

2015 ANNUAL ACTION PLAN

Housing and Community Development Programs



State of Oregon

2015 Proposed Annual Action Plan

A Collaborative Interagency Report Prepared By:

Oregon Housing and Community Services

Business Oregon

Oregon Health Authority

Effective January 1, 2015 – December 31, 2015

State of Oregon

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AP-05 Executive Summary

Regulation Citation(s): 24 CFR 91.200(c), 91.220(b), 91.300(c), 91.320(b)

Introduction

The 2015 Annual Action Plan (AAP) describes how the State of Oregon will use funds from the US Department of Housing and Urban Development (HUD) to meet Oregon’s affordable housing and community development needs in the final year of the five year Consolidated Plan. The AAP covers the program year starting January 1, 2015 and ending December 31, 2015.

{ The Consolidated Plan can be found at [2011-2015 Consolidated Plan](#) }

Oregon Housing and Community Services (OHCS) facilitates the development and implementation of the Consolidated Plan and subsequent AAP and Consolidated Annual Performance and Evaluation Report (CAPER). The three State of Oregon agencies involved (referred to collectively as the State) are Business Oregon (BO), OHCS, and Oregon Health Authority (OHA).

The AAP provides a strategic one-year implementation plan for the Community Development Block Grant (CDBG) programs, HOME Investment Partnerships (HOME) program, Emergency Solutions Grants (ESG) program, and Housing Opportunities for Persons with AIDS (HOPWA) program during the 2015 program year. The plan outlines a comprehensive approach to describe the grant and program activities that will meet the identified priority needs in the Consolidated Plan and reflects the planning process to address the housing needs of largely low and moderate-income citizens, improving the livability of communities, and expanding economic opportunities in divergent areas around the state.

Every year the State considers the broader ramifications of decisions about how to spend the scarce resources that affect communities in the Balance of State. The Balance of State encompasses areas not directly funded by a participating jurisdiction or consortium through HUD and vary slightly depending on the fund source though tend to be the non-metropolitan areas of the state. The table on the following page lists Balance of State specifics by fund source.

The AAP is comprised of an executive summary and separate sections related to each grant. Each grant section is further broken down into elements required by HUD designated by “AP” or “SP” and followed by a number (e.g., AP-05 Executive Summary). The elements appear in numerical order for each grant; however, not all elements are required for each grant just those listed in each section.

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Balance of State by Fund Source

| | |
|-------------------|---|
| HOME BoS: | All areas outside of the cities of Corvallis, Eugene/Springfield, Salem/Keizer, Clackamas, Multnomah, and Washington Counties |
| ESG BoS: | Funding to entitlement (HUD direct funding) areas goes to the City of Portland, Clackamas, and Washington Counties. OHCS provides non-entitlement funding to all counties through their Community Action Agency except for Clackamas County |
| CDBG BoS: | Same areas as HOME excluding of the cities of Albany, Ashland, Grants Pass, Beaverton Bend, Medford, Redmond , and Springfield |
| HOPWA BoS: | All areas outside of Clackamas, Columbia, Multnomah, Washington, and Yamhill counties |

2015 Annual Action Plan Outcome Objectives

The outcome objectives of the AAP identify material improvements toward the State’s five-year goals. The State provides funding, facilitation, coordination, capacity-building, and training and technical assistance in close partnership with a wide variety of public and private partners throughout Oregon to achieve the outcome objectives set out in the AAP.

The AAP:

- Summarizes the strategies for preserving and developing affordable housing, addressing homelessness prevention, and advancing both community and economic development opportunities
- Reports progress toward identified goals to date
- Describes the State’s proposal for activities during the coming year to support the five-year priorities and strategies of the 2011-2015 Consolidated Plan
- Explains the State’s method for administering CDBG, HOME, ESG, and HOPWA funds
- Lists the resources available to the State and its subgrantees to advance the five-year strategies
- Reflects citizen input gathered during the public comment period with corresponding responses provided by the State

Evaluation of Past Performance

CDBG

CDBG is administered by Business Oregon – Infrastructure Finance Authority (IFA) the state’s economic development agency. During program year 2014, the one-year goals met or

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exceeded include Economic Development, Public Works (Water/Waste Water and Downtown Revitalization), Public/Community Facilities (SL1), and Community Capacity/Technical Assistance. The annual goals achieving 80 percent and less include Microenterprise Assistance, Public/Community Facilities (SL3 and DH1), Publicly Owned Off-Site Infrastructure, and Housing Rehabilitation.

The following table shows some of the outcome objectives achieved:

| |
|---|
| Microenterprises assisted: 100 |
| Water and Wastewater systems funded: 6 |
| Housing units rehabilitated: 95 |
| CDBG conferences: 3 (93 attendees) |
| CDBG program leveraged in matching funds: \$5,615,000 |

HOME

The goals and objectives of HOME are achieved through the work of OHCS, Oregon’s housing finance agency. The agency also provides housing stabilization services that help increase self-sufficiency of low- and moderate-income Oregonians. Combined Goals 1 and 2 strived to achieve 40 completed affordable housing projects (25 acquisition/rehabilitation and 15 new construction). The OHCS competitive funding process, Notice of Funding Availability (NOFA), addressed those two goals using multifamily rental housing programs. A third goal establishes the measurement of the number of households that received HOME Tenant Based Rental Assistance (HOME TBRA). The HOME program also established a goal of awarding 40 Community Development Housing Organizations (CHDO) operating support grants.

The following table shows the progress toward achieving goals as of December 31, 2014.

| |
|---|
| Projects closed 2010- 2014: 33 of 40 (82.5%) |
| Projects to be closed 2015: 7 |
| CHDO operating support grants 2010-2014: 28 of 40 (70%) |
| Projected CHDO operating support grants 2015: 12 |
| Households served 2010-2014: 3,118 of 3,750 (83%) |
| Projected Households to be served 2015: 600 |

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ESG

The ESG program is administered by OHCS as well. The ESG goals increase the availability and accessibility of homelessness prevention resources by developing and implementing additional activities to stabilize at-risk households, and essential, emergency, and supportive services to homeless individuals and families.

The following table shows ESG achievements for the first four years of the Consolidated Plan (2010-2014) and the projected services for 2015:

Homeless households receiving supportive services 2010-2014: 25,340 (422.3%)
Projected homeless households receiving supportive services 2015: 8,245
Homeless households receiving prevention services 2010-2014: 4,828(160.9%)Projected
homeless households receiving prevention services 2015: 755

HOPWA

OHA administered HOPWA funds in the State of Oregon through the Oregon Housing Opportunities in Partnership (OHOP) program. OHOP provides people living with HIV/AIDS and their families, permanent supportive housing. OHA also works with community housing and social services partners to provide a continuum of HIV services.

In the first three years of the Consolidated Plan period, the OHOP program met or exceeded all but one of the identified goals. The following table shows accomplishments:

Households who received permanent housing placement in the form of deposits: 91 (325%)
Households served (unduplicated): 153 (239%)
Households that received HOPWA TBRA: 64 (100%)
Households with a housing plan to maintain/establish stable on-going residency: 153 (100%)
Households that received support + HOPWA housing assistance and case manager contact within three months (or consistent with individualized plan): 153 (100%)
Households that successfully accessed or maintained qualification for sources of income: 90 (59%)
Households who received support + HOPWA housing assistance and medical insurance coverage/medical assistance: 130 (99%)
Households who received support + HOPWA housing assistance and an income-producing job during the year: 0*
*Activity not currently funded

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Summary of Citizen Participation Process and Consultation Process

The State follows the Citizen Participation Plan outlined in the Consolidated Plan. Many approaches used help to foster open, transparent citizen participation when developing strategic program outcomes and associated action plans. Public forums and multimedia communications occur throughout the state. The State continues to broaden participation by including the following groups:

- | | |
|---|--|
| Residents in the Balance of State communities | Economic development districts |
| State Housing Council | Regional boards and commissions |
| State government agencies | Continuums of Care |
| City and County officials | Community Action Partnership of Oregon |
| Councils of government | Other interested organizations and individuals |
| Non-profits, for-profits, faith-based organizations | |

Additional efforts during the past year involved discussions about refining housing and housing stabilization policy to align with the prosperity efforts statewide. Moreover, several meetings held to initiate each NOFA solicited housing and services partners for feedback as well.

Summary of Public Comments

The State of Oregon received seven comments related to the Community Development Block Grant (CDBG) program Method of Distribution (MOD) and one comment related to the annual action plan. A summary of the public comments and responses are included in Attachment F.

AP-10 Consultation/Coordination

Health Services

Oregon Housing and Community Services (OHCS) staff participates in Regional Coordinated Care Organization Board and Advisory Council (made up of 51% Medicaid recipients) meetings across the state of Oregon. This participation includes providing presentations on regional housing data and collecting feedback on the housing needs of Medicaid recipients. OHCS staff has also been engaged in multiple health and housing innovation learning collaboratives, and has convened a series of regional forums on the need for strategic alignment between the health and affordable housing sector.

OHCS staff participated in the Oregon Health Authority’s (OHA) Addictions and Mental Health Division (AMH) Addictions and Mental Health Planning and Advisory Council (AMHPAC),

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AMHPAC's Executive Committee, and served as chair of the Housing/Olmstead Subcommittee meetings. These work groups were comprised, in large part, by consumers, with state administrators and stakeholder participation. A significant component of this work has been in developing strategic recommendations on Oregon Addictions and Mental Health Division policies, review of grant applications, and to provide oversight of the Oregon Community Mental Health Housing Fund. Further, these groups help ensure state compliance with the State of Oregon and U.S. Department of Justice (DOJ) Olmstead agreement, which addresses implementation of the Americans with Disabilities Act (ADA) and integrated mental health transitional housing services.

OHCS' Tribal Liaison attended the Legislative Commission on Indian Services (LCIS) events, and participated in quarterly meetings of both the Health and Human Services and Economic Development and Community Services committees. Founded in 1975, LCIS provides a conduit for Oregon's nine federally recognized tribes to work with state agencies to foster meaningful communications, maximize understanding between governments, develop professional relationships and partnerships, and address shared areas of concern. OHCS submits an annual Government-to-Government report which describes the activities and services it conducted throughout the year in relation to tribal governments and communities to the Governor's Office and LCIS.

The Oregon Health Authority obtained input from the HIV/VH/STI Integrated Planning Group (IPG) to develop a statewide comprehensive plan for the delivery of HIV prevention and care services throughout the state, including housing services. The membership of IPG is diverse and includes consumers of OHA housing and other HIV care services, as well as representatives from local health departments, AIDS service organizations, HIV health care providers, Coordinated Care Organizations, corrections, educational institutions and other key community based stakeholders. HOPWA funds will be utilized to provide supportive housing for persons living with HIV. Services provided using HOPWA funds are consistent with the priorities of the IPG plan and associated program needs data and client survey results, which show that providing supportive housing to persons living with HIV is a public health priority, as those who have unstable housing are more likely to have uncontrolled viral loads and thus be able to spread HIV.

Homeless Strategies

In order to pursue greater alignment with agencies working on homeless issues, in 2014, OHCS revised the Regional Advisor position to be engaged with health-care facilities; mental health facilities; foster care and other youth facilities; corrections programs and institutions. OHCS reassigned an existing staff person, and hired a new staff person to be "Housing

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Integrators”.

The OHCS Integrator positions will aid in the integration and alignment of affordable housing and housing stabilization tools and resources with family stabilization and self-sufficiency efforts of Oregon's Department of Human Services, as well as other community-based efforts within key State policy areas, including Coordinated Care Organizations, Early Learning Hubs, Regional Achievement Compacts, Workforce Investment Boards and Regional Solutions. The Integrators serve as a conduit of information to OHCS executive leadership about emerging and urgent community trends and opportunities, and to develop recommendations about ways to leverage and/or prioritize OHCS programs.

