG, ESG-CV1, ESG-CV2
	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.

	<p>Describe all of the criteria that will be used to select applications and the relative importance of these criteria.</p>	<p>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 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.</p> <p>ESG-CV2 will be allocated in a process OHCS has not been able to use in the past. Our allocation of ESG-CV2 funds will be bifurcated. Initially, OHCS will allocate \$7 million of Phase 2 ESG-CV to Community Action Agency partners utilizing an updated formula to account for the current crisis. The formula will be based on four key factors:</p> <ol style="list-style-type: none"> <li>1. Homelessness</li> <li>2. Housing Instability</li> <li>3. COVID-19 Factors</li> <li>4. Equity</li> </ol> <p>For the balance of ESG-CV2 funds, OHCS will offer a competitive funding process in the form of a Request for Applications. In Oregon’s 2020 special legislative session, OHCS sought and received flexibility via HB 4304 that allows options to OHCS’ mandatory process of allocating Homeless Services funds</p>
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		<p>Application criteria will include but not be limited to:</p> <ol style="list-style-type: none"> <li>1. Agency capacity to deliver services</li> <li>2. Culturally specific services</li> <li>3. Collaboration across service providers</li> <li>4. Merging of fund sources</li> <li>5. Adherence to best practices</li> </ol> <p>OHCS will establish regional allocation areas based on CoC regions in order to align the competitive ESG-CV funds with ongoing community efforts and planning. As part of the application, OHCS' will provide stakeholders with allocation information to position all communities to effectively plan for utilization of ESG CV 2 funds with full sight of available resources by region.</p> <p>Applicants will be required to meet all federal and state requirements of the ESG-CV program.</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. Historically, 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 was 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. This is still the mechanism by which ESG, ESG CV 1 and part of ESG CV 2 funds are allocated. OHCS will bifurcate the ESG-CV2 funding into two separate processes.</p>

	<p>OHCS will allocate \$7 million of Phase 2 ESG-CV to Community Action Agency partners utilizing an updated formula to account for the current crisis. The formula will be based on four key factors:</p> <ol style="list-style-type: none"> <li>1. Homelessness</li> <li>2. Housing Instability</li> <li>3. COVID-19 Factors</li> <li>4. Equity</li> </ol> <p>In Oregon’s 2020 special legislative session, OHCS sought and received flexibility via HB 4304 that allows options to OHCS’ mandatory process of allocating Homeless Services funds. For the balance of ESG-CV2 funds, OHCS will offer a competitive funding process in the form of a Request for Applications.</p> <p>OHCS will establish regional allocation areas based on CoC regions in order to align the competitive ESG-CV funds with ongoing community efforts and planning. As part of the application, OHCS’ will provide stakeholders with allocation information to position all communities to effectively plan for utilization of ESG CV 2 funds with full sight of available resources by region.</p> <p>Applicants will be required to meet all federal and state requirements of the ESG program.</p> <p>Furthermore, 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. This occurs in both the allocation and Master Grant Agreement process as well as the in the competitive application process.</p>
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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 ESG.
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. HUD has waived the requirement to meet the limitations of 24 CFR 576.100 for ESG-CV funds.
Describe threshold factors and grant size limits.	<p>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 funding formula used for ESG and ESG-CV1 allocations utilizes three data elements: severe housing burden, poverty, and homelessness.</p> <p>The formula to determine allocation amounts for community action agencies for ESG-CV2 will be based on four key factors:</p> <ol style="list-style-type: none"> <li>1. Homelessness</li> <li>2. Housing Instability</li> <li>3. COVID-19 Factors</li> <li>4. Equity</li> </ol> <p>For the competitive process, factors that limit grant size are inclusive of but not limited to:</p> <ol style="list-style-type: none"> <li>1. Feasibility of project.</li> <li>2. Project size must be informed by homeless data (preferably HMIS).</li> <li>3. Current capacity of agency including staff.</li> <li>4. Demonstrations of past successful execution of similar projects and adherence to ESG rules and regulations.</li> </ol> <p>Thresholds may include ability to use HMIS, planful collaboration, demonstration of need, and adherence to state goals.</p>

	What are the outcome measures expected as a result of the method of distribution?	Emergency Solutions Grant (ESG) subrecipients 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.	<p>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.</p> <p>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.</p>
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 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.	

