

Housing Recovery Services Program Policy Manual

February 2025



Got Questions?

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Version History and Version Policy

The version history of the policy manual is tracked in the table below, with notes for each change. The dates of each publication are also tracked in the table.

Oregon Housing and Community Services (OHCS) will publish a new version after making substantive changes that reflect a policy change. The updated policy manual will be assigned a new primary version number such as 2.0, 3.0, etc.

After making non-substantial changes, such as minor wording and editing or clarification of existing policy that does not affect the interpretation or applicability of the policy, OHCS will publish a version of the document with a sequential number increase behind the primary version number such as 2.1, 2.2, etc.

Amendments made to policy may go into effect on the date of the revision or may be applied retroactively, depending on the applicant pipeline and status of applicants in the program intake and recovery process. Whether a policy will be applied proactively or retroactively will be detailed in the version history below and/or within the relevant program sections.

Version Number	Date Revised	Key Revisions
0.1	12/12/2023	Initial draft submitted to HUD and ODHS
1.0	03/04/2024	First version published incorporating HUD and OHDS clarification requests (retroactively applied to effective date of OHCS-ODHS contract)
2.0	2/26/2025	Second version published to incorporate Housing Navigation Services to Disaster Case Management policy

Purpose and Overview of the Program



1 Purpose and Overview of the Program

1.1 Use of This Document

This document is a high-level policy manual created by Oregon Housing and Community Services (OHCS) for its subrecipients to understand the requirements that must be followed in the administration of Housing Recovery Services that are funded by Community Development Block Grant Disaster Recovery (CDBG-DR) from the U.S. Department of Housing and Urban Development (HUD). This manual is intended to highlight the key areas of compliance for OHCS subrecipients; however, these funds are subject to all applicable rules, regulations, waivers, and requirements, including those in [87 FR 6364](#) and the state's CDBG-DR Public Action Plan, as amended. Therefore, this manual and compliance requirements may need to be updated over the life of the program.

OHCS expects its subrecipients to maintain their own program policies and procedures, or to adopt this manual for use, for OHCS subrecipients to follow to ensure compliance with all requirements herein.

1.2 Program Authorization

The Housing Recovery Service program is funded through HUD's CDBG-DR program, as appropriated by Congress in response to the 2020 Labor Day wildfires and straight-line winds (DR-4562 or disaster). Assistance for the 2020 Labor Day Disasters was appropriated on Oct. 29, 2021, by the Extending Government Funding and Delivering Emergency Assistance Act of 2021, the Disaster Relief Supplemental Appropriations Act of 2022, and any applicable future allocations. CDBG-DR grants are authorized under Title I of the Housing and Community Development Act of 1974 (HCDA) for necessary expenses related to disaster relief, long-term recovery, restoration of infrastructure and housing, economic revitalization, and mitigation in the most impacted and distressed (MID) areas resulting from a major disaster. [HUD](#) maintains all [federal rules, regulations, and documents](#) related to the CDBG-DR allocation to Oregon.

1.3 Program Summary

Oregon's CDBG-DR Public Action Plan ("the Plan") provides funding for public services eligible under CDBG-DR funds, allocated as a public service program: Housing and Recovery Services.

Housing and Recovery Services provides for two activities: disaster case management and housing navigation. Disaster case managers (DCMs) and housing navigators will help impacted residents, vulnerable populations, and members of underserved communities in MID areas expedite their recovery by providing various forms of outreach, support, and counseling to help survivors navigate and address unmet needs. Housing and Recovery Services will provide survivors with a support person to facilitate access to a broad range of resources.

Services provided under Housing and Recovery Services will promote (a) the effective delivery of post-disaster case management and housing navigation services, (b) partner integration, (c) provider capacity building, and (d) state-level program development. The program provides social and technical assistance to ensure a whole community approach to provide or connect local services to disaster survivors.