In 2013, the Oregon Legislature passed HB 2417, which expanded an existing funding source for affordable housing. HB 2417 added \$5 to an existing document recording fee to specifically address veterans housing needs. Of the \$5, 10% goes towards addressing preventing and ending homelessness, 14% goes to homeownership, and 76% goes towards multifamily development. In 2014, OHCS convened a Rules Advisory Committee, which included stakeholders from the Oregon Department of Veterans Affairs, the Federal Veterans Administration, housing developers with expertise in serving veterans, homeless service providers with expertise in serving veterans, and others. The Rules Advisory Committee helped advise the Department about best practices for serving veterans, and provided input into funding priorities and guidelines for the 2015 program year and future years.

In May 2007, the Governor Kulongoski created the Re-entry Council. The Council members are: directors from many state agencies, including OHCS, a State Senator, a State Representative, representatives from the Oregon Association of Community Corrections Directors, the Oregon State Sheriffs Association, the Oregon District Attorneys Association, the Oregon Criminal Defense Lawyers Association, the Oregon Judicial Department, the Oregon Association of Chiefs of Police, social service providers that concentrate on offenders’ transition and business leaders from the employment sector. The Council is working collaboratively to identify and minimize the barriers that offenders find when transitioning out of incarceration.

The OHA OHOP program has a direct referral partnership with the Department of Corrections to ensure persons living with HIV/AIDS who are released from prison are quickly linked to HIV related treatment and services necessary to assist them in transitioning successfully into the community and eliminating disruptions in HIV treatment. DOC referrals are submitted to OHA and triaged to the appropriate HIV case management provider serving the area. HIV case managers then assist transitioning individuals with accessing health insurance and health care, housing, benefits and other supportive services.

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OHCS engages in several ways with local and regional governments to address affordable housing. One engagement strategy is participating in 11 Regional Solutions Advisory Committees throughout the state. Members of Regional Solutions Advisory Committees are appointed by the Governor and include local jurisdictions, business leaders and philanthropy.

Each Regional Solutions Advisory Committee works with teams of State Agency Representatives to address regional issues, priorities and opportunities by leveraging funding opportunities for sound and long-term economic growth. OHCS is an agency representative on the Regional Solutions Teams. The Teams meet regularly with the Advisory Committee and community members. In 2014, OHCS attended several meetings to understand local economic and community development priorities in the following communities: Bend, La Pine, The Dalles, La Grande, Boardman, Coos Bay, Klamath Falls, Medford, and Lebanon.

In addition, OHCS worked with the Oregon Business Council to engage multiple communities in exploring poverty reduction strategies. Those communities include: Albany, Baker City, Bend, Forest Grove, North Bend, and Roseburg.

OHCS was a key participant in the Oregon Affordability, Balance, and Choice workgroup. The Oregon Affordability, Balance and Choice workgroup is a gathering of leaders committed to finding a path to meeting Oregon's housing needs. The workgroup was formed in 2014, and is making recommendations to the 2015 Oregon State Legislature on how to improve access to quality housing for all Oregonians. Several local jurisdictions participated on the workgroup, or presented information about the housing needs in their community including: Lincoln County, City of Eugene, City of Pendleton, City of Ashland, and City of Bend.

OHCS staff served on local housing committees in Lane County, Josephine and Jackson County, Hood River, and City of Bend. In addition to this broader engagement, OHCS staff met with several individual jurisdictions to discuss particular issues in their communities including farmworker housing in Boardman/Port of Morrow; a homeless shelter in Deschutes County; and workforce housing on the coast (Coastal Caucus in Florence).

OHCS staff assisted the Governor's Office and Oregon Business Council in collaboration with the Federal Reserve Bank of San Francisco, United Way of the Columbia-Willamette, ECONorthwest, Oregon's Kitchen Table and Oregon Solutions in developing poverty research and presentation of materials. Staffs coordinated, developed, and facilitated a series of community stakeholder forums throughout the state to explain the human and economic impact poverty has on our communities, garner input on policy recommendations, and conducted strategic public policy workgroups. OHCS staff also participated in facilitating a national design lab in partnership with Oregon Solutions which looked at creating innovative

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new approaches to a broad spectrum of poverty reduction efforts.

Lead Based Paint

The State did not consult with state or local health and child welfare agencies when preparing the portion of the annual plan concerning lead-based paint hazards because, based on existing data and analysis, lead based paint was not identified as a goal; OHCS is not currently developing or monitoring any projects that contain lead paint. However, for future planning, OHCS intends to consult with agencies involved with lead based paint concerns when preparing portions of our plans that address lead-based paint hazards.

Agencys Not Consulted

Because Oregon's primary focus is the balance of state, entitlement communities were not involved in the consultation process for the 2015 Annual Action Plan, however, Oregon regularly partners with entitlement communities on shared goals.

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**CDBG
Administered by Business Oregon**

AP-15 Expected Resources
Regulation Citation(s): 24 CFR 91.220(c)(1, 2), 91.320(c)(1, 2), 91.420(b)

The CDBG program targets funding and gives Business Oregon Infrastructure Finance Authority (IFA) investment flexibility. IFA has no control over the type and quantity of applications submitted for funding under the program. Therefore, after each calendar quarter, IFA conducts a target review to determine if funds need to be transferred from one funding category to another to address program needs. Targeted funding does not obligate IFA to award all the funds targeted for each category. If a sufficient number of projects are not awarded in a particular category, applications in other categories may be funded.

Table A - CDBG Expected Resources

| | 2014 | Target % | 2015 | Target % |
|---|--------------------------|----------|---|----------|
| Annual Allocation from HUD | \$11,914,018 | | 11,744,882 | |
| State Administration 2% (The required match for these funds comes from the Special Public Works Fund (SPWF)). | \$238,280 | 2% | \$234,898 | 2% |
| State Administration \$100,000 - no match funds | \$100,000 | N/A | \$100,000 | N/A |
| State Technical Assistance Set-Aside 1% | \$119,140 | 1% | \$117,449 | 1% |
| Annual Allocation Available for Projects | \$11,456,598 | | \$11,292,535 | |
| Program Income (Note #1) | \$3,361.11 (Note #3) | | \$3,500 (Note #2) | |
| Recaptured Funds | \$39,490.12 (Note #3) | | \$500,000 (Note #2) | |
| ESTIMATED TOTAL AVAILABLE FOR PROJECTS | \$11,499,449.23 | | \$11,796,035 (Note #4) | |
| Microenterprise Assistance | \$344,983.48 | 3% | \$353,881 | 3% |
| Public Works | \$5,634,730.12 | 49% | \$5,780,057 | 49% |
| Community/Public Facilities | \$2,989,856.80 | 26% | \$3,066,969 | 26% |
| Regional Housing Rehabilitation | \$2,529,878.83 | 22% | \$2,595,128 | 22% |

Note #1 When received, program income, is allocated to projects using the target percentages identified above, after taking 2% for state administration.

Note #2 Estimated to be received in 2015.

Note #3 Actual as of the date of the Proposed 2015 Method of Distribution Public Hearing – November 27, 2014.

Note #4 Unobligated amounts from 2014 will be added to this figure.

The final 2015 fiscal year allocation amount will be posted on the Business Oregon website for access by eligible applicants and distributed to the CDBG listserv.

In 2014, the CDBG program has leveraged \$2,050,666.94, as result of the 2013 4th quarter applications that were received by December 31, 2013 and awarded on February 11, 2014. The CDBG program does not require matching funds for the assisted projects funded under the program. CDBG match is described in depth in Method of Distribution (MOD),

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Attachment A. The state provides the required match for the two percent state administration allowance through the Special Public Works Fund (SPWF) program.

CDBG publicly owned property is described in the MOD.

AP-20 Annual Goals and Objectives
 Regulation Citation(s): 24 CFR 91.220(c)(3) and (e), 91.320(c)(3) and (e), 91.300(c), 91.420

The primary objective of the CDBG program is to develop viable communities by providing decent housing and suitable living environments and expanding economic opportunities, principally for low and moderate-income persons. The tables below provide a detailed outline of the proposed activities to undertake with CDBG funds in 2015, the expected outcomes and objectives, performance indicators, and both long and short-term goals and past performance.

Table B - CDBG Outcome Objectives

| OUTCOMES → | AVAILABILITY/ACCESSIBILITY | AFFORDABILITY | SUSTAINABILITY |
|-----------------------------|----------------------------|---------------|----------------|
| OBJECTIVES ↓ | | | |
| Decent Housing | DH1 | DH2 | DH3 |
| Suitable Living Environment | SL1 | SL2 | SL3 |
| Economic Opportunity | EO1 | EO2 | EO3 |

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Table C - Program Year 2014 data through December 31, 2014 (Fourth Quarter) and accrued data from January 1, 2011 to December 31, 2015

| Program Year 2015 Data | | | | OUTCOMES [See Note #1 below] | | | | |
|------------------------|---|--|--|---------------------------------|---------------------------------|--|----------------------------|---|
| Outcome/ Objective | Funding Category | Performance Indicators [See Note #2 below] | Actual Number Funded in 2014 (See Note #3 below) | Total Number Funded by 12-31-14 | Short Term Annual Goal | Actual Number Funded in 2014 and % of Annual Goal Achieved | Long Term Goal by 12-31-15 | Actual Number Funded by 12-31-15 and % of Five Year Goal Achieved |
| | | | | | | | | |
| | | Total LMI Jobs created/Retained | | 19 | | | | |
| | | Funds Leveraged | | \$0 | | | | |
| EO3 | Microenterprise Assistance | Total Microenterprises Assisted | 100 | 399 | Fund 5 projects per year | 3 (60%) | Fund 25 projects | 11 (44%) |
| | | Total LMI Microenterprises Assisted | 76 | 305 | | | | |
| | | Funds Leveraged | | \$10,000 | | | | |
| SL3 | Public Works – Water/Wastewater and Downtown Revitalization | Number Systems Assisted | 11 | 41 | Fund 5 systems per year | 11 (220%) | Assist 25 systems | 41 (164%) |
| | | Total Persons Assisted | 16,796 | 65,880 | | | | |
| | | Total LMI Persons Assisted | 11,761 | 41,233 | | | | |
| | | Funds Leveraged | 1,888,000 | \$9,364,509 | | | | |
| DH3 | Publicly Owned Off-Site Infrastructure | Total Housing Units Assisted | | 0 | Fund 1 project every other year | | Fund 2.5 projects | 0 (0%) |
| | | Total LMI Housing Units Assisted | | 0 | | | | |
| | | Funds Leveraged | | \$0 | | | | |
| SL1 | Public/Community Facilities | Total Facilities Assisted | 2 | 7 | Fund 1 project per | 2 (200%) | Assist 5 | 7 (140%) |

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Table C - Program Year 2014 data through December 31, 2014 (Fourth Quarter) and accrued data from January 1, 2011 to December 31, 2015

| Program Year 2015 Data | | | | OUTCOMES [See Note #1 below] | | | | |
|------------------------|--|--|--|---------------------------------|--|--|----------------------------|---|
| Outcome/ Objective | Funding Category | Performance Indicators [See Note #2 below] | Actual Number Funded in 2014 (See Note #3 below) | Total Number Funded by 12-31-14 | Short Term Annual Goal | Actual Number Funded in 2014 and % of Annual Goal Achieved | Long Term Goal by 12-31-15 | Actual Number Funded by 12-31-15 and % of Five Year Goal Achieved |
| | | | | | | | | |
| | (fire stations, libraries, senior centers, food banks, family resource centers, community centers) | Total Persons Assisted | 1,540 | 24,244 | year | | facilities | |
| | | Total LMI Persons Assisted | 1,540 | 20,168 | | | | |
| | | Funds Leveraged | \$122,072 | \$1,937,871 | | | | |
| SL3 | Public/Community Facilities (drug and alcohol treatment, Head Starts, mental health, health clinics, shelters/workshops for persons with disabilities) | Total Facilities Assisted | 2 | 3 | Fund 1 project every other year | | Assist 2.5 facilities | 3 (120%) |
| | | Total Persons Assisted | 103 | 273 | | | | |
| | | Total LMI Persons Assisted | 100 | 270 | | | | |
| | | Funds Leveraged | \$40,594.94 | \$40,594.94 | | | | |
| DH1 | Public/Community Facilities (domestic violence shelters, homeless shelters) | Total Number of Beds Created | | 8 | Fund 1 project per year | | Assist 5 facilities | 1(20%) |
| | | Funds Leveraged | | \$0 | | | | |
| DH3 | Housing Rehabilitation | Total Number of Units rehabbed | 85 | 416 | Fund 6 projects per year | 2 (33%) | Fund 30 projects | 16 (53%) |
| | | Funds Leveraged | \$0 | \$878,500 | | | | |
| SL1 | Public Services | Total Persons Assisted | | 0 | Fund 3 projects per year, if category is offered | Funding category not offered in | Fund 15 projects | Does not apply. Funding category has |
| | | Total LMI Persons Assisted | | 0 | | | | |