	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).
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, community based organizations such as CHDOs, community development corporations, and Community Action agencies. Any specific funding restrictions are established in individual NOFAs as applicable.

		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).
	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.
4	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 Attachment Z of the Appendix of the 2016-2020 Consolidated Plan Amendment at the following link: <a href="http://www.oregon.gov/ohcs/pages/consolidated-plan-five-year-plan.aspx">http://www.oregon.gov/ohcs/pages/consolidated-plan-five-year-plan.aspx</a> .
	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 available to units of general local government, and	Not applicable to HTF.

	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.	<p>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.</p> <p>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.</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.
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.

<p>other state publications describing the application criteria? (CDBG only)</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>Not applicable to HOPWA.</p>
<p>Identify the method of selecting project sponsors (including providing full access to grassroots faith-based and other community-based organizations). (HOPWA only)</p>	<p>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.</p>
<p>Describe how resources will be allocated among funding categories.</p>	<p>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.</p>
<p>Describe threshold factors and grant size limits.</p>	<p>Oregon Health Authority does not utilize a request for proposal process</p>
<p>What are the outcome measures expected as a result of the method of distribution?</p>	<p>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.</p>



## Projects (AP-35)

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No projects have been identified for plan year 2019 as of the drafting of this plan. The 2019 AAP will be amended, and resubmitted, if projects are identified and input into HUD's Integrated Disbursement and Information System (IDIS).

In response to the economic impact of the COVID-19 pandemic, the Community Development Block Grant (CDBG) program has been utilized as a vehicle to route The Coronavirus Aid, Relief, and Economic Security Act (CARES Act). CARES Act was signed into law by the President on March 27, 2020 which appropriates \$5 billion in additional CDBG Program funding to state and entitlement communities throughout the nation. Of the \$5 billion set aside for CDBG (which is coded and known now as CDBG-CV1), the State Oregon is projected to receive \$8,004,314 while under the 2<sup>nd</sup> round of the CARES Act Allocation (CDBG-CV2) the State will be receiving approximately \$10,722,989. Under the 3<sup>rd</sup> round of the CARES Act Allocation (CDBG-CV3) the State has recently been informed it will receive approximately \$7,548,838.

In order for Business Oregon to access the CDBG-CV funding HUD requires an amendment to the 2019 Program year Annual Action Plan (AAP) and Method of Distribution (MOD) identifying how Business Oregon intends to use the CDBG-CV funding. The amended 2019 MOD, AAP and completion of the SF-424 would be the State of Oregon's application for both, CDBG –CV1 and CDBG-CV2, and must be reviewed by HUD before funds will be released to Business Oregon. Staff work with Oregon Housing and Community Services, who is the lead in creation of State Oregon Consolidated planning and report for all HUD funding administered by the state, to submit these documents to HUD for their review.

At the time of this amendment no projects have been identified however Business Oregon has identified the following categories eligible for CARES Act funding:

	CDBG-CV1	CDBG-CV2	CDBG-CV3	Total
<b>CDBG-CV Allocation from HUD</b>	<b>\$8,004,314</b>	<b>\$10,749,023</b>	<b>\$7,548,838.00</b>	<b>\$26,302,175</b>
State Administration 7%	\$560,302	\$752,432	\$528,418	\$1,841,152
<b>CDBG-CV Allocation Available for Projects</b>	<b>\$7,444,012</b>	<b>\$9,996,591</b>	<b>\$7,020,420</b>	<b>\$24,461,023</b>
Emergency Rental Assistance	\$2,233,203.61	\$2,998,977	\$2,106,126	\$7,338,306.83
Special ED/CF& Public Service (PPE)	\$2,233,203.61	\$2,998,977	\$2,106,126	\$7,338,306.83
Small Business/ MicroEnterprise assistance	\$2,977,604.81	\$3,998,637	\$2,808,168	\$9,784,409.10

As a measure to prepare the program, an additional chapter within 2019 Method of Distribution (MOD) was created to specifically set to allow the agency to access the current funding to address current need to help COVID-19.