1.4 Program Allocation and Eligible Uses of Funds

The total program allocation for Housing Recovery Services is \$6,017,576. Funds are limited to expenses reasonably and necessarily incurred in performing the activities required within this policy necessary to carry out the Housing Recovery Service program.

1.5 Method of Distribution

The provision of Housing Recovery Services may be carried out by the state directly and/or by subrecipients. The following provides for the method of distribution for the Housing Recovery Service program as provided for by the Action Plan.

1.5.1 Housing and Recovery Services

In accordance with the Action Plan, as amended, OHCS may implement its Housing and Recovery Services program directly and/or through subrecipients. While OHCS intends to mainly enter into agreements with subrecipients, there may be regions or communities in the disaster-impacted areas where services may be available only through the state. Eligible subrecipients may include qualified counties and units of general local government, homeownership centers, culturally specific or community-based organizations (CBOs), long-term recovery groups, and/or other nonprofit organizations qualified to provide housing or financial counseling services to applicants.

There are two distinct activities under Housing Recovery Service: disaster case management and housing navigation.

1.5.1.1 Disaster Case Management

OHCS has allocated funding from the Housing and Recovery Services program to the Oregon Department of Human Services (ODHS) through an interagency agreement based on a projection of continued need through June 2025.

ODHS has preexisting contracts with CBOs that are serving as subrecipients responsible for administering Disaster Case Management in the disaster-impacted areas. This Disaster Case Management work is a continuation of already established long-term case management services.

Eligible subrecipients include:

- Clackamas: ODHS-Office of Resilience and Emergency Management (OREM)
- Douglas: Glide Revitalization
- Jackson: Rogue Food Unites (RFU)
- Klamath: RFU/ODHS-OREM
- Lane: Cascade Pacific (fiscal agent for McKenzie Valley Long Term Recovery Group)
- Lincoln: ODHS-OREM
- Linn: Santiam Service Integration Team (SIT)
- Marion: SIT

Before adding additional subrecipients and/or procuring additional case management services support, ODHS must request preapproval from OHCS. ODHS will be required to demonstrate how additional case management services align with the intent of the program and that they fall within the overall program budget. ODHS will also be required to demonstrate that these funds are not supplanting other state or federal funds and provide a clear plan for exiting program participants from the additional services at the end of the program. Under no circumstances may ODHS or their subrecipients provide direct financial assistance to survivors.

1.5.1.2 Housing Navigation Services

OHCS may provide grants to units of general local government qualified to provide housing or financial counseling services to applicants.

1.6 Roles and Responsibilities

1.6.1 OHCS Responsibilities

OHCS is responsible for:

- Complying with all applicable state and federal requirements contained in this document and within any applicable subrecipient agreements (SRAs), interagency agreements, and any other contractual arrangements between OHCS and their subrecipients
- Providing information to subrecipients on:
 - ReOregon policies and procedures relevant to the public services provided under this policy
 - ReOregon program rules and eligibility criteria to enable subrecipients to provide appropriate referrals for the Housing Recovery Service program
- Meeting all HUD reporting requirements, including the compiling, preparing, and submitting of any and all reports
- Meeting with its subrecipients at least quarterly, or as needed, to coordinate efforts on program implementation for the purpose of promoting the success of OHCS' ReOregon program(s)
- Providing technical assistance to subrecipient staff on ReOregon program implementation, including compliance with HUD CDBG-DR rules, statutes, and regulations
- Monitoring subrecipients for program compliance

1.6.2 Subrecipient Responsibilities

OHCS subrecipients are responsible for implementing Housing Recovery Service as follows:

- Comply with all applicable state and federal requirements contained in this document, SRAs, and any interagency agreements or other contractual documents.
- Assess, classify, and document survivors' recovery needs and accept eligible fire-impacted survivors in the wildfire-impacted communities of Clackamas, Douglas, Jackson, Klamath, Lane, Linn, Lincoln, and Marion counties. All Housing Recovery Service services must be within the bounds of the applicable programs provided for under the public services section of the Public Action Plan, as amended. Subrecipients must ensure that at least 51% of program beneficiaries qualify as low- or moderate-income (LMI) (defined as having gross household

income no greater than 80% of area median income (AMI) as published by HUD for the relevant county) individuals.