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| Table C - Program Year 2014 data through December 31, 2014 (Fourth Quarter) and accrued data from January 1, 2011 to December 31, 2015 | | | | | | | | |
|---|---|---|--|---------------------------------|------------------------|--|----------------------------|---|
| Program Year 2015 Data | | | | OUTCOMES [See Note #1 below] | | | | |
| Outcome/ Objective | Funding Category | Performance Indicators [See Note #2 below] | Actual Number Funded in 2014 (See Note #3 below) | Total Number Funded by 12-31-14 | Short Term Annual Goal | Actual Number Funded in 2014 and % of Annual Goal Achieved | Long Term Goal by 12-31-15 | Actual Number Funded by 12-31-15 and % of Five Year Goal Achieved |
| | | | | | | Funds Leveraged | | \$0 |
| SL3 | Emergency Projects | The Department does not anticipate future disasters and ensures that if a bona fide disaster occurs in the future the projects will meet the CDBG program requirements and be reported accordingly. | | | | | | |
| N/A | Community Capacity/Technical Assistance | Number of Training Events Held | 3 | 13 | Fund 3 per year | 3 (100%) | 15 training events funded | 13 (86%) |
| | | Number of Attendee's | 306 | 1,369 | | | | |

Note #1 - Outcomes - Actual Number Funded – The actual number funded is based upon the awards made during the program year. The final actual outcomes/accomplishments from each grant awarded by the state will be collected when the grant activities are complete and the grant contract between the city/county and the state is administratively closed and will be reported in IDIS as part of the CAPER.

Each grant recipient is allowed a specified period to complete the CDBG funded activities and this period varies by type of grant. This period is referred to as the Project Completion Date (PCD). The state allows PCD extensions if the local circumstances warrant the extensions. Each PCD extension is reviewed on a case-by-case basis. A summary of the standard PCD periods are:

- 1 year PCD – Applies to microenterprise assistance grants and housing center grants.
- 2 year PCD – Planning grants, final design only grants, construction only grants, off-site infrastructure grants and housing rehabilitation grants.
- 3 year PCD – Final design and construction activities combined into one grant.

Note #2 - The state may select activities/priorities for the 2011-2015 CDBG program from the table above. The proposed outcome and performance measure requirements, performance indicators, and the short and long-term goals for each activity will only be triggered if the activity is actually offered.

Note #3- At the time of this report, with the exception of the community capacity/technical assistance data, the data in this column reflects the 4th quarter 2013 applications that were received by December 31, 2013 and awarded on February 11, 2014. The 2014 CDBG Performance Evaluation Report (PER), will amend the 2013 PER narrative to include these awards.

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Table D - Program Year 2015 through 11/25/2015 (3rd Quarter) and accrued data from 1/1/2011 through 12/31/2015

| Program Year 2015 Data | | | | OUTCOMES [See Note #1 below] | | | | |
|------------------------|---|---|---|--|------------------------------------|---|-----------------------------------|--|
| Outcome/ Objective | Funding Category | Performance Indicators [See Note #2 below] | Actual Number Funded in 2015 [See Note #3 below] | Total Number Funded by 12-31-15 | Short Term Annual Goal | Actual Number Funded in 2014 and % of Annual Goal Achieved | Long Term Goal by 12-31- 15 | Actual Number Funded by 12-31-15 and % of Five Year Goal Achieved |
| | | | | EO3 | Economic Development | Jobs Created/Retained | | 35 |
| | | Total LMI Jobs created/Retained | | 19 | | | | |
| | | Funds Leveraged | | \$0 | | | | |
| EO3 | Microenterprise Assistance | Total Microenterprises Assisted | | 399 | Fund 5 projects per year | 3 (60%) | Fund 25 projects | 11 (44%) |
| | | Total LMI Microenterprises Assisted | | 305 | | | | |
| | | Funds Leveraged | | \$10,000 | | | | |
| SL3 | Public Works – Water/Wastewater and Downtown Revitalization | Number Systems Assisted | | 41 | Fund 5 systems per year | 11 (220%) | Assist 25 systems | 41 (164%) |
| | | Total Persons Assisted | | 65,880 | | | | |
| | | Total LMI Persons Assisted | | 41,233 | | | | |
| | | Funds Leveraged | | \$9,364,509 | | | | |
| DH3 | Publicly Owned Off-Site Infrastructure | Total Housing Units Assisted | | 0 | Fund 1 project every other year | | Fund 2.5 projects | 0 (0%) |
| | | Total LMI Housing Units Assisted | | 0 | | | | |
| | | Funds Leveraged | | \$0 | | | | |
| SL1 | Public/Community Facilities (fire stations, libraries, senior centers, food banks, family | Total Facilities Assisted | | 7 | Fund 1 project per year | 2 (200%) | Assist 5 facilities | 7 (140%) |
| | | Total Persons Assisted | | 24,244 | | | | |

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Table D - Program Year 2015 through 11/25/2015 (3rd Quarter) and accrued data from 1/1/2011 through 12/31/2015

| Program Year 2015 Data | | | | OUTCOMES [See Note #1 below] | | | | |
|------------------------|--|---|--|---------------------------------|---|--|----------------------------|---|
| Outcome/ Objective | Funding Category | Performance Indicators [See Note #2 below] | Actual Number Funded in 2015 [See Note #3 below] | Total Number Funded by 12-31-15 | Short Term Annual Goal | Actual Number Funded in 2014 and % of Annual Goal Achieved | Long Term Goal by 12-31-15 | Actual Number Funded by 12-31-15 and % of Five Year Goal Achieved |
| | | | | | resource centers, community centers) | Total LMI Persons Assisted | | 20,168 |
| | | Funds Leveraged | | \$1,937,871 | | | | |
| SL3 | Public/Community Facilities (drug and alcohol treatment, Head Starts, mental health, health clinics, shelters/workshops for persons with disabilities) | Total Facilities Assisted | | 3 | Fund 1 project every other year | | Assist 2.5 facilities | 3 (120%) |
| | | Total Persons Assisted | | 273 | | | | |
| | | Total LMI Persons Assisted | | 270 | | | | |
| | | Funds Leveraged | | \$40,594.94 | | | | |
| DH1 | Public/Community Facilities (domestic violence shelters, homeless shelters) | Total Number of Beds Created | | 8 | Fund 1 project per year | | Assist 5 facilities | 1(20%) |
| | | Funds Leveraged | | \$0 | | | | |
| DH3 | Housing Rehabilitation | Total Number of Units rehabbed | | 416 | Fund 6 projects per year | 2 (33%) | Fund 30 projects | 16 (53%) |
| | | Funds Leveraged | \$0 | \$878,500 | | | | |
| SL1 | Public Services | Total Persons Assisted | | 0 | Fund 3 projects per year, if category is offered under the program. | Funding category not offered in 2013 | Fund 15 projects | Does not apply. Funding category has not been offered. |
| | | Total LMI Persons Assisted | | 0 | | | | |
| | | Funds Leveraged | | \$0 | | | | |
| SL3 | Emergency Projects | The Department does not anticipate future disasters and ensures that if a bona fide disaster occurs in the future the projects will meet the CDBG program | | | | | | |

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Table D - Program Year 2015 through 11/25/2015 (3rd Quarter) and accrued data from 1/1/2011 through 12/31/2015

| Program Year 2015 Data | | | | OUTCOMES [See Note #1 below] | | | | |
|------------------------|---|---|---|--|---------------------------|---|-----------------------------------|--|
| Outcome/ Objective | Funding Category | Performance Indicators [See Note #2 below] | Actual Number Funded in 2015 [See Note #3 below] | Total Number Funded by 12-31-15 | Short Term Annual Goal | Actual Number Funded in 2014 and % of Annual Goal Achieved | Long Term Goal by 12-31- 15 | Actual Number Funded by 12-31-15 and % of Five Year Goal Achieved |
| | | | | | | requirements and be reported accordingly. | | |
| N/A | Community Capacity/Technical Assistance | Number of Training Events Held | | 13 | Fund 3 per year | 3 (100%) | 15 training events funded | 13 (86%) |
| | | Number of Attendee's | | 1,369 | | | | |

Note #1 - Outcomes - Actual Number Funded – The actual number funded is based upon the awards made during the program year. The final actual outcomes/accomplishments from each grant awarded by the state will be collected when the grant activities are complete and the grant contract between the city/county and the state is administratively closed and will be reported in IDIS as part of the CAPER.

Each grant recipient is allowed a specified period to complete the CDBG funded activities and this period varies by type of grant. This period is referred to as the Project Completion Date (PCD). The state allows PCD extensions if the local circumstances warrant the extensions. Each PCD extension is reviewed on a case-by-case basis. A summary of the standard PCD periods are:

- 1 year PCD – Applies to microenterprise assistance grants and housing center grants.
- 2 year PCD – Planning grants, final design only grants, construction only grants, off-site infrastructure grants and housing rehabilitation grants.
- 3 year PCD – Final design and construction activities combined into one grant.

Note #2 - The state may select activities/priorities for the 2011-2015 CDBG program from the table above. The proposed outcome and performance measure requirements, performance indicators, and the short and long-term goals for each activity will only be triggered if the activity is actually offered.

Note #3- Actual number of funded projects will be inserted at the close of the program year, 12/31/15, and will be reflected in the 2015 CAPER.

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AP-25 Allocation Priorities

Regulation Citation: 24 CFR 91.320(d)

Priorities for CDBG funds are consistent with the policies and priorities contained in the 2011-2015 Consolidated Plan approved by HUD on February 14, 2011.

Section 106(d)(2)(C)(iii) of the Housing and Community Development Act (HCDA) prohibits a state from declaring certain statutorily eligible activities as ineligible for funding under the state's program, but allows a state to establish funding priorities among the types of eligible activities. In accordance with the HCDA, the state will consider applications for funding consistent with the identified funding priorities within the 2015 MOD.

The priorities eligible for funding under the state's 2015 CDBG program are:

- Microenterprise Assistance Public Services: Recruitment, screening, and providing classroom training to microenterprise owners and persons developing microenterprises
- Public Works:
 - Type One: Public water and wastewater system improvements
 - Type Two: Off-Site Infrastructure for new affordable housing
- Public/Community Facilities: Community facilities that rarely produce a reliable or sufficient revenue stream to repay a loan
- Community Capacity/Technical Assistance: Grants for local capacity building
- Emergency Projects: Projects arising from bona fide emergencies
- Housing Rehabilitation:
 - Type One – Regional Housing Rehabilitation Revolving Loan Fund
 - Type Two – Regional Housing Rehabilitation Grant Fund

AP-30 Method of Distribution

Regulation Citation: 24 CFR 91.320(d) and (k)

Applications for CDBG funded activities are accepted quarterly, with the exception of community capacity/technical assistance and emergency projects. Local governments that wish to apply must work with a regional coordinator to establish preliminary eligibility and develop a Project Notification and Intake Form (PNIF). If successful at that point, IFA requests a full application that is processed in that quarter. Refer to the MOD for more detailed information.

Activities (Funding Priorities)

CDBG funded activities include public works, public/community facilities, housing rehabilitation, microenterprise assistance, community capacity/technical assistance and emergency projects.

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Reasons for Allocation

Targeted allocation of funds is based upon previous demand and IFA’s cost/benefit analyses, and provides IFA investment flexibility. After each calendar quarter, IFA 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 IFA to award all the funds targeted for each category. If a sufficient number of projects are not awarded in a particular category, applications in other categories may be funded.