**Describe the reasons for allocation priorities and any obstacles to addressing underserved needs.**

This question will be answered in the 2019 CAPER for the HOME and HTF programs as the allocation priorities will be provided in the 2019 NOFA. HOPWA will discuss obstacles to addressing underserved needs in the 2019 CAPER. For CDBG, the program priorities are outlined in the 2019 Method of Distribution (MOD), which is attached to this plan. Emergency Solutions Grant (ESG) is allocated by formula and competitive application. Allocating by formula and competitively allows us to support the existing homeless services system as well as incorporate other service providers to expand the system.

## Section 108 Loan Guarantee (AP-40)

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**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 Community Development Block Grant program Section 108 Loan Guarantees are not currently identified as a priority of funding, however, Business Oregon is considering exploring the possibility of using its CDBG funds in this manner in the future.

# Community Revitalization Strategies (AP-45)

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**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 CDBG 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.

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## Geographic Distribution (AP-50)

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### **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. Emergency Solutions Grant (ESG) funds are allocated across the state, with the exception of Clackamas County.

### **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 Chapter 7 of the CDBG Method of Distribution (MOD), Attached to this document.

#### 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 21 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 subrecipients in the non-entitlement areas of the state. Each subrecipient may coordinate with local entitlement areas to permit participating households to use the assistance outside the subrecipient'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.

Allocation of phase 1 of ESG-CV will adhere to the formula by which ESG is distributed.

ESG-CV2 will be allocated in a process OHCS has not been able to use in the past. Our allocation of ESG-CV2 funds will be bifurcated. Initially, OHCS will allocate \$7 million of Phase 2 ESG-CV to Community Action Agency partners utilizing an updated formula to account for the current crisis. The formula will be based on four key factors:

1. Homelessness
2. Housing Instability
3. COVID-19 Factors
4. Equity

In Oregon's 2020 special legislative session, OHCS sought and received flexibility via HB 4304 that allows options to OHCS' mandatory process of allocating Homeless Services funds. For the balance of ESG-CV2 funds, OHCS will offer a competitive funding process in the form of a Request for Applications.

1. Feasibility of project.
2. Project size must be informed by homeless data (preferably HMIS).
3. Current capacity of agency including staff.
4. Demonstrations of past successful execution of similar projects and adherence to ESG rules and regulations.
5. Alignment with state goals.

Regional allocations will be determined by each CoC geographic region in order to align these funds with ongoing community efforts and planning. This information will include **the amount of ESG CV 2 funds that will be competitively available by CoC geographic region**. The goal is to provide stakeholders with allocation information to position all communities to effectively plan for utilization of ESG CV 2 funds with full sight of available resources by region.

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)

This section specifies goals for the number of homeless, non-homeless, and special needs households to be provided affordable housing within the program year. It indicates the number of affordable housing units that will be provided by program type, including rental assistance, production of new units, rehabilitation of existing units, or acquisition of existing units.

**Table 8- One Year Goals for Affordable Housing by Support Requirement**

One Year Goals for the Number of Households to be Supported	
Homeless	805
Non-Homeless	250
Special-Needs	68
Total	1123

**Table 9 - One Year Goals for Affordable Housing by Support Type**

One Year Goals for the Number of Households Supported Through	
Rental Assistance	963
The Production of New Units	60
Rehab of Existing Units	100
Acquisition of Existing Units	0
Total	1123

### 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' activity. 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 Business Oregon.

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.

OHCS is expected to support 400 households with rental assistance through HOME TBRA and 1,700 through ESG Homelessness Prevention for 2018.



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 Section 8, or to self-sufficiency. In 2019, OHA will support 60 households with tenant based rental assistance through HOPWA formula funds. OHA will support 8 households per year with hotel/motel assistance through HOPWA formula CARES Act funds.

# Public Housing (AP-60)

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## 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 PHA's 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 PHA's 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 is currently exploring potential opportunities to utilize state funding such as the General Housing Account Program to provide technical assistance to troubled PHA's in Oregon. No formal program has materialized as of this date as discussions are in the initial phase.

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# Homeless and Other Special Needs Activities (AP-65)

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## Introduction:

OHCS, through its Community Action Agency (CAA) network, uses ESG funds to provide street outreach, emergency shelter, transitional housing, 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 upon rapid re-housing. 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, 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.

Update (10/20): OHCS made ESG and ESG-CV1 allocations to the CAA network using our standard funding formula. ESG-CV2 allocations will be bifurcated. One process will fund \$7 million to the CAA network using a Covid-19 focused formula. The remaining funds will be allocated through a competitive RFP to both CAAs and other service providers. Using the RFP process will allow OHCS to fund agencies that serve with a focused purpose, such as culturally or Latinx specific.