- Identify potential beneficiaries for ReOregon programs and inform them of the opportunity to apply.
- Attempt to contact survivors who may be eligible for ReOregon to: (1) conduct pre-screening for ReOregon eligibility and (2) seek permission from survivors to share information with program partners, such as OHCS grantees and contractors, for the purpose of assisting survivors with ReOregon applications.
- Establish and manage agreements with sub-grantees to provide housing recovery services. All agreements must comply with HUD requirements.
- Complete and submit a monthly report by the 15th of each month for the previous month, or in accordance with reporting requirements detailed in the SRA. The report must be submitted in the form with the content specified and required by OHCS. OHCS will notify subrecipients in writing of the guidelines and requirements applicable to the submission of reports.
- Meet with OHCS at least quarterly, or as either party may need, to coordinate
- efforts on program implementation for the purpose of promoting the success of
- OHCS' ReOregon program.
- Comply with all applicable HUD and CDBG-DR rules, regulations, and statutes,
- including documenting National Objective (Urgent Need or LMI) for each recipient of housing recovery services. Such documentation must be provided to OHCS or HUD, as those entities may request, within 10 business days of a request.
- Ensure that all expenditures funded are eligible activities under OHCS' Action Plan and these program guidelines.
- Ensure that all grants, contracts, and other agreements made with funding from
- this agreement include appropriate language requiring compliance with all
- applicable HUD and CDBG-DR rules, regulations, and statutes.
- Monitor sub-grantees, if applicable, for program compliance.

CDBG-DR



and OHCS

Requirements

2 CDBG-DR and OHCS Requirements

2.1 Geographic Eligibility

OHCS and its subrecipients must use funds to benefit participants (or beneficiaries) impacted by the disaster in the HUD- and grantee-identified MIDs and who have not achieved a permanent housing solution.

- HUD-identified MID counties: Clackamas, Douglas, Jackson, Lane, Lincoln, Linn, and Marion
- Grantee-identified MID counties: Klamath

2.2 Eligible Applicants

Eligible applicants of the Housing Recovery Service program include all survivors of the 2020 Labor Day Disasters, regardless of whether they registered with the Federal Emergency Management Agency (FEMA).

2.3 National Objective

Assistance provided under the Housing Recovery Services program will meet the national objective of benefiting LMI persons, limited clientele. To meet this national objective, OHCS and/or its subrecipients must ensure that at least 51% of program beneficiaries qualify as LMI (defined as having gross household income no greater than 80% of AMI as published by HUD for the relevant county).

OHCS must ensure this requirement is met through monitoring and regular beneficiary reviews. Subrecipients must submit OHCS-required reports, in accordance with Section 1.6.2, that break out beneficiaries per HUD requirements using the following income ranges and categories:

- 0%–30% AMI: Extremely Low
- 31%–50% AMI: Very Low
- 51%–80% AMI: Low
- Greater than 80% AMI: Non-LMI (does not contribute to the 51% requirement)

2.4 CDBG-DR Eligible Activities

The services provided under the Housing Recovery Services program are allowed under HCDA Section 105(a)8.

Eligible expenses and activities include those actual, necessary, and reasonable costs related to performing Housing Recovery Service services and delivering goods required, subject to all eligible and ineligible activities listed at 2 CFR 200 and 24 CFR Part 570.

OHCS and/or its subrecipients must include in their policies and SRAs specific eligible activities that may be paid for under Housing Recovery Service activities detailed in the manual, as provided in the Public Action Plan, as amended.