Table E - CDBG Outcome Objectives Addressed

| ACTIVITY | OUTCOME | OBJECTIVE |
|---|------------------------------|--------------------------------|
| Public Works – (wastewater, water , downtown revitalization) | Suitable Living Environments | Sustainability |
| Public/Community Facilities – (senior centers, food banks, community centers, fire stations, libraries, family resource centers) | Suitable Living Environments | Availability/ Accessibility |
| Public/Community Facilities – (Head Starts, drug and alcohol treatment facilities, mental health treatment facilities, shelters and workshops for person with disabilities, health clinics) | Suitable Living Environments | Sustainability |
| Public/Community Facilities – (domestic violence shelters, emergency/homeless shelters) | Decent Housing | Availability/ Accessibility |
| Housing Rehabilitation | Decent Housing | Sustainability |
| Emergency Projects | Suitable Living | Sustainability |
| Community Capacity/Technical Assistance | | |
| Microenterprise Assistance | Economic Development | Sustainability |

The MOD contains a large amount of information and is not replicated here. The MOD includes the criteria used in evaluating applications, the relative importance of the criteria, how resources are allocated among funding categories, available resources, other various thresholds involved, and grant limits.

The State does not intend to assist units of local government apply for guaranteed loan funds under 24 CFR Part 570(M).

Outcome and Performance Measures

Each applicant to the CDBG program must address how a project meets the objective(s), outcome(s), indicators, and performance measures identified in the tables below:

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Table F - Microenterprise Assistance (Public Services)

| Objective | Outcome | Indicators | Performance Measures | State Measurement |
|---------------------------------|--|---|--|--|
| Creating Economic Opportunities | Sustainability/ Promoting Livable or Viable Communities | <i>Number of persons assisted:</i> With new access to a service With improved access to a service Where the project meets a quality standard or measurably improves quality, report the number of households that no longer have access to a substandard facility or infrastructure only (as defined by the local community) | Amount of money leveraged from other federal, state, local, and private resources | The amount of money leveraged from all other funding sources |
| | | | Number of persons assisted | Number of persons having access to more microenterprise assistance services including the percentage of low and moderate-income persons that benefit |
| | | | Number of communities assisted | Number of persons benefiting from new microenterprise services including the percentage of low and moderate-income persons that benefit |
| | | | Race, ethnicity, disability (current categories for beneficiary reporting still apply) | |

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| Table G - Public Works Water and Wastewater Projects | | | | |
|---|--|--|--|--|
| Objective | Outcome (Choose One) | Indicators | Performance Measures | State Measurement |
| Suitable Living Environment | Availability/ Accessibility Sustainability/ Promoting Livable or Viable Communities | <i>Number of households assisted with:</i> | Amount of money leveraged from other federal, state, local, and private resources | The amount of money leveraged from all other funding sources |
| | | New access to service or benefit | | |
| | | Improved access to service or benefit | Number of persons, households or units assisted (choose the one that is most appropriate to your project) | Number of persons having access to more affordable facilities and services including the percentage of low and moderate-income persons who benefit from the improvements |
| | | Where the project is used to meet a quality standard or measurably improves quality, report the number of households that no longer have access to a substandard facility or infrastructure only (as defined by the local community) | | |
| | | Number of low and moderate-income persons served by the project | Number of systems brought up to environmental/safety standards or upgraded | |
| | | Number of communities assisted | Number of persons benefiting from new or improved facilities including the percentage of low and moderate-income persons who benefit from the improvements | |
| | | Race, ethnicity, disability (current categories for beneficiary reporting still apply) | | |

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Table H - Publicly Owned Off-Site Infrastructure

| Objective | Outcome (Choose One) | Indicators | Performance Measures | State Measurement |
|---------------------------------|--|--|---|--|
| Decent Affordable Housing | Sustainability/ Promoting Livable or Viable Communities | <i>Number of renter and owner-occupied units created:</i> | Amount of money leveraged from other federal, state, local, and private resources | The amount of money leveraged from all other funding sources |
| | | Number subsidized by federal, state, or local programs | Number of persons, households or units assisted (choose the one that is most appropriate to your project) | Number of persons having access to more affordable facilities and services including the percentage of low and moderate-income persons who benefit from the improvements |
| | | Number occupied by elderly (head of household or spouse age 60 or older) | | Number of units created |
| | | Number of units made handicapped accessible | Number of communities assisted | Number of persons benefiting from new or improved housing including the percentage of low and moderate-income persons who benefit from the improvements |
| | Race, ethnicity, disability (current categories for beneficiary reporting still apply) | | | |

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| Table I - Public/Community Facility Projects | | | | |
|--|--|--|---|--|
| Objective (Pick One) | Outcome (Pick One) | Indicators | Performance Measures | State Measurement |
| Decent Housing Suitable Living Environment | Availability/ Accessibility | <i>Number of households assisted with:</i> | Amount of money leveraged from other federal, state, local, and private resources | The amount of money leveraged from all other funding sources |
| | Affordability | New access to service or benefit | | |
| | | Improved access to service or benefit | Number of persons, households or units assisted (choose the one that is most appropriate to your project) | Number of persons having access to more affordable facilities and services including the percentage of low and moderate-income persons who benefit from the improvements |
| | | Where the project is used to meet a quality standard or measurably improves quality, report the number of households that no longer have access to a substandard facility or infrastructure only (as defined by the local community) | | |
| | | <i>Homeless /Emergency Shelter activities:</i> | | |
| | | Number of homeless persons given overnight shelter | Number of low and moderate-income persons served by the project | Number of systems brought up to environmental/safety standards or upgraded |
| | Number of beds created in overnight shelter or other emergency housing | Number of communities assisted | Number of persons benefiting from new or improved facilities including the percentage of low- and moderate-income persons who benefit from the improvements | |
| | | Race, ethnicity, disability (current categories for beneficiary reporting still apply) | | |

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| Table J - Housing Rehabilitation Projects | | | |
|--|--|--|---|
| Objective | Outcome (Pick One) | Indicators | Performance Measures |
| Decent Affordable Housing | Sustainability/ Promoting Livable or Viable Communities | <i>Number of owner-occupied units rehabilitated or improved:</i> | Amount of money leveraged from other federal, state, local, and private resources |
| | | Number using lead-safe working practices (Pre-1978 units, where \$5,000 or more of rehab work is completed and any lead safe practices used) | Number of persons, households or units assisted (choose the one that is most appropriate to your project) |
| | | Number subsidized by federal, state, or local programs | Number of low and moderate-income persons served by the project |
| | | Number occupied by elderly (head of household or spouse age 60 or older) | Number of communities assisted |
| | | Number of units made handicapped accessible | Race, ethnicity, disability (current categories for beneficiary reporting still apply) |
| | | | Number of units rehabilitated |

| |
|---|
| <p>AP-35 Projects Regulation Citation(s): 24 CFR 91.220(d), 91.420</p> |
|---|

Obstacles

In mid-2008, the country and state experienced an economic recession that affected every segment of society, especially the low and moderate-income families and neighborhoods. Many cities and counties were reluctant to apply for CDBG funds projects because they were unable to secure additional project funds in the poor economy. Many communities experienced budget cuts and staff reductions, which resulted in decreased capacity at the local level to administer the complex CDBG grants.

In 2012, IFA authored a local “Rural Capacity Report” that identified barriers faced by local governments in the implementation of projects. This report identified several areas of local capacity development needs, such as:

- Lack of capacity to meet the application and administrative requirements of the program; the state and federal requirements are too complex
- Lack of resources to educate staff about the program requirements
- Underestimating the complexity of administering a project and overseeing construction

Regardless of these barriers, the state saw an increased need for the CDBG program. This increase continued through 2013. In 2013, the state obligated a total of \$23,685,449.29 (includes \$10,665,600 from

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2013 - 1st-3rd quarters and \$13,019,849.29 from 2013 - 4th quarter awarded February 11, 2014). The 2014 CDBG Performance Evaluation Report (PER) will amend the 2013 PER narrative, to include the 4th quarter awards. This amount slightly exceeds Program Year 2005, which had been the best year on record for the state's CDBG program when \$23,312,437 was obligated.

Oregonians are generally not aware of water, wastewater, medical, fire safety, and other needs until a crisis occurs. Therefore, the state's CDBG program continues to alleviate the effects of the economy by creating jobs, assisting microenterprises, improving infrastructure, providing housing rehabilitation, and constructing essential community facilities. However, the primary obstacle in meeting underserved needs remains the lack of funding. Federal and state funding are simply not enough to meet demand, even when coordinating funding with the US Department of Agriculture's Rural Utility Service, Oregon Department of Environmental Quality, the Environmental Protection Agency, the lottery-funded Special Public Works Fund and Water/Wastewater Financing Program, and others. The estimated demand for 2014 is \$22 million, exceeding the 2014 allocation amount available for projects of \$11,499,449.23, or by a ratio of nearly 2:1.

AP-40 Section 108 Loan Guarantee

Regulation Citation: 24 CFR 91.320(k)(1)(ii)

In the state CDBG program, Section 108 Loan Guarantees are not identified as a priority for funding.

AP-45 Community Revitalization Strategies

Regulation Citation: 24 CFR 91.320(k)(1)(ii)

The development of community revitalization plans is not a priority under the state's CDBG program; however, Units of General Local Government (UGLG) can develop their revitalization strategies with their own funds or non-CDBG funds. If there is a component of the strategy that fits within the CDBG funding priorities within the MOD and is eligible for funding under the CDBG program (e.g., upgrade city wastewater system, rehabilitate the community facility) the UGLG could apply for CDBG assistance for that component of their identified revitalization plan.

AP-50 Geographic Distribution

Regulation Citation(s): 24 CFR 91.220(f), 91.320(f), 91.420

CDBG Non-housing and CDBG Housing Rehab funds are not distributed on a geographical basis. CDBG funds are distributed statewide in Balance of State areas to eligible units of general local government, awarded on a quarterly basis. Should the potential awards, by category, if funded, cause a category's annual funding target to be exceeded in a given quarter's application round, IFA will review the funding targets.

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Targeted funding gives IFA investment flexibility. Targeted funding does not obligate the department to award all the funds targeted for each category. If a sufficient number of projects are not awarded in a particular category, applications in other categories may be funded. Each calendar quarter the department will conduct a target review and determine if funds need to be moved from one category to another to address program needs. Refer to the MOD for additional information. The state does not restrict the type and quantity of the applications reviewed. The state distributes funds through a quarterly process and cannot predict the ultimate geographic distribution of funds.

AP-75 Barriers to Affordable Housing

Regulation Citation(s): 24 CFR 91.220(j), 91.320(i), 91.420

IFA administers CDBG funds for the Balance of State cities and counties and educates its recipients about fair housing responsibilities in several ways including:

- presentations at workshops
- provision of an updated comprehensive Grant Management Handbook
- provision of informational handouts, posters, brochures and individual technical assistance, as needed or requested
- sending recipients notices of workshops or conferences which address fair housing issues
- completing a new statewide Analysis of Impediments (AI) to Fair Housing Choice and Fair Housing Action Plan that is made available to recipients to identify, plan for, and remove impediments to fair housing choice

The efforts of IFA identified below address the following impediments identified in the 2011-2015 AI to Fair Housing choice:

- A(2) - Need to initiate communication with the Oregon Department of Land Use and Conservation Development (DLCD) to review land use laws in the non-entitlement areas of the state of Oregon to identify and attempt to overcome any impediments to fair housing choice inadvertently created by these laws;
- B(1) – Lack of coordinated fair housing outreach and educational methods in the Balance of State areas of Oregon;
- B(2) – Lack of understanding of fair housing laws and complaint system;
- B(3) - Establish a strategic communication plan to increase knowledge of fair housing laws in Oregon;
- C(1) – Refusal to allow reasonable accommodations. Enhance outreach and education activities to increase understanding of common discriminatory actions seen in the rental market;
- C(2) – Discrimination against Section 8 voucher holders;
- C(3) – Discriminatory terms and conditions in the market place. Enhance outreach and education activities to consumers to overcome the two types of discriminatory activities (i.e., refusal to allow reasonable accommodation and discrimination against Section 8 voucher holders) in the rental markets; and,
- C(4) – Discriminatory refusal to rent.