ESG-CV funds have the specific purpose of assisting households whose lives have been affected by the COVID-19 pandemic. The homeless population is particularly susceptible because they have no shelter or washing facilities, or they are in shelters where social distancing is not possible. They are often more at risk for poor health outcomes or other trauma. ESG-CV will assist providers to complete outreach activities and provide homeless persons with appropriate shelter, including hotel/motel vouchers.

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.

This is a critical time for Oregon; many communities are experiencing a housing crisis, and some have declared a housing state of emergency in order to address any delay or barrier to serving the increasing numbers of people experiencing homelessness. Oregon Housing and Community Services is responding to the stark landscape with every tool available to help communities provide more stable housing to Oregonians with low incomes.

The 2016-2020 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 2016-2020 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 Business Oregon.

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 grantees across the state, will 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. Support can include, but is not limited to, outreach, non-congregate and social distance shelter and essential services, permanent housing, rental assistance, case management, and assistance with self-sufficiency opportunities.

Even though the priority is to use ESG funding to quickly re-house homeless individuals through either rapid re-housing or Housing First activities, Oregon faces a homelessness crisis which requires immediate funding for shelters and outreach be readily available to our subrecipients. The effects of this shelter-gap have been exacerbated the pandemic. The threat of COVID 19 mandates that shelters be non congregate or have social distancing protocols, which reduces the number and availability of beds. ESG-CV funds will be used to meet the needs of Oregon's

unsheltered and high needs populations to overcome the disproportionate effects of COVID-19 on Communities of Color and to safely shelter homeless persons affected by COVID-19.

Outreach includes making people experiencing homelessness 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 subrecipients 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 subrecipients 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. By using ESG-CV2 to incorporate culturally specific organizations through the competitive allocation process, OHCS will expand the homeless services network and deepen community penetration to improve services to all Oregonians.

Continuums of Care and service agencies across Oregon are at various stages of developing and implementing comprehensive Coordinated Entry systems. Coordinated Entry systems allow the provider the ability 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. In the coming biennium, OHCS will offer training to our subrecipients to ensure they understand the components of a good Coordinated Entry system. OHCS will be available to assist subrecipients in enhancing or expanding existing Coordinated Entry systems.

### **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. OHCS will 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. OHCS will lean on these studies and new partners to reimagine and strengthen Oregon's shelter system under a non-congregate framework to incorporate culturally specific services and adhere to social distancing guidelines.

**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 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 and other service provider 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 subrecipients 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. When use of shelters is necessary, OHCS is working with our subrecipients to identify and institute low-barrier components into their shelter configurations.

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 subrecipients have realized the value of having a dedicated staff position to concentrate on identifying and securing housing units for their program participants, and have added this position to their staff. 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.). Community Action Agencies work closely 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 extensive information and referral, and are key participants in their respective Continuums of Care (CoC), which enables them to be a community hub for linking low-income people to mainstream supportive services. Community Action Agencies maintain partnerships with systems of care to ensure coordination and to avoid duplication of services. These systems include serving foster youth, individuals with disabilities, veterans, people leaving correctional institutions, people discharged from hospitals, homeless students, and victims of domestic violence. Community Action Agencies work with area partners, small businesses, government entities, and property managers to help low-income people who have a criminal history successfully overcome barriers to re-entering communities.

Service providers not in the CAA network can also serve as key points of access to services for low income individuals and families and individuals being discharged from publicly funded institutions. By using ESG-CV2 to expand the subgrantee pool and be inclusive of other service providers, OHCS will deepen community penetration and deepen the array of services that can be offered.

# HOPWA Goals (AP-70)

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AAP Table 10 - One Year HOPWA Goals

One year goals for the number of households to be provided housing through the use of HOPWA for:	
Short-term rent, mortgage, and utility assistance to prevent homelessness of the individual or family	
Tenant-based rental assistance	60
Units provided in permanent housing facilities developed, leased, or operated with HOPWA funds	8
Units provided in transitional short-term housing facilities developed, leased, or operated with HOPWA funds	
<b>Total</b>	<b>68</b>



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# Barriers to affordable housing (AP-75)

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## Introduction:

Market forces put severe pressure on the number of affordable units available for low income families and individuals. In addition, many local policies, such as land use decisions, fees, and growth restrictions further limit where and how many affordable units can be built. Barriers to affordable housing are also created by legislative decisions including limitations placed on how state and federal money can be used.