2.4.1 Public Service: New or Expanded Activity

The purpose of the CDBG-DR Housing Recovery Services program is to provide expanded or extended services to survivors affected by and continuing to recover from the 2020 Labor Day wildfires and straight-line winds. OHCS has recognized the importance of providing ongoing support to the individuals and households displaced during the fires that continue to be without permanent housing and face evolving and changing recovery and housing support needs that, for many, look very different than they did at the beginning of their recovery.

Since the end of the FEMA-funded Disaster Case Management Program (DCMP), ODHS was able to identify state funding to extend that program and continue managing the DCM effort, utilizing both ODHS employees and ODHS-funded positions at CBOs. The funding provided under this agreement does not supplant any other available funding, as all state and FEMA funds for this purpose have been exhausted. The continued operations of DCM are critical to ensure that other non-housing barriers do not prevent ReOregon beneficiaries and other fire-impacted households from completing their recovery.

2.4.1.1 Housing and Recovery Services Eligible Activities

OHCS may provide grants to subrecipients that may include the following types of services in accordance with HCDA, Sections 105(a)8, 15, and 19; applicable waivers identified in the Allocation Announcement Notice and Consolidated Notice (87 FR 6364); and other applicable waivers or alternative requirements:

- Performing outreach and engagement to understand impacted participants' unmet needs
- Assessing housing needs and financial resources, and addressing other concerns about short- and long-term housing
- Discussing unique assistance needs and the resources available
- Connecting with state and local recovery resources
- Communicating with lenders, insurance companies, and government agencies

- Supporting application intake and assisting with the necessary paperwork for recovery programs
- Reviewing income, expenses, credits and debts, and helping to develop ways to improve a participant's financial situation
- Creating a personalized action plan
- Providing other housing navigation services
- Providing financial counseling services to owners of small rental properties who will rent housing at affordable rates to income-qualified tenants

2.4.1.2 Disaster Case Management Specific Activities

Disaster Case Management is a time-limited program that involves a partnership between a case manager and a disaster survivor to assess and address that a survivor's verified disaster caused unmet needs through the development of a Disaster Recovery Plan.

The Disaster Recovery Plan includes resources, decision-making priorities, guidance, and tools to assist disaster survivors. Disaster Case Management services include a range of social and technical assistance services to support survivors in multiple areas of recovery, including referrals to other programs and providers that offer mental/behavioral health, trauma, financial recovery, and other supports. In addition, Disaster Case Management may help survivors pull together information or documentation required to be referred to or participate in other programs but will not have a role in determining program eligibility or award amounts for other programs. Subrecipients shall also conduct demobilization, as appropriate based on case status, as survivors are determined to no longer require Disaster Case Management services.

2.4.1.3 Housing Navigation Specific Activities

Housing Navigation services provide comprehensive housing navigation to help disaster survivors overcome barriers to accessing recovery resources and sustain affordable housing beyond the life of the CDBG-DR assistance. Specific activities include, but are not limited to:

- Creating a comprehensive list of survivors who are not permanently and/or safely housed to identify and assist remaining disaster survivors and their unmet needs
- Helping disaster survivors create a plan for permanent housing by helping them understand needs, challenges, barriers, and opportunities for permanent housing
- Referring disaster survivors to appropriate housing and working with agencies that provide wildfire-specific housing on outreach efforts for available housing units for survivors

- Locating and accessing financial resources for application fees, move-in expenses, or shortages on manufactured home purchases
- Providing support for ReOregon's Homeowner Assistance and Reconstruction Program (HARP) and Affordable Housing Development (AHD) program applications to provide needed assistance beyond available outreach and intake
- Assisting with the remaining cleanup of properties in preparation for rehabilitation or reconstruction
- Coordinating with planning departments so that survivors understand the process for rebuilding and permitting to ensure compliance with building code requirements and other required construction standards
- Carrying out resiliency efforts, such as work on defensible space resources to clear remaining dead/downed debris that is now a fire hazard
- Carrying out any additional housing navigation activities required to provide comprehensive housing navigation, case management, and county-wide coordination on wildfire recovery activities directly tied to housing