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IFA continues to fund fair housing activities through the Fair Housing Council of Oregon (FHCO) and the Greater Eastern Oregon Economic Development District (GEODC). Since January 2011, IFA has funded \$320,800 to complete activities that further fair housing and remove impediments to fair housing choice:

- FHCO (contract from July, 2011 to December, 2012) for \$55,000
- GEODC (contract from July, 2011 to June, 2012) for \$20,000
- FHCO (contract for 3 workshops in 2013) for \$8,000
- GEODC (contract from July, 2012 to June, 2014) for \$32,000
- FHCO (contract from July, 2013 to December, 2013) for \$65,800
- FHCO (contract from April, 2014 to December, 2015) for \$140,000

Table K below summarizes the impediments identified in the 2011-2015 AI to Fair Housing Choice and Fair Housing Action Plan addressed by IFA and the actions taken through its contractors to address the identified impediments.

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Table K - Efforts to Remove Barriers/Impediments to Fair Housing

| Identified Impediment in the 2011-2015 Analysis of Impediments | Action | Work to be Contracted by OBDD-IFA to full fill the requirements of the 2011-2015 Fair Housing Action Plan | Outcome | Measurement | FHCO Contract April 1, 2014 to December 31, 2015 | Actions completed in 2014 as of December 31, 2014 | Aggregated Actions taken from 2011-2015 |
|---|--|---|---|---|--|--|--|
| <p>A – Organizational/ Political constraints</p> <p>A(2)-Local zoning constraints and Not-In-My-Backyard philosophies tend to restrict inclusive housing production policies; existence of such policies or administrative that may not be in the spirit of affirmatively furthering fair housing.</p> | <p>Initiate communication with the Oregon Department of Land Use and Conservation Development (DLCD), to review land use laws within the non-entitlement areas of Oregon to identify and attempt to overcome any impediments to fair housing choice created by these laws.</p> | <p>The initiation, coordination and completion of 4 meetings with DLCD to discuss non-entitlement land use laws. The development of a summary “white paper” of the results of the 4 meetings.</p> | <p>Better understanding of the impacts of Oregon law.</p> | <p>The completion of 4 meetings with DLCD and summary of the meeting results.</p> | <p>Task 1 - Conduct 2 additional meetings with DLCD to discuss non-entitlement land use laws and the development of a summary “white paper” of the results of the 4 meetings.</p> <p>Create a 15-20 minute educational video to be shown as part of training for non-entitlement area land use and policy decision makers as well as area housing consumers and advocates to explain the basic concepts of AFFH. Show the video to 6 non-entitlement areas.</p> | <p>Task 1 - FHCO director had teleconference with DLCD on June 20, 2014.</p> <p>The educational video is complete and can be found at: http://vimeo.com/user25658681/review/100159910/2ec832ee0e</p> <p>Video has been distributed to all public housing authority directors in Oregon and viewed 322 times.</p> <p>On July 16, 2014 video was shown at the Union County Court House for county staff.</p> <p>In September, 2014, 450 representative of small cities in Oregon received a direct e-mail with link to the video</p> <p>October 29, 2014 video was shown at the Neighborhood Partnerships statewide conference, approximately 400 participants attended and as a result 91 vimeo showings were tracked on line.</p> | <p>Task 1 - Three meetings have been held: October 25, 2012 in Salem and June 20, 2013 in Salem and a teleconference on June 20, 2014.</p> <p>The educational video is complete and can be found at: http://vimeo.com/user25658681/review/100159910/2ec832ee0e</p> <p>Video has been distributed to all public housing authority directors in Oregon and viewed 322 times.</p> <p>On July 16, 2014 video was shown at the Union County Court House for county staff.</p> <p>In September, 2014, 450 representative of small cities in Oregon received a direct e-mail with link to the video</p> <p>October 29, 2014 video was shown at the Neighborhood Partnerships statewide conference, approximately 400 participants attended and as a result 91 vimeo showings were tracked on line.</p> |

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| <p>B- Structural Barriers</p> <p>B(1)-Need for more effective outreach and education methods, such as television and radio advertisements, seminars, webinars and other dissemination methods not currently utilized by the state, particularly in the non-entitlement areas of Oregon.</p> <p>B(2)-Need to increase knowledge of fair housing and fair housing complaint system.</p> | <p>Increase knowledge of fair housing laws in Oregon.</p> | <p>The development and completion of educational outreach activities regarding fair housing laws and complaint system. Using standard and alternative (non-traditional) dissemination media, such as television, radio advertisements, webinars, seminars, and other communication media not currently utilized by the state.</p> <p>The development and effective distribution of printed information explaining current Oregon Law, including who is protected and what constitutes illegal discriminatory treatment.</p> <p>The development informative brochures.</p> | <p>Consistent effort at public and partner education.</p> | <p>Number of educational outreach activities and events that were completed, dates, attendees and their locations.</p> <p>The number of informative brochures distributed and identification of the distribution locations.</p> | <p>Task 2 - Conduct at least 8 mass media outreach activities. These activities may include PSAs, radio interviews, television appearances, and outreach events in local communities. Including posting a combination of 200 Twitter feeds, Face book posts, Blog posts and news articles each year. Spanish-language outlets will be targeted for these activities.</p> <p>Conduct 6 listening sessions for non-entitlement jurisdiction residents to collect input on fair housing concerns in at least the following areas: land use and regulatory barriers, housing opportunity, segregation of specific populations, access to housing.</p> | <p>Task 2 - One day long outreach event at the mobile Mexican Consulate in Southern Oregon on May 16&17, 2014 – 300 attendees.</p> <p>One day long outreach event at the mobile Mexican Consulate in The Dalles on June 28, 2014 – 120 attendees.</p> <p>Mexican Independence Day event in Ontario – 500 attendees, on September 14, 2014.</p> <p>In 2014, There have been 321 news articles submitted, with 265 Facebook/Twitter and 4 blogs for 589 as of December 31, 2014.</p> <p>Four radio interviews on KCMB, KWRL, La Grande on July 15, 2014 ; KUMA, Pendleton on July 18, 2014; KPPT, Newport on October 24, 2014; KNCU/ KYTE, Lincoln City, on October 28, 2014</p> <p>And 34 calls resulting from the Google/ Internet Searches.</p> <p>4 listening sessions have occurred: September 11, 2014</p> | <p>Task 2 - 13 mass media outreach events have been completed; A radio interview with the La Pantera (KWBY) in Woodburn, OR, on November 17, 2011; A fair housing program and discussion on cable television in Jackson and Josephine Counties; A Medford radio interview (KEHD) on March 8, 2012; A Resource Fair in Hood River with 150 attendees; A radio interview on KUMA radio, Am radio in Pendleton on August 20, 2012; A radio interview on Jefferson Radio/OPB Ashland on September 2012; A radio interview on KSHD covering Shady Cove and Eagle Point on February 28, 2013; An Employee fair for the 400 employees of Amy’s Frozen Foods in White City on August 21, 2013; A radio interview on the Jefferson Exchange public radio covering Eugene to Northern CA on November 14, 2013; A radio interview on KBKR for Union and Baker counties on December 7, 2013; and, two day long outreach events with the Mexican Consulate, one in Southern Oregon on May 16 & 17, 2014 and one in The Dalles on June 28, 2014.</p> <p>Mexican Independence Day event in Ontario – 500 attendees, on September 14, 2014.</p> |

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| | | | | | <p>Task 4 – Show newly updated "Anywhere But Here" display in at least 10 non-entitlement communities</p> | <p>with the Oregon Child Development Coalition staff, 8 participants; September 11, 2014 Oregon Child Development Coalition staff, 35 participants; October 21, 2014 Legal Services of Oregon staff in Newport, 2 participants; October 22, 2014 Community Services Consortium staff, Newport, 2 participants.</p> <p>Task 4 – The display is being shown at Four Rivers Cultural Center in Ontario from July to mid December 2014. On October 30, 2014 the display was exhibited at the Ford Family Foundation in Roseburg</p> | <p>In 2014, There have been 321 news articles submitted, with 265 Facebook/Twitter and 4 blogs for 589 as of December 31, 2014.</p> <p>Four radio interviews on KCMB, KWRL, La Grande on July 15, 2014 ; KUMA, Pendleton on July 18, 2014; KPPT, Newport on October 24, 2014; KNCU/ KYTE, Lincoln City, on October 28, 2014</p> <p>And 34 calls resulting from the Google/ Internet Searches.</p> <p>4 listening sessions have occurred: September 11, 2014 with the Oregon Child Development Coalition staff, 8 participants; September 11, 2014 Oregon Child Development Coalition staff, 35 participants; October 21, 2014 Legal Services of Oregon staff in Newport, 2 participants; October 22, 2014 Community Services Consortium staff, Newport, 2 participants.</p> <p>Task 4 – A new traveling display "Anywhere but here" was developed.</p> <p>– The display is being shown at Four Rivers Cultural Center in Ontario from July to mid December.</p> |

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| | | | | | <p>Task 5 - Distribute 20,000 information materials about fair housing to housing consumers, providers, government agency staff, and the general public</p> <p>Task 6 - Distribute 5,000 fair housing newsletters</p> | <p>Task 5 – 2,665 informational materials have been distributed in the non-entitlement areas.</p> <p>Task 6 – The April, September and end of year 2014 newsletters were distributed 8,753 recipients.</p> | <p>Task 5 - Fair housing posters were revised and translated into Spanish by April 16, 2012. Developed a new brochure “Fair Housing for Students” and Fair Housing for Real Estate Professionals”. A total of 2,915 English and 100 Spanish brochures were distributed. A fair housing tab has been added to GEODC’s web site. During 2013, a total of 9,753 fair housing materials have been distributed. To date in 2014, 2,665 informational materials have been distributed in the non-entitlement areas.</p> <p>Task 6 – 8325 newsletters were distributed by the FHCO. GEODC distributed Fair Housing information via GEODC newsletters, the Southwest Regional Alliance and at the Morrow County Commissioners meeting. In 2013 there were 197 Tweets, 224 Facebook posts and 78 articles distributed.</p> |

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| | | | | | <p><u>Task 8</u> – Further work on this task was moved to C-Rental Markets (C-2) below.</p> | | <p><u>Task 8</u> -15 workshops have been held: August 22, 2011, Corvallis; August 25, 2011, La Grande; September 12, 2011, Jackson County; October 25, 2011, Salem; May 2, 2012 Tillamook and Hood River; June 21, 2012, St. Helens (Landlord) and St. Helens (Agencies/Jurisdictions); July 18, 2012, Madras, Oregon Child Development Corporation advocates; September 14, 2012, Roseburg, Neighborworks Umpqua, UCAN and HADCO; and June 11, 2013 in Ontario. In these workshops a total of 1,192 resource material packets, in 8 different languages have been distributed. During 2013 the following workshops were conducted with 113 attendees: Multi-Family Housing NW on September 19, 2013; Northeast Oregon Housing Authority on October 21, 2013; Emergency Shelter and Transitional Housing in Jackson and Josephine counties on November 5, 2013; and Adult Foster Care providers on St. Helens on December 30, 2013.</p> <p>GEODC conducted Fair Housing Workshops for Umatilla County on November 17, 2011, and Morrow County.</p> |