**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**

Oregon's 2016-2020 Analysis of Impediments to Fair Housing Choice (AI) identified various impediments and barriers experienced to fair housing choice, and suggested actions to address those impediments. Based on the AI, Oregon developed a 2016-2020 Fair Housing Action Plan (FHAP); prioritizing strategies to remove barriers to fair housing choice. Included in the plan are the following actions that specifically address public policies, land use controls, zoning ordinances, and policies affecting the return on residential investment.

- Fund a pilot program to review Comprehensive Plans submitted to the Department of Land and Conservation Development (DLCD) to identify land use proposals with a potentially discriminatory impact.
- Conduct on-going education and outreach communication with non-entitlement area land use jurisdiction policy-making bodies focusing on best practices, model codes and plans, recent legal decisions and tools available for aiding in creating inclusive communities.
- Fund pilot program, along with OHCS, to review Post Acknowledgement Plan Amendments submitted to Department of Land Conservation and Development (DLCD) to identify land use proposals with potentially discriminatory impact.
- Work with DLCD to examine Oregon's land use laws and planning and zoning systems and seeks ways to help local jurisdictions meet statutory housing obligations.

The 2016-2020 FHAP is included as Section VIII of the AI, and may be accessed at the following link: <http://www.oregon.gov/ohcs/DO/docs/2016-2020-Oregon-Analysis-of-Impediments-Fair-Housing-Choice-Report.pdf>

In 2018, HB 4010 created a Task Force to look at racial disparities in home ownership. In Oregon 67% of non-hispanic white households own their homes while 37% Latino and 34% of

black households are homeowners. OHCS is a participant of this Task Force which will convene through 2019 with the hope of providing recommendations on how these disparities can be bridged.

*Breaking New Ground: Oregon's Statewide Housing Plan*, released in early 2019 lists Affordable Rental Housing and Homeownership as two of the six priorities established by OHCS within the 5 year plan. Barrier reduction to achieve the goals established within these priorities will be of significant importance in the accomplishment of these goals and priorities.

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## Other Actions (AP-85)

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### Introduction

This section describes the actions, and strategies, Oregon plans to take in 2019 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.

### **Describe actions planned to address obstacles to meeting underserved needs.**

The research performed for the Statewide Housing Plan and the Analysis of Impediments to Fair Housing Choice (AI) has shown housing inequities and disparities most often are experienced by people of color and people with disabilities. Households of color are more likely than white households to have lower incomes, and are disproportionately represented in the number of low income households with housing instability. Additionally, Oregon's population is quickly aging, and the population of people with disabilities continues to grow. More accessible units are needed to allow seniors and people with disabilities to live independently.

Oregon Housing and Community Services (OHCS) will work to promote fair housing and access to housing choice for all Oregonians, and take meaningful action to overcome patterns of segregation and promote inclusive communities free of barriers to opportunity. OHCS, in partnership with OHA and Business Oregon developed a Fair Housing Action Plan (FHAP), which is targeted to improve and address these barriers.

### **Describe 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 and federal funds decrease or remain stagnant while construction costs rise. In 2017, the Oregon Legislature passed HB 2002, which supports the agency's work to prioritize preservation and better monitor the inventory of public supported housing. The 2019 Legislature is considering additional action with HB 2002 designed to strengthen the impact and reach of preservation activities.

Other actions by the legislature in the 2017 and 2018 sessions supported investments in affordable housing. The legislature created a revolving loan program to allow housing developers to purchase and hold land for future development, restored a mitigation fund that covers a portion of landlords expenses for future development, investments for housing for people with mental illness, expanded the document recording fee to create more resources for affordable housing (including a veteran set aside) and first time home buyer opportunities,

more resources for homeless shelters, incentivized contractors to work on affordable housing projects in rural Oregon, extended and fixed tax credits that apply to affordable housing, and improved compliance. Importantly, HJR 201A referred a constitutional amendment to the Oregon voters to give local governments the feasibility to leverage obligation bonds for affordable housing with other funding sources.