2.5 Equity and Racial Justice

OHCS is committed to advancing equity and racial justice through Housing Recovery Services program. Disaster-impacted households are facing monumental challenges and are making life-changing decisions related to housing and household finances. Due to financial pressures, insufficient insurance, confusing application processes, lack of affordable housing, and other circumstances, many households are forced to make quick decisions, even as they are reeling from the shock, confusion, and long recovery process that accompanies a disaster. These decisions can have long-term consequences, particularly for those impacted residents with access to the fewest resources and Oregon's most vulnerable populations. One way of achieving this commitment and goal is to remove as many barriers and unnecessary steps as possible for low-income individuals and households, Latino/Latina/Latine individuals and households, individuals living with disabilities, single parents, people of color, and other protected classes who have faced historic discrimination or limited access to recovery resources.

Within their policies and procedures, OHCS subrecipients are required to describe and document how its services reduce or remove barriers and promote equity in recovery for vulnerable populations and underserved communities. In addition, as part of HUD reporting requirements, subrecipients are required to report on the race and ethnicity of all beneficiaries supported through the activities carried out under the Housing Recovery Services program.

2.6 Title VI Notice, Section 504, Civil Rights Act, Fair Housing, and Accommodating Persons With Limited English Proficiency

2.6.1 Title VI

OHCS, agencies, subrecipients, contractors, and subcontractors who receive federal or state financial assistance for their programs and services must comply with Title VI of the Civil Rights Act of 1964, 42 U.S.C. 2000(d) et seq.; Executive Order 13166; and the U.S. Department of Labor Revised Guidance Regarding the Title VI Prohibition Against National Origin Discrimination Affecting Limited English Proficient Persons.

2.6.2 Section 504 and Civil Rights

Section 504 of the Rehabilitation Act of 1973, the Americans with Disabilities Act of 1990, and related federal and state laws and regulations forbid discrimination against those who require accommodation to access facilities, services, and programs. Furthermore, these laws require subrecipients to take affirmative steps to reasonably accommodate ADA-qualified individuals and ensure that their needs are equitably represented in programs, services, and activities, including in disaster recovery, resiliency, and mitigation.

2.6.3 Fair Housing Act

The Fair Housing Act requires all agencies and subrecipients funded in whole or in part with HUD financial assistance to certify that no person was excluded from participation in, denied the benefit of, or subjected to discrimination in any housing program or activity because of their age, race, color, creed, religion, familial status, national origin, sexual orientation, military status, sex, disability, or marital status. OHCS subrecipients must include in their Housing Recovery Services policies how they will:

- Comply with and enforce the civil rights requirements of Title I of the HCDA and the Fair Housing Law.
- Follow policies and procedures for compliance with Affirmatively Furthering Fair Housing (AFFH), including an assessment of the demographics of the impacted residents, socioeconomic characteristics, environmental hazards or concerns, and other factors material to the AFFH determination.
- Prioritize supports to protected classes or individuals challenged in achieving eligibility or realizing benefits.

2.6.4 Accommodating Persons With Limited English Proficiency

Subrecipients must adopt and describe in their policies how they will follow [OHCS' CDBG-DR language access plan](#), or subrecipients can develop their own plan to ensure that individuals with limited English proficiency (LEP) receive the language assistance they need to participate in Disaster Case Management Plan. This can include:

- Translation of vital documents into Spanish
- Language Line services
- Language Bank
- "I Speak" cards for individuals whose first language is not English
- Bilingual DCMs
- LEP outreach and engagement

2.7 Applicant Outreach, Engagement, Intake, Support, and Closeout Processes

Subrecipients are required to include policies and procedures that detail any outreach and engagement steps or requirements taken to engage survivors who have not recovered, how survivors may apply for support services, limitations and requirements for receiving services, and exit or closeout processes for survivors receiving services as listed herein. OHCS may require subrecipients to submit outreach plans for approval and participate in training on outreach methods.