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| | | | | | <p>Task 9 - Identify at least 40 partners to be fair housing resources at the local level to increase the capacity to perform education and outreach. Conduct training's for 15 partners to enable them to effectively communicate fair housing information in their locality.</p> | <p>Task 9 – 23 partners have been identified and 19 partners were trained:</p> <p>1)Four Rivers Cultural Center Ontario; 2)Communities in Action, Ontario – trained7/14/14; 3) Oregon Child Development Center, Ontario – trained 9/12/14; 4)Community Connections of Northeast Oregon, LaGrande – trained7/15/14; 5) Treasure Valley Rental Owners Association, Ontario – trained 7/14/14; 6)Northeast Rental Owners Association, LaGrande – trained 7/16/14; 7) Community Action program of East Centreal Oregon, Pendleton – trained 7/17/14; 8) Oregon Affordable Housing Management Association; 9) Oregon Child Development Coalition – trained 9/11 and 9/12/14; 10) Malheur County DHS, Ontario – training 9/11/14; 11)Lane County Rental Owners Association – training 7/19/14; 12) Red Lodge Transition Services, Coffee Creek – trained</p> | <p>Task 9 - This is an on-going task and the FHCO is currently scheduling meetings with local organizations in non-entitlement areas of the state to increase their capacity to perform outreach and education. The organizations that have been contacted so far include: St. Helens Rural Organizing Project; PICUN, farm worker advocacy in Woodburn; Siletz Tribe; Healthy Start advocacy groups statewide; National Alliance for the Mentally Ill (NAMI) chapters throughout the state; Monmouth Tenant Association; Oregon Action in Medford; Independent Living Resource centers in Medford, Roseburg and Cave Junction; and the CAUSA Latino advocacy group, Four Rivers Cultural Center, Communities in Action, Oregon Child Development Center, Community Connections of Northeast Oregon, Treasure Valley Rental Owners Association, Northeast Rental Owner Associations. Community Action Program of East Central Oregon, Oregon Affordable Housing Management, Oregon Child Development Coalition; Malheur County; Lane County Rental Owners Association, Red Lodge Transition Services, Samaritan House Shelter,</p> |

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| | | | | | <p>Task 11 – Conduct a 2014 and 2015 fair housing poster contest for Oregon children in first through eighth grades, throughout Oregon.</p> | <p>8/14/14; 13) Samaritan House Shelter – trained 10/20/14; 14) My Sisters Place – trained 10/20/14; 15) Community Services Consortium, Lincoln City; 16) Legal Aid Services, Newport; 17) Providence Supportive Housing, Hood River – trained 10/29/14; 18) HADCO – trained 10/29/14; 19) Neighborworks Umpqua, Roseburg – trained 10/29/14; 20) Klamath Housing Authority, Klamath Falls – trained 11/3/14; 21) Klamath Housing Group, Klamath Falls – trained 11/3/14; 22) Lincoln County Board of Realtors – training 11/10/14; and, 23) Lincoln County ESD Help Center – trained 10/20/14.</p> <p>Task 11 – 2015 contest work has begun i.e. brochure and cover letter being printed; updating outreach list; preparing for bulk mailing, E-Blast and telephone outreach. Contest promotion will commence in January 2015.</p> | <p>My Sister’s place, Community Service Consortium, Legal Aid Service, Providence Supportive Housing; HADCO, Neighborworks Umpqua, Klamath Housing Authority, Klamath Housing group, Lincoln County Board of Realtors, Lincoln County ESD Help Center. Once the initial meetings are scheduled and conducted, the FHCO will set up trainings and follow-up meetings.</p> <p>Task 11 – In February 2013 fair housing poster materials were delivered to the Cities of Stanfield and Echo. GEODC also conducted a reading at the Echo Library on April 19, 2013 for children from 4-8 years old.</p> <p>Other - GEODC participated in a forum on housing issues in Pendleton. 2015 contest work has begun i.e. brochure and cover letter being printed; updating outreach list; preparing for bulk mailing, E-Blast and telephone outreach. Contest promotion will commence in</p> |

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| | | | | | | | January 2015. |
| <p>B- Structural Barriers</p> <p>B(1)-. Need for more effective outreach and education methods, such as television and radio advertisements, seminars, webinars and other dissemination methods not currently utilized by the state, particularly in the non-entitlement areas of Oregon.</p> | <p>Increase knowledge of fair housing laws in Oregon.</p> | <p>Develop a methodology to measure results of education and outreach events and activities, including non-traditional outreach methods.</p> | <p>Evaluation of existing measures and suggestions for new approaches.</p> | <p>System for measuring effectiveness of outreach for future implementation .</p> | <p>Task 12 (a) - Conduct four meetings (semi-annual) with OBDD-IFA to further develop or implement the plan developed by FHCO on March 31, 2012.</p> <p>Task 12(b) - Develop a methodology to measure the results of education and outreach activities developed by FHCO on March 31, 2012. The new system will be implemented by December 31, 2015.</p> | <p>Task 12 (a) – OBDD and FHCO met on July 15, 2014. The FHCO has been providing Technical Evaluation of the proposals for completion of the state’s A/I, and participated in a kick-off meeting with the selected consultant on December 18, 2014.</p> <p>Task 12 (b) – FHCO evaluating use of Policy Map to track calls/intakes in geographic areas of state.</p> <p>FHCO submitted a HUD grant proposal that would support the use of an independent third party evaluator for this work – grant not awarded.</p> <p>The FHCO continues to consider appropriate methodologies. Training evaluations are analyzed but this methodology does not</p> | <p>Task 12 - Methodology was completed in 2012.</p> <p>Task 12(a) - OBDD and FHCO met on July 15, 2014. The FHCO has been providing Technical Evaluation of the proposals for completion of the state’s A/I, and participated in a kick-off meeting with the selected consultant on December 18, 2014.</p> <p>Task 12 (b) - FHCO evaluating use of Policy Map to track calls/intakes in geographic areas of state. HUD grant for the work was submitted and not awarded. The FHCO continues to consider appropriate methodologies. Training evaluations are analyzed but this methodology does not provide an effective technique for measuring effectiveness of training. FHCO is reviewing hotline activity and geographic areas to determine if this is a better indicator or training impact.</p> |

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| | | | | | | provide an effective technique for measuring effectiveness of training. FHCO is reviewing hotline activity and geographic areas to determine if this is a better indicator or training impact. | |
| <p>B- Structural Barriers</p> <p>B(1)- Need for more effective outreach and education methods, such as television and radio advertisements, seminars, webinars and other dissemination methods not currently utilized by the state, particularly in the non-entitlement areas of Oregon.</p> | <p>Establish a strategic communication plan to increase knowledge of fair housing laws in Oregon.</p> | <p>The development of a strategic statewide communication plan to increase knowledge of fair housing laws in the non-entitlement areas of Oregon.</p> | <p>Better educated community members and partners.</p> | <p>The development of a statewide strategic plan for future implementation .</p> | <p>Task 14 - Further work on the development and/or implementation of the strategic statewide communication plan will be addressed in the fair Housing Collaborative Meetings, under Task 10 below.</p> | | <p>Task 14 - Strategic Plan was completed on March 31, 2012.</p> <p>Between the FHCO and GEODC, it is estimated, that there was a gain of an additional 500 clients based upon listserves, flyer distribution and training sessions. This gain is projected to be based upon the increased fair housing awareness through the efforts of GEODC in Eastern Oregon, under this contract</p> |
| <p>C - Rental Markets</p> <p>C(1)- Refusal to allow reasonable accommodations</p> | <p>Enhance outreach and education activities to increase understanding of common</p> | <p>The development of a plan to increase understanding of common discriminatory actions seen in the rental</p> | <p>Better educated housing consumers and providers.</p> | <p>The development of a statewide plan for future implementation .</p> | <p>Task 3 - Expand bank of video and photographic materials to enhance virtual tours of historic discrimination and present tours to at least 10 non-entitlement jurisdictions.</p> | <p>Task 3 – Identified,-obtained photographs and videotaped interviews to incorporate Japanese Americans who worked in farm labor camps in Eastern Oregon during World</p> | <p>Task 3 - Plan was completed in 2012. OBDD-IFA is now contracting to complete actions identified within that plan. The development of a curriculum/training materials and agenda for workshops on</p> |

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| <p>C(2)- Discrimination against Section 8 voucher holders.</p> <p>C(3)- Discriminatory terms and conditions in the market place.</p> <p>C(4)- Discriminatory refusal to rent.</p> | <p>discriminatory actions seen in the rental markets.</p> <p>Enhance outreach and education activities to consumers to overcome the two types of discriminatory activities (refusal to allow reasonable accommodation and discrimination against Section 8 voucher holders) identified in rental markets.</p> | <p>markets within the non-entitlement areas of the state. This plan must emphasis the outreach and education activities that will take place to assist consumers in overcoming the discriminatory activities of: refusal to allow reasonable accommodation; and, discrimination against Section 8 voucher holders in non-entitlement rental markets.</p> | | | | <p>War II. Met local historians in Ontario, La Grande and the Josephine County Historical Society, along with obtaining materials and photos.</p> | <p>common discriminatory actions seen in rental markets, specifically overcoming denial of reasonable accommodations and discrimination against Section 8 voucher holders was granted an extension to 2014.</p> <p>A new brochure “Fair Housing for Students” was developed and 3 fair housing workshops regarding common discriminatory practices were completed and are as follows: Pendleton – August 20, 2012, where there were 8 attendees; Medford – September 11, 2012, where there were 19 attendees; and, Portland – October 2, 2012 (Includes a bus tour), where there were 28 attendees.</p> <p>GEODC provided 4 trainings in Pendleton, La Grande (August 20, 2012) , Wallowa; Vale (September 18, 2012); Ontario (June 11, 2013) with emphasis on tenant rights and landlord responsibility.</p> <p>Identified,-obtained photographs and videotaped interviews to incorporate Japanese Americans who worked in farm labor camps in Eastern Oregon during World War II. Met local historians in Ontario, La Grande and the Josephine County Historical Society, along with</p> |

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| | | | | | <p>Task 7 – Continue to update FHCO website to expand the knowledge, awareness and support of fair housing laws, enforcement avenues, and protections for citizens of the State.</p> <p>Task 8 - Coordinate with the Community Action Partnership of Oregon and the statewide network of adult care home providers to provide focused efforts on educating consumers about fair housing discrimination, reasonable accommodation, and section 8 protections as provided by HB2639. Conduct at least 4 webinars and assist with reasonable accommodation requests.</p> <p>Conduct at least 6 fair housing tours to non-entitlement areas. Each tour will consist of a series of workshops targeting target housing consumers, housing providers, social service providers and advocates, elected officials, land use staff</p> | <p>Task 7 – In 2014 the web site updates are on-going. During 2014 there were a total of 1,460,823 hits.</p> <p>Task 8 – In 2014, started working with adult foster care home licensors to revise written materials.</p> <p>Four tours have been completed: 1) July 14-17, 2014 with 3 trainings conducted: Ontario (7/14/14) – 17 participants, Pendleton (7/17/14) – 5 participants and LaGrande (7/16/14) – 12 participants; 2) September 11-14, 2014 with 2 trainings</p> | <p>obtaining materials and photos.</p> <p>Task 7 - In 2013 there were 197 Tweets, 224 Facebook posts and 78 articles distributed. In 2014 the web site updates are on-going. During 2014 there were a total of 1,460,823 hits.</p> <p>Task 8 – Prior work on this task is reported under B-Structural Barriers (B-1) above.</p> <p>In 2014, started working with adult foster care home licensors to revise written materials.</p> <p>Four tours have been completed: 1) July 14-17, 2014 with 3 trainings conducted: Ontario (7/14/14) – 17 participants, Pendleton (7/17/14) – 5 participants and LaGrande (7/16/14) – 12 participants; 2) September 11-14, 2014 with 2 trainings conducted in: Ontario (9/11/14) – 10 participants and</p> |

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| | | | | | of local non-entitlement jurisdictions, and others. | conducted in: Ontario (9/11/14) – 10 participants and Ontario in partnership with the Mexican Consulate (9/14/14) – 500 participants; 3) Lincoln County (10/14/14); and, 4) Lincoln County (11/14/14). | Ontario in partnership with the Mexican Consulate (9/14/14) – 500 participants; 3) Lincoln County (10/14/14); and, 4) Lincoln County (11/14/14). |
| <p>B- Structural Barriers</p> <p>B(3) – Need to develop a more effective referral system.</p> | Increase knowledge of fair housing laws in Oregon by continued support for the fair housing hot line and complaint referral program. | Continued support for the fair housing hot line and complaint referral program. | Better educated housing consumers and providers. | Number of calls received on the hot line, and the number referred to BOLI, HUD or other entities. | Task 13 - Screen at least 700 clients from Oregon’s non-entitlement jurisdictions with inquiries (calls/walk-ins/emails) and evaluate for fair housing issues and jurisdiction. It is anticipated that 15 calls will result in fair housing intakes, requiring further investigation, follow-up action, or formal complaint processing. | Task 13 – in 2014 there has been 377 hotline calls and 35 intakes processed. | <p>Task 13 - A total of 2381 calls have been received from non-entitlement communities throughout the state and 71 intakes were processed.</p> <p>GEODC responded to calls and e-mails on fair housing issues in Eastern Oregon.</p> |
| <p>Other</p> <p>Participation in the Fair Housing Collaborative</p> | | | | | Task 10 - Plan and hold 2 meetings to include representatives of Statewide Fair Housing Collaborative to review the state’s Fair Housing Action Plan and progress on achieving goals of the Plan. | Task 10 – There have been 2 collaborative meetings: 1) 7/28/14 for the purpose of identifying and creating a plan for producing the new A/I and Action Plan; and 2) 12/18/14 for the A/I kick-off meeting with the selected consultant. | <p>Task 10 - An extension for this task was granted. This work will be included in the scope of work for the 2013 contract.</p> <p><u>In 2014</u> – There have been 2 collaborative meetings: 1) 7/28/14 for the purpose of identifying and creating a plan for producing the new A/I and Action Plan; and 2) 12/18/14 for the A/I kick-off meeting with the selected consultant</p> |