In 2015 the Oregon Legislature created the Local Innovation and Fast Track Housing program in an attempt to curb the rising proliferation of homelessness on Oregon. This program was initially funded with \$40 million dollars and was specified to serve historically underserved populations, specifically rural areas of Oregon and communities of color. In 2017 this program received \$80 million dollars and there is current 2019 legislation that, if approved, would provide \$130 million dollars to build affordable housing under this program.

The Document Recording Fee expansion, 2018, is significant in that it is expected to raise an additional \$90 million for affordable housing, emergency and veteran's services and to establish first-time buyer's savings accounts. Portions of these dollars are earmarked for capacity building. OHCS plans to utilize these capacity building funds to break down barriers specific to rural areas to allow for much needed development which too often is not taking place due to capacity related issues. OHCS also plans to provide a menu of other capacity building services for both rural and urban areas to preserve current affordable housing and increase affordable housing production.

A task force to address racial disparities in homeownership was established 2018 and will work over a 12 month period to determine why this disparity exists and how it may be mitigated. Additionally, HB 5201A included a general fund appropriation of \$5.2 million for emergency winter housing and shelter. All of these efforts will support the efforts of our agency to foster and maintain affordable housing and access to emergency shelters.

Oregon Housing and Community Services' (OHCS) 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.

Oregon Housing and Community Services (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 federal and state resources, and are also allocated for rental assistance administered by Community Action Agencies. 2018 was the third year that OHCS received an HTF allocation. OHCS administers the HTF program similarly to the HOME program. The goal is to create new, or preserve existing affordable housing resources that are sustainable, address the needs, and have an impact on the residents. Oregon 2019 HTF funding is used specifically for families at or below 30% of the area median income of the federal poverty line (whichever is greater). Funding is often paired with the Low Income Housing Tax Credit (LIHTC) program or other federal or state resources.

Oregon Housing and Community Services (OHCS) provides federal and state tax credits and other available gap financing to affordable housing developers, administering the federal LIHTC program, a major funding source for development of affordable housing. Tax credit equity is leveraged with other state and federal funds through the competitive NOFA process, allowing one application for all resources available through the NOFA. The 9% LIHTC NOFA includes other state resources such as the Oregon Affordable Housing Tax Credit, Low Income Weatherization funds, HTF and a portion of the HOME funds in the balance of state.

Oregon Housing and Community Services also administers the non-competitive 4% tax credits used in conjunction with tax-exempt bonds. In 2018 4% tax credits were used in conjunction with federal preservation dollars to fund PHA RAD and/or Section 18 conversions amongst other affordable housing construction and preservation uses.

Oregon Housing & Community Services continues to explore and support innovative ways to build and preserve manufacture homes. Several bills have been presented in the 2019 legislature to foster these preservation efforts in particular. OHCS welcomes these efforts and continues to work towards preserving this precious resource of affordable housing.

Oregon Housing and Community Services (OHCS) will work with the **Agricultural Workforce Housing Facilitation Team (AWHFT) Emergency Housing Assistance program (EHA) Workgroup** to utilize the EHA Discretionary Set Aside fund to develop an Oregon Agriculture Workforce Housing Study. The Housing Stability Council previously raised awareness of the need for a study that includes updated statewide information on current agriculture workforce housing. This study will serve as the framework for future funding and program decisions and could include basic population data, best practices, system changes/alignment, equitable access and new innovations. This study is currently under contract.

#### **Describe actions planned to reduce lead-based paint hazards.**

Oregon Housing and Community Services (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

Oregon Housing and Community Services' (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 an assessment for LBP hazards per Subpart M of 24 CFR part 35 as part of the housing standards inspection prior to rental of units built prior to 1978 if the household includes a child under age six.

Business Oregon 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 have opportunities to continue LBP education by attending HUD sponsored trainings on healthy homes, LBP rules, repairs, and technical assistance.