2.8 Duplication of Benefits

Section 312 of the Stafford Act prohibits any person, business, or other entity from receiving duplicative financial assistance for the same disaster recovery purpose from multiple sources of federal and other support (42 U.S.C. 5155(a) and (c)). Duplication occurs when an entity receives assistance from multiple sources for a cumulative amount that exceeds the total need for a particular disaster recovery purpose. The amount of the duplication is the amount of assistance provided in excess of need.

Subrecipients are required to include policies and procedures for ensuring that no duplication of benefit occurs for subrecipients and/or beneficiaries receiving services under the programs listed herein.

2.9 Appeals, Grievances, and Section 504 Complaints and Grievances

Subrecipients are required to have a written process for addressing applicant grievances for decisions, including the termination, reduction, or denial of services or other grievances. At a minimum, the process must include the following components.

2.9.1 Program Appeals

Subrecipients must describe the appeals process for applicants or participants to appeal decisions made by OHCS or its subrecipients.

2.9.2 Program Complaints

Subrecipients must keep a record of each complaint received. Upon receipt of the complaint, staff must log the complaint and respond to the complainant within 15 business days where practicable.

2.9.3 Section 504 Complaints and Grievances

Section 504 prohibits discrimination on the basis of disability in programs receiving federal financial assistance, in federal employment, and in the employment practices of federal contractors. Each subrecipient must designate a Section 504 coordinator, publish their contact information, and include a process for filing a grievance, such as:

- Applicants may file grievances alleging Section 504 violation in writing with the program within 180 calendar days of the alleged violation. Grievances must contain detailed information to allow an investigation, including:
 - Alleged violation date, location, and description of the problem
 - Applicant name, address, telephone number, and applicant ID, if applicable
- Once a grievance is received, the subrecipient will contact the applicant within three to five business days, by phone or in writing, to acknowledge receipt of the grievance and arrange for the Section 504 Coordinator to meet with the complainant to discuss the grievance and possible resolution. Within 15 business days after the meeting, the Section 504 Coordinator will respond in writing. The response shall be in a format accessible to the complainant (such as large print or audiotape). The response will explain the position of the subrecipient and offer options for resolving the grievance.

2.9.4 Complaints of Fraud, Waste, or Abuse

Complaints alleging the violation of fair housing laws will be directed to HUD for immediate review. Complaints regarding fraud, waste, or abuse of government funds should be forwarded to the HUD Office of the Inspector General Fraud Hotline (phone 800-347-3735 or email hotline@hudoig.gov). Subrecipients will make available to OHCS detailed fraud, waste, and abuse policies and procedures to demonstrate that adequate procedures are in place to prevent fraud, waste, and abuse.

2.10 Data Sharing and Referrals to Other Recovery or Assistance Programs

OHCS will establish processes and data sharing agreements with county and local subrecipients, CBOs, long-term recovery groups, public housing authorities, and other providers for referring participants to services and/or supports for which they may qualify.

OHCS and its subrecipients will develop a process and data sharing processes for referring program participants to ReOregon or other state recovery programs managed by OHCS. Subrecipients may refer to the ReOregon Survivor Support Staff: Roles and Responsibilities table, which is available on the [ReOregon website](#). The chart is a helpful reference guide for subrecipients to further understand specific roles and responsibilities for engagement partners for ReOregon wraparound support services associated with the programs referenced herein.

Subrecipients shall share specific participant personally identifying information (PII) with OHCS, as necessary, to carry out any assistance or service for the benefit of the participant. Subrecipients may disclose this PII to OHCS with an authorized Release of Information from the participant.

2.11 Confidentiality and Personally Identifiable Information

Subrecipients must have policies and procedures to maintain all participant information and records securely and confidentially. Confidential records include applications, records, files, and communications relating to participants.