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| Other January 1, 2014 – December 31, 2015 contract. | | | | | <u>Task 15</u> – Contract executed April 2014. | <u>Task 15</u> – Contract executed April 2014. | <u>Task 15</u> – Contract executed April 2014. |

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IFA continues to:

1. Disseminate fair housing information via the CDBG listserv to all interested persons and grant recipients.
2. Carry-forward and implement new requirements from 2011 – 2013, requiring submission of reasonable accommodation policies when becoming a certified subgrantee; the submission of limited English-proficiency Language Access Plan (LAP) before the first draw for non-construction funds; and, increased fair housing activities before the first draw and prior to the grant being administratively closed.
3. Participate in the Fair Housing Collaborative, comprised of OHCS, Bureau of Labor and Industry (BOLI), IFA, FHCO, and other private and public sector participants to address statewide fair housing issues. This collaborative was part of the reason for the successful completion and development of the 2011-2015 AI to Fair Housing Choice and Fair Housing Action Plan.
4. Support local fair housing efforts by continuing to work closely with all CDBG grant recipients to ensure that each jurisdiction recognizes their responsibilities in this area and knows what resources are available to answer questions and provide necessary brochures, posters, and presentations.
5. Have regional coordinators remain in contact with each grant recipient through the course of the CDBG-funded project and provide assistance when necessary. Local fair housing efforts include and are not limited to publicizing fair housing laws, participating in local fair housing events, displaying posters, distributing brochures and sponsoring of the FHCO display and training sessions.

In addition to the activities described above, CDBG funds extend publicly-owned infrastructure to new affordable low and moderate-income housing, which assists in addressing the obstacle of funding for owner-occupied single family housing. CDBG funds also are used by low and moderate-income homeowners to rehabilitate the homes they occupy.

CDBG funds were used to foster affordable housing by funding supportive public infrastructure for housing projects. CDBG funds, through the housing rehab program, support maintenance of affordable housing that is owned and occupied by a low and moderate-income homeowner.

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AP-85 Other Actions

Regulation Citation(s): 24 CFR 91.220(k), 91.320(j), 91.420

Actions planned to reduce the number of poverty-level families

CDBG funds are used for microenterprise assistance, which provides general classroom training for low and moderate-income entrepreneurs in developing microenterprises.

SP-80 Monitoring

Regulation Citation(s): 24 CFR 91.230, 91.330, 91.430

The state monitors every CDBG project at least once before administrative closeout. The monitoring reviews the grant recipient's administration of the project to ensure proper management of federal funds, compliance with state and federal regulations, and documentation of program effectiveness.

Most projects, except Public Works Planning and Engineering grants, will be monitored on-site. The decision to monitor on-site versus a desk review is based on several risk factors: program complexity, local grant administration capacity, recent problems with the project, past monitoring findings and projects with high-risk activities. High-risk activities include projects that generate large amounts of program income, housing rehabilitation projects, and projects that are behind schedule significantly.

The state has developed a monitoring checklist that enables staff to monitor projects consistently. Monitoring, whether on-site or desk review, is scheduled to coincide with various phases of the implementation of the project. After the monitoring is complete, the recipient receives a letter outlining any areas of concern or findings that need to be addressed and areas where the recipient has performed well. Concerns are not a violation of federal law or regulation but include areas that need attention before a problem occurs. Findings include non-compliance with federal laws, regulations, or a specific condition of the grant contract. Failure to respond to a finding will result in sanctions.

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**HOME
Administered by OHCS**

AP-15 Expected Resources

Regulation Citation(s): 24 CFR 91.220(c)(1, 2), 91.320(c)(1, 2), 91.420(b)

The HOME program receives federal funds to further the development of housing to meet the needs of low and very low-income individuals and families. Table L shows the expected 2015 allocation for the HOME program and Table M details the percentage of those funds targeted to individual OHCS projects.

Table L - HOME Expected Resources

| PROGRAM | SOURCE | USE OF FUNDS | ANNUAL ALLOCATION | PROGRAM INCOME |
|---------|---------------|-----------------|---------------------|----------------|
| HOME | Federal (HUD) | See table below | \$ 5,997,570 | \$0 |

Table M - Specific Uses of HOME Funding

| HOME SPECIFIC USE | PERCENT OF TOTAL FUNDING | FUNDING ALLOCATED | PROGRAM NARRATIVE |
|---|--------------------------|--------------------|--|
| Multifamily Rental Housing | 61% | \$3,658,518 | Acquisition, rehabilitation, and new construction of multifamily housing projects. |
| Community Housing Development Organizations (CHDO) Operating Support Grants | 5% | \$299,878 | Operating grants to certified Community Housing Development Organizations in the process of developing HOME funded housing projects. |
| Tenant Based Rental Assistance (TBRA) | 24% | \$1,439,417 | Rental assistance to eligible tenant families. |
| OHCS Administration | 10% | \$599,757 | Program administrative activities |

Sources Available to Leverage HOME Funding

Multifamily Rental Housing

The table below details additional forms of investment provided by OHCS through the 2014 competitive NOFA.

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Table N - Leverage of HOME Funds

| PROGRAM | FUNDING | NOTES |
|---|---|---|
| General Housing Assistance Program (GHAP) | \$5,200,000 | State program Gap financing |
| Low Income Housing Tax Credits (LIHTC) | \$8,949,892 (credit allocation) | Federal Tax Credits Section 42 Program |
| HELP | \$600,000 | Non-federal State program |
| Oregon Affordable Housing Tax Credits (OAHTC) | \$16,000,000 (interest rate reduction) | State Program offers reductions in interest rates in private financing |
| Low Income Weatherization Program (LIW) | \$3,000,000 | State Program reimburses for energy saving measures that exceed requirements of state building code |
| Emergency Housing Account (EHA) | \$2,205,837 | Leverage specifically for TBRA |
| Low Income Rental Housing Fund (LIRHF) | \$228,852 | Leverage specifically for TBRA |

HOME program regulations require a 25 percent nonfederal match for all HOME funds used for affordable housing and rental assistance. Eligible HOME match includes:

1. Cash contributions from public or private entities
2. Grant equivalent of a below-market rate loan
3. Present value of waived taxes or fees
4. Value of donated land
5. Cost of investment in on-site or off-site infrastructure
6. State Low-Income Rental Housing Fund (LIRHF) utilized in conjunction with HOME TBRA

AP-20 Annual Goals and Objectives

Regulation Citation(s): 24 CFR 91.220(c)(3) and (e), 91.320(c)(3) and (e), 91.300(c), 91.420

HOME funds are intended for the development of decent and affordable housing for low- and very-low income households. Oregon’s annual goal is to increase the availability of decent affordable housing through acquisition and rehabilitation, new construction, preservation of housing with project-based rental assistance and TBRA with the objective of providing decent housing for Oregon’s most vulnerable populations.

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Objective: Decent Housing

Table O – HOME Goals and Objectives

| DESCRIPTION | 2015 EXPECTED OUTCOMES |
|---|---|
| Fund preservation, new construction, or acquisition/rehab multifamily housing projects. | Fund four rental housing projects and complete four previously funded projects. |
| Fund Community Housing Development Organizations (CHDO) operating support grants. | Fund five Community Housing Development Organizations (CHDOs) with \$40,000 each in operating support grants. |
| Community Action Agencies (CAAs) provide very low income households the benefit of rental assistance and refundable deposit payments. | Assist 600 eligible households with HOME Tenant-Based Rental Assistance. |

AP-25 Allocation Priorities

Regulation Citation: 24 CFR 91.320(d)

OHCS identified the following 2015 allocation priorities for HOME program funds:

- Develop multifamily housing opportunities by adding to and improving the number of units of affordable housing in the Balance of State areas.
- Protect low-income tenants at risk of losing their homes from becoming homeless by providing TBRA through the Community Action Agency (CAA) network.

AP-30 Method of Distribution

Regulation Citation: 24 CFR 91.320(d) and (k)

The state is committed to investing public resources in a way that makes the best use of the funds while considering all benefits to the community and the viability of the project.

Financing for multifamily development is allocated through an annual competitive NOFA process. There were two NOFAs established in 2014. One combines HOME funds with federal Low Income Housing Tax Credits (LIHTC) and other funding sources, and a second that allocates HOME with other funds not including LIHTC.

The two NOFAs were open to eligible nonprofit and for-profit organizations. Fifteen percent of the annual HOME allocation is reserved for housing to be owned, developed, or sponsored by state certified CHDOs.

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In 2014, a 35 percent set-aside was established to fund preservation projects; those existing federally financed projects where at least 25 percent of existing units have project-based rental assistance at risk of loss.

NOFA applications must meet established thresholds of readiness, capacity, integrity, costs, and compliance in order to be considered for funding. If the application passes the threshold requirements, a committee scores the competitive portion of the application based on the five areas listed below:

1. Need
2. Impact
3. Preferences
4. Financial Viability
5. Capacity

The scoring criteria are designed to measure the severity of need, and overall impact to the community. The criteria is also devised to prioritize projects that best meet established preferences, demonstrate dynamic partnerships and outcome-based service delivery, and involve sponsors, owners, and management agents who have demonstrated high levels of performance.

One hundred maximum points are possible for each NOFA application scored. Both quantitative and qualitative factors are considered in the scoring. The measures vary slightly between the HOME only NOFA and the LIHTC with HOME NOFA. The primary criteria and areas scored for each section are as follows:

NEED CRITERIA:

Target Population, Severity of Need, and Underserved Geography

IMPACT CRITERIA:

Local Preference, Plan Alignment (connections between the proposed project and established local, regional, or state published plans), HOME Leverage in Business Oregon (for LIHTC projects), State Initiative/Policy Alignment, Appropriate Services, Collaboration and Innovation in Service Provision, Location Efficiency, Ownership Efficiency

Preservation Project Impact criteria:

Tenant Impact, Risk of Loss, Prudence of Investment, Plan Alignment, HOME Leverage in Balance of State, Appropriate Services, Location Efficiency

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PREFERENCE:

Serving Lowest Incomes, Qualified Census Tract (QCT) or De-concentrating Poverty, Qualified Allocation Plan (QAP) Preference (LIHTC only)

FINANCIAL VIABILITY:

Development Pro Forma Review, Operating Pro Forma Review, Reasonable request and demonstrated need for resources, Well Documented and Explained Construction Costs, Explained Exit Strategy at Year 15

CAPACITY:

Owner, Sponsor, Management Performance, Readiness to Proceed

AP-35 Projects

Regulation Citation(s): 24 CFR 91.220(d), 91.420

OHCS is unable to identify upcoming HOME projects at this time because the NOFA process will not award allocations until late 2015.

AP-50 Geographic Distribution

Regulation Citation(s): 24 CFR 91.220(f), 91.320(f), 91.420

OHCS is committed to ensuring public resources are invested in a way that is both geographically equitable and responsive to the diversity of low-income housing needs around the state. LIHTC funds are allocated to four geographic regions across the state: Portland Metro HUD HOME Participating Jurisdictions (PJ), non-Metro HUD HOME PJs, and Balance of State. State HOME funds are dedicated exclusively to the Balance of State.