**Describe actions planned to reduce the number of poverty level families.**

Oregon Housing and Community Services, in partnership with the Community Action Partnership of Oregon (CAPO), prepared Oregon's 2015 Report on Poverty. The report is a comprehensive look at the national, state, and county poverty rates, characteristics of people living in poverty, household incomes, the number of homeless people, and households in the state. The report shows us that Oregon's poverty rate of 16.2 percent remains above the national poverty rate of 15.4 percent, with rural counties being the hardest hit, facing poverty rates over 20 percent. Oregon will use this report to help understand where needs exist as we implement the state's Strategic Plan. You may access the report; *Moving from Poverty to Prosperity in Oregon*, at the following link: <http://www.oregon.gov/ohcs/pdfs/2015-Report-on-Poverty.pdf>. OHCS has begun development of the 2019 Oregon Poverty Report. We've reached out to our partners across the state by providing them with demographics for their service areas and asking for their help to inform the narrative of the report. Our goal is to report holistically what poverty looks like in Oregon.

The Oregon Individual Development Account (IDA) Initiative was created to bring state agencies, private non-profit and tribal partners, and private contributors together to create opportunities for low income Oregonians. Partners include the State of Oregon, under the leadership of Oregon Housing and Community Services Department, the Oregon Department of Revenue, and a host of private partners and sponsors working together to help Oregonians achieve their dreams. The Initiative is managed by a statewide 501(c)3 organization, Neighborhood Partnerships. The initiative is 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. 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 **LIFT Housing Program's** purpose is to build new affordable housing for families with children who are experiencing, or at-risk of homelessness. In 2015 and again in 2017, the Oregon Legislature committed new revenue generated from general obligation bonds to the program.

Oregon Housing and Community Services partners with the Department of Human Services to use Temporary assistance for Needy Families (TANF) funds to address crisis and short-term needs that put low-income families with children at risk of becoming homeless. Efforts continue to strengthen and expand this program as well as replicate similar partnerships with other state departments.

### **Describe 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 will work to enhance coordination and implementation in 2019:

OHCS is coordinating with Oregon Health Authority and the Oregon Human Services Department to provide Permanent Supportive Housing support across Oregon. In addition to utilizing existing resources, OHCS has recently received 50 million dollars for exclusive use towards Permanent Supportive Housing (PSH). To support these new development resources, OHCS is developing a technical assistance workshop that will train teams across the state to put together a comprehensive PSH package that will include services and rent assistance.

OHCS is also working with communities who have passed local initiatives to develop affordable housing including Permanent Supportive Housing.

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. Oregon Housing and Community Services partners with DHS in this effort. OHCS contracts with local CAAs to deliver services to TANF recipients and TANF-eligible recipients. CAAs develop collaboration plans with their local DHS district offices to develop a referral process, provide services and develop case management plans designed to assist these recipients in achieving housing stability. Collaborative efforts include weekly, bi-weekly and monthly joint meetings in which recipient cases are reviewed and action plans are developed. Through these partnerships, low-income families with children homeless or at risk of homelessness are able to obtain rental assistance, services and referral to other community resources that help them achieve housing stability and support their efforts to become self-sufficient.

### **Describe actions planned to enhance coordination between public and private housing and social service agencies.**

Oregon Housing and Community Services 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). Community Action Agencies 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 (CoCs), which enables them to be a community hub for linking low-income people to mainstream supportive services. Community Action Agencies maintain partnerships with systems of care to ensure coordination, and to avoid duplication of services.

Oregon Continuums of Care are designing and implementing a 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.

To enhance coordination between public and private housing and social service agencies, in 2015, the Oregon Legislature approved an expansion of the Housing Council to become the Oregon Housing Stability Council and include additional members. 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.

OHCS' opportunity to expand the ESG CV 2 applicant pool to include other eligible ESG applicants will enhance coordination and collaboration between public and private housing and social service agencies. Key criteria will include collaboration between partner agencies in the homeless services system. By increasing the pool of applicants and encouraging collaboration, ESG CV 2 funding will strengthen the connection across the different networks meeting the wide array of services provided by public and private housing and social service agencies.



## Program Specific Requirements (AP-90)

The following section addresses program-specific requirements for the programs included in the Annual Action Plan.

### Community Development Block Grant Program (CDBG)

Projects planned with all CDBG funds expected to be available during the 2019 program year are identified in the Projects Table below. 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 (2018-2020).

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.

Table 11- Use of CDBG Funds

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% 2018-2020

## Home Investment Partnership Program (HOME)

### **A description of other forms of investment being used beyond those identified in Section 92.205 is as follows:**

Oregon Housing and Community Services 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.

### **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:**

Oregon Housing and Community Services does not operate a HOME funded homebuyer program.