Subrecipients must have procedures for ensuring confidentiality in the electronic collection of participant information, including:

- Computer terminals must be in a secure location, limiting access only to those persons who have a legitimate interest in and are responsible for participant records.
- Computer monitors must be cleared (or a screen saver activated) immediately after accessing a participant record.
- Computer terminals must be on a “locked” mode or turned off if the terminal is unattended.
- Access to personally identifiable data shall be given to only authorized personnel as necessary for performing the work required for programs funded by CDBG-DR.

PII is protected by federal laws (Privacy Act of 1974, as amended) and will be collected for the purpose of providing assistance/service, reporting, and monitoring. PII can be used to distinguish or trace individual’s identities. Examples of PII include names, addresses, income verification documents, disability status, employment status, etc., which can be linked or is linkable to a specific applicant and/or program applicant. As the subrecipient receives direct applications from applicants requesting assistance, the subrecipient keeps all PII information for the duration of the project in the system of record.

If records containing PII are subject to the Freedom of Information Act or Oregon Public Records Law requests, subrecipients shall release only such records in accordance with state and federal law. The program, including subrecipients, shall store PII records only as long as necessary, in accordance with record retention requirements at 2 CFR Part 200.333 and 24 CFR Part 570.502(a)(7).

2.11.1 File Security

Subrecipients must have adequate procedures in place to collect and process participant-provided information and to handle PII properly and with sufficient protection. Subrecipients will:

- Maintain all records in an electronic format.
- Secure all files to ensure the privacy of all applicant PII located within the files.
- Save electronic files containing PII in password-protected electronic folders.
- Back up files on a routine basis.

Required reports to HUD and/or OHCS may include participant identification numbers or property addresses but will not include unique identifiers such as Social Security numbers, names, dates of birth, etc.

2.12 Equal Employment Opportunity

Executive Order 11246 (EO11246), Equal Employment Opportunity, as amended, prohibits federal contractors and federally assisted construction contractors and subcontractors, who do over \$10,000 in government business in one year from discriminating in employment decisions on the basis of race, color, religion, sex, sexual orientation, gender identity, or national origin. The executive order also requires government contractors to take affirmative action to ensure that equal opportunity is provided in all aspects of their employment. Subrecipients will be required to execute a certification indicating compliance with EO11246.

2.13 Procurement

Subrecipients must follow federal, state, and local procurement standards, including procurement standards set forth at 2 CFR Parts 200.317–200.327. Whenever procurement processes conflict, entities must comply with the more stringent regulation.

2.14 Conflict of Interest

In accordance with 24 CFR Part 570.489(h), 24 CFR Part 570.611, 2 CFR Parts 200.317–318, and 2 CFR Part 200.112, no covered persons (defined as an employee, agent, consultant, officer, or elected official who exercise or have exercised any functions or responsibilities with respect to activities assisted by CDBG-DR, or who are in a position to participate in a decision-making process or gain inside information with regard to such activities), may obtain a financial interest or benefit from an activity assisted by CDBG-DR, or have a financial interest in any contract, subcontract, or agreement with respect to an activity assisted by CDBG-DR, or with respect to the proceeds of the activity assisted by CDBG-DR, either for themselves or those with whom they have business or immediate family ties, during their tenure or for one year thereafter.

Covered persons who have a potential or actual conflict of interest in relation to activities funded in whole or in part with CDBG-DR are required to disclose this potential or actual conflict to OHCS. This policy and requirement must be included in DCMP program policies and procedures.

2.15 Fixed Assets (Personal Property): Reporting, Tracking, and Disposition

If a subrecipient receives funds to purchase equipment or personal property with a life of more than one year and an acquisition cost of \$5,000 or more, they will be required to

manage these assets and to ensure that the assets continue to be used for their intended purposes in accordance with the CDBG-DR regulations and property standards.

Subrecipients must maintain appropriate records of their assets, whether in their possession or in the possession of a sub-awardee organization. Specifically:

For personal property, subrecipients must maintain a fixed assets ledger that includes a description of the property; any identifying information such as a serial number; the funding source (grant number); the acquisition date and cost; the federal share of the cost; the location, use, and condition of the property; and disposition data. Subrecipients are required to conduct a physical inventory of personal property biannually to ensure that the property is being maintained in good condition and that there are procedures in place to prevent loss, damage, or theft of the property.

Prior to disposing any equipment purchased with CDBG-DR funds, subrecipients must request disposition instructions from OHCS.

2.16 Environmental Review

Programs included in this policy manual are exempt from performing environmental reviews according to 24 CFR Part 58.34(a)—per the language below:

§58.34 Exempt activities.

Except for the applicable requirements of §58.6, the responsible entity does not have to comply with the requirements of this part or undertake any environmental review, consultation, or other action under NEPA and the other provisions of law or authorities cited in §58.5 for the activities exempt by this section or projects consisting solely of the following exempt activities:

4. Public services that will not have a physical impact or result in any physical changes, including but not limited to services concerned with employment, crime prevention, child care, health, drug abuse, education, counseling, energy conservation and welfare or recreational needs

2.17 Records Requirement, Monitoring, and Reporting

All subrecipients are required to maintain their project and program files within the applicable system of record as detailed in their SRA. All project-related documents, correspondence and records must be in the file for each participant. Subrecipient must submit reports, as required by OHCS, and in accordance with the requirements detailed in program-specific SRAs.

OHCS shall monitor subrecipients per the OHCS CDBG-DR Monitoring and Compliance Plan. Subrecipients are required to monitor any sub-grantees, if applicable, to ensure compliance. When OHCS monitors subrecipients, it will include a review of any sub-grantee monitoring performed by subrecipients.

Subrecipients shall create and maintain records documenting their performance. The Oregon Secretary of State's office, the federal government, OHCS, and their duly authorized representatives shall have access to subrecipients' books, documents, papers, and records that are directly related to the programs provided herein for the purposes of making audit, examination, excerpts, and transcripts for a period of six years after termination of this agreement.

Subrecipients shall retain all program records pertinent to Housing Recovery Service services and expenditures incurred in a manner consistent with the requirements of state and federal law. This includes, but is not limited to, those requirements listed in 2 CFR Part 200 and 24 CFR Part 570.

Subrecipients shall retain and keep accessible all such fiscal and program records, participant records, digital and electronic records, books, documents, papers, plans, and writings for five years after the closeout of the grant between HUD and OHCS, or such longer period as may be required by applicable law, whichever date is later.

2.17.1 Participant Files

Documentation of participant eligibility and services received must be maintained in participant case files, within the applicable system of record, by the assigned subrecipient. This includes documentation for participants found to be ineligible for services or for participants who are no longer receiving or are no longer eligible to receive services, and shall include the participant's request for services, why they are ineligible, and how it was communicated to the applicant.

OHCS will use subrecipient program policies and procedures and file documentation as the basis for monitoring to ensure subrecipients follow program requirements and regulations.

2.17.2 Closeout

Subrecipients must submit a reconciliation of funds and a final performance report to OHCS. OHCS may request additional information from subrecipients before closing out the program.



Abbreviations and Acronyms

3 Abbreviations and Acronyms

Abbreviation or Acronym	Meaning
AFFH	Affirmatively Furthering Fair Housing
AMI	area median income
CBO	community-based organization
CDBG-DR	Community Development Block Grant Disaster Recovery
DCM	disaster case managers
DCMP	Disaster Case Management Program
FEMA	Federal Emergency Management Agency
HCDA	Housing and Community Development Act of 1974
HUD	U.S. Department of Housing and Urban Development
LEP	limited English proficiency
LMI	low- or moderate-income
MID	most impacted and distressed
ODHS	Oregon Department of Human Services
OHCS	Oregon Housing and Community Services
OREM	Office of Resilience and Emergency Management
PII	personally identifying information
RFU	Rogue Food Unites
SIT	Santiam Service Integration Team
SRA	subrecipient agreement