### **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:**

Oregon Housing and Community Services does not operate a HOME funded homebuyer program.

### **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:**

Oregon Housing and Community Services does not use HOME funding to refinance existing debt.

## **Housing Trust Fund (HTF)**

Additional information about the criteria related to the HTF program may be found in the HOME Investment Partnership Program NOFA, the Housing Trust Manual, and the OHCS Project Development Manuals (PDM) located on the [OHCS website](#) under Related Links.

**1. How will the grantee distribute its HTF funds?**

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.**

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).**

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.**

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.**

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).**

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.**

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.**

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.**

The 2019 HTF Allocation Plan discusses the Program Specific Requirements of the Housing Trust Fund as follows:

**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.
    - d. Developer Fee is within the OHCS maximum allowable.
    - e. If Uniform Relocation Act (URA), the budget line item accurately reflects the Project cost based on the sufficient Relocation Plan.
    - f. 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).**

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.**

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; often times 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?**

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?**

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.

2019 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
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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.**

Housing Trust Fund assisted housing is required to meet OHCS design and construction standards as defined in the [OHCS Project 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 will not use HTF funds to assist first-time homebuyers, enter “N/A”.

N/A

**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.

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.

Requests for funds to buy-down or refinance current debt are not eligible for OHCS HTF funding.

### **Emergency Solutions Grant (ESG)**

#### **Include written standards for providing ESG assistance**

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 Operations Manual](#).

For ESG-CV, subgrantees must follow existing written standards except for provisions of the written standards that have been temporarily waived or relaxed by HUD. OHCS has adopted

the rule and regulation revisions offered by HUD to enable subgrantees to respond immediately to households' needs and also to protect subgrantee staff from COVID-19 exposure. Subgrantees must provide OHCS with revised standards developed either by the subgrantee or their continuum of care.

**If the Continuum of Care has established centralized or coordinated assessment system that meets HUD requirements, describe that centralized or coordinated assessment system.**

Oregon is not a collaborative applicant for any of its CoCs, but does provide funding and support to assist with the development of the HUD required centralized or coordinated assessment system, performance measures, and other required activities. Each of the eight state continuums either has their coordinated assessment system in place, or is in the process of developing their system. OHCS is reviewing subrecipients' progress with development of robust coordinated entry systems and will offer technical assistance if needed to assist subrecipients to expand and enhance their current systems.

The following Coordinated Entry plans are in effect but may be revised by continuums as they determine how to best serve households affected health-wise or economically by the COVID-19 pandemic.

**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.

### **Mid-Willamette Valley Homeless Alliance (OR-504)**

The 504 coordinated assessment uses a single agency as its access point offering phone or in person assessments in multiple languages. Assessments can be requested by any agency that operates in the geographical area and are offered by outreach teams as they work with the unsheltered. The COC uses the information gathered to guide their Built for Zero case conferencing, placement in emergency shelter, and to fill housing opportunities that become available including Salem Housing Authority project based voucher program, Redwood Crossings. The data gathered during the assessment is used by the community to assess service gaps, address equity, and guide local policy.

### **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.

### **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).

### **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.

Update (10/20): A portion of ESG-CV2 funds will be awarded through a competitive process outside of the Master Grant Agreement.

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 work plans 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. 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.

Update: To allocate ESG-CV 2 funds, OHCS sought and received flexibility in [HB 4304](#) around [allocating phase II of CARES Act Emergency Solution Grants \(ESG\)](#). OHCS will provide \$7 million to our Community Action Agency partners utilizing an updated formula to account for the current crisis. For the remaining funds, OHCS will develop a competitive process. OHCS will release a request for application and fund applicants based on their submissions. The RFP process will allow non-profit service agencies that are outside the CAA network the opportunity to apply for funds.

### **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 Opportunities for People with HIV/AIDS (HOPWA)**

The following question 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.

# ATTACHMENTS

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- A Certification(s).....
- B Standard Form 424.....
- C Citizen Participation Comments.....
- D CDBG 2018 Method of Distribution (MOD) .....

# ATTACHMENT A

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Reserved for HUD Certifications.

# ATTACHMENT B

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Reserved for HUD Form 424.

# ATTACHMENT C

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Reserved for Citizen Participation Comments.

# ATTACHMENT D

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Reserved for the Business Oregon – Community Development Block Grant, 2019 Method of Distribution.