HOME funding may be awarded to any project located throughout the Balance of State, based on the following criteria:

Underserved Geography:

- Need distribution – The percentage of the state’s severe rent burdened and low-income renter households in each city or county.

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- Affordable housing inventory – The sum of the city and county funded affordable housing units.
- Underserved Geography Calculation compares the actual distribution of the affordable housing units to how the affordable housing units would be distributed using the Need Distribution calculation.

HOME TBRA

HOME TBRA is distributed through HOME program subgrantees: local CAAs, non-profits, and Public Housing Authorities (PHA). Approximately 24 percent of HOME funds are allocated to TBRA to serve households at or below 50 percent median family income. Allocations are determined using a formula established by a strategic needs analysis that factors in the percentage of cost-burdened and poverty level households.

Each HOME TBRA subgrantee must develop a Tenant Selection Policy (TSP). The TSP identifies all populations receiving a preference or priority for assistance by the subgrantee, and describes the criteria by which households will be selected for program participation. The TSP must align with the service area’s housing needs identified through a recent needs assessment or a local governmental plan. OHCS may also require subgrantees to develop policies that give priority to persons with special needs or disabilities. Such a requirement would first be described in the AAP.

TSPs must be approved by OHCS at the beginning of each biennium. The subgrantee may request revision of the policy throughout the funding period if needed. For subgrantees whose service area includes more than one county, each county’s needs study may indicate a different need, requiring the subgrantee to develop more than one TSP. The table below outlines those counties served by each subgrantee and the TBRA funds allocated to those counties.

HOME multifamily rental housing does not limit beneficiaries or give preferences to a particular segment of the low-income population, other than what is required by the HOME program.

OHCS has not identified any limitation of beneficiaries of HOME TBRA funds nor given preference to any particular segment of the low-income population. OHCS requires subrecipients to provide a Tenant Selection Policy or Plan with their funding application. OHCS allows subrecipients to develop their own priority selections. The subrecipient’s policy, or plan, must show that their decisions are supported by an analysis of community needs and/or local governmental preferences, and that their tenant selection priorities do not violate nondiscrimination requirements.

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Table P - HOME TBRA Subgrantee Funding

| SUBGRANTEE | COUNTIES SERVED | HOME TBRA ALLOCATION (PROGRAM FUNDS) |
|---|---|--|
| Aging Community Coordinated Enterprises & Support Services (ACCESS) | Jackson | \$194,753 |
| Community Action Program of East Central Oregon (CAPECO) | Gilliam, Morrow, Umatilla, Wheeler | \$62,039 |
| Community Connection of Northeast Oregon (CCNO) | Baker, Grant, Union, Wallowa | \$45,917 |
| Community in Action (CINA) | Harney, Malheur | \$10,940 |
| Community Services Consortium | Benton, Lincoln, Linn | \$157,328 |
| Klamath Lake Community Action Services (KLCAS) | Klamath, Lake | \$63,046 |
| Lane County Human Services Commission (LCHHS) | Lane | \$157,328 |
| Mid-Columbia Community Action Council Authority (MCHA) | Hood River, Sherman, Wasco | \$33,538 |
| Mid-Willamette Valley Community Action Agency (MWVCAA) | Marion, Polk | \$144,086 |
| Neighbor Impact (NIMPACT) | Crook, Deschutes, Jefferson | \$154,162 |
| Northwest Oregon Housing Authority (NOHA) | Clatsop, Columbia, Tillamook | \$89,100 |
| Oregon Coast Community Action (ORCCA) | Coos, Curry | \$77,585 |
| Oregon Human Development Corporation (OHDC) | Statewide farm worker and specialized populations | \$19,864 |
| United Community Action Network (UCAN) | Douglas, Josephine | \$162,942 |
| Yamhill Community Action Partnership (YCAP) | Yamhill | \$66,789 |

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AP-55 Affordable Housing
 Regulation Citation(s): 24 CFR 91.220(g), 91.320(g), 91.420

Table Q - One-Year Goals for Affordable Housing by Support Type

| ONE-YEAR GOALS FOR THE NUMBER OF HOUSEHOLDS SUPPORTED THROUGH: | HOUSEHOLDS |
|--|------------|
| Rental Assistance | 600 |
| Production of New Units | 98 |
| ONE-YEAR GOALS FOR THE NUMBER OF HOUSEHOLDS SUPPORTED THROUGH: | HOUSEHOLDS |
| Rehab of Existing Units | 140 |
| Acquisition of Existing Units | 85 |
| Total | 883 |

Table R - One-Year Goals for Affordable Housing by Support Requirement

| ONE YEAR GOALS FOR THE NUMBER OF HOUSEHOLDS TO BE SUPPORTED | HOUSEHOLDS |
|---|------------|
| Homeless | 500 |
| Non-Homeless | 350 |
| Special Needs | 33 |
| Total | 883 |

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AP-60 Public Housing

Regulation Citation(s): 24 CFR 91.220(h), 91.320(j), 91.420

The state does not administer public housing. Public housing projects; however, may apply to the NOFA annually. PHAs designated as “troubled” work directly with HUD to resolve issues.

AP-75 Barriers to Affordable Housing

Regulation Citation(s): 24 CFR 91.220(j), 91.320(i), 91.420

In 2015, the state will help remove or address the negative effects of public policies that serve as barriers to affordable housing. The state encourages the production of high quality, affordable homes to meet the need of Oregon’s low- and moderate-income residents. The state’s effort to address barriers to affordable housing include changes to the competitive process for allocation of HOME funds, a newly established legislative workgroup that addresses affordability and access, and statewide planning goals of Land Conservation and Development Commission (LCDC) to address housing needs of Oregonians.

Competitive NOFA

In 2014, OHCS determined the need to transform its NOFA process to better meet the needs of its stakeholders and improve allocation of federal and state resources (e.g., HOME and LIHTC) for affordable housing.

Changes to the NOFA process include changing geographic regions to correlate with the Governor’s Regional Solutions Team (RST) regions, which are the Portland Metro Region, non-Metro PJs, and Balance of State. This avoided the need to create a floor of funding for regions where the allocation formula would not provide enough resources to fund a single project. This distribution will also make it easier for similar project types to compete with one another more closely and provide leverage opportunities.

OHCS continues to prioritize projects that deconcentrate poverty, are located in a QCT, are in underserved areas, and/or serve the lowest incomes. Establishing priorities and set-asides provides sponsors greater transparency and OHCS the ability to tie initiatives and legislation directly to affordable housing.

These priorities will be established on an annual basis, stay in place for a minimum of two years, and be published in advance of all future NOFAs. The annual policy priorities are

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intended to provide sponsors greater transparency as well as have specific ties to active initiatives and legislation.

In 2015, the priorities are:

- Serve to reduce the number of children in foster care
- Provide re-entry housing for those recently released from prison

Workgroup on Inclusionary Housing Affordability, Balance, and Choice

The 2013 Oregon legislature established the Workgroup on Inclusionary Housing Affordability, Balance, and Choice to address the following goals:

1. Increased individual, family and household access to
 - a. Safe, decent, affordable housing
 - b. Opportunities such as schools and jobs
 - c. Housing choice
2. Decreased racial and economic segregation and disparities

The workgroup of housing leaders met throughout 2014 to develop recommendations that address these goals. The following list outlines progress to date:

1. Generate increased revenue to subsidize housing. Ideas include
 - a. New revenue to subsidize housing
 - b. Increasing the available of state housing tax credits
 - c. Additional bonds for housing development
2. Make development less costly, easier, and faster. Ideas include
 - a. Modifying construction standards, unit size, and materials
 - b. Modular construction
 - c. Land trusts
3. Local Strategies include
 - a. Modify land use, zoning, and urban renewal efforts
 - b. Allow for sharing of density across a broad area
 - c. Mandate allowance of small houses, micro apartments, and accessory dwelling units
 - d. Engage local jurisdictions in solutions
 - i. Refining inclusionary policy
 - ii. Consider greater opportunities for inclusionary housing

Progress of the workgroup is located at this website [Affordability, Balance and Choice](http://affordabilitybalancechoice.org/) or <http://affordabilitybalancechoice.org/>

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Development Commission Goals for Affordable Housing

The way in which communities apply land use regulations affect the availability of land for low income housing. The state LCDC oversees the local implementation of 19 Statewide Planning Goals that influence how local jurisdictions develop their comprehensive plans and zoning ordinances.

Goal 10 of the LCDC Planning Goals (Goal 10) calls upon local jurisdictions to have plans in place that meet the housing needs of the citizens of the state. It also encourages the availability of housing at price points and rent levels that compare to the financial capabilities of Oregon households.

AP-85 Other Actions

Regulation Citation(s): 24 CFR 91.220(k), 91.320(i), 91.420

Actions Planned to Address Obstacles to Meeting Underserved Needs

As a part of their grant agreements, subgrantees are responsible for identifying local households that are underserved and the actions they plan to take during the grant period to address their needs.

Subgrantees commonly identify homeless households as having underserved needs. These households include individuals and families who cannot secure or maintain affordable and safe shelter and lack a fixed regular residence or reside at nighttime in an emergency shelter or institution. Numerous homeless populations like veterans, youths, seniors, and disabled individuals have specific needs that require more intense specialized attention to resolve their homelessness.

Actions to Foster and Maintain Affordable Housing

OHCS provides tax credits and various funding to affordable housing developers. This process encourages creativity in the use of federal, state, and local government resources with public and private resources to meet the needs of communities.

OHCS administers the federal LIHTC program, a major funding source for development of affordable housing. Tax credits are leveraged with other state and federal funds through the competitive NOFA process, requiring one application for all resources available through OHCS. Oregon allocated approximately \$8.5 million in credits for 2014. OHCS also administers the non-competitive four percent tax credits used in conjunction with tax-exempt bonds.

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Actions to Address Fair Housing

The Code of Federal Regulations CFR Title 24.91.115 (a) requires the State to adopt a citizen participation plan that sets the state’s policies and procedures for public engagement during the development of the Consolidated Plan.

The Citizen Participation Plan must:

1. Encourage citizen participation, with particular emphasis on participation by persons of low- and moderate-income.
2. Provide citizens with reasonable and timely access to local meetings, information, and records relating to the grantee's proposed use of funds.
3. Provide technical assistance to groups representing persons of low- and moderate-income who ask for assistance in developing proposals.
4. Provide public hearings to obtain citizen views and to respond to proposals and questions at all stages of the community development program.
5. Provide timely written answers to written complaints and grievances.
6. Identify how the needs of non-English speaking residents are met in the case of public hearings.

In 2015, Oregon’s Consolidated Plan partners, OHCS, Business Oregon and OHA, will review the plan to assure that it adequately responds to federal requirements, while meeting each agency’s needs.

Oregon’s Fair Housing Enforcement Summit meets quarterly. Summit members include BOLI, FHCO, US Department of Justice (DOJ), and OHCS. The summit provides a forum where participants share their enforcement efforts, barriers encountered, and collaborate on strategic approaches to address barriers and work effectively to enforce fair housing laws in Oregon.

{ The 2011-2015 AI is available at [Analysis of Impediments](http://www.oregon.gov/OHCS/HD/HRS/CONSPLAN/Final_Oregon_Analysis_Impediments.pdf) }

http://www.oregon.gov/OHCS/HD/HRS/CONSPLAN/Final_Oregon_Analysis_Impediments.pdf

Based on the AI, the State developed a Fair Housing Strategic Action Plan (FHAP), Attachment B. The table below shows the fair housing activities the State is concentrating on during the 2011-2015 Consolidated Plan period.

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Table S: Fair Housing Activities 2011-2015

| ACTION ITEM | PRIORITY | TIMING | OUTCOME | MEASUREMENT |
|--|-----------------|---------------|---|---|
| 1. Renew efforts to have a broad-based active, involved Fair Housing Collaborative | High | Ongoing | Improved participation and involvement with Fair Housing Collaborative members | Conduct an average of four quarterly meetings per year over the five years and identify four mutually agreed upon action items |
| 2. Continue contracting for activities such as educational outreach, informative brochures and audit testing | High | Annual | Consistent effort to educate the public and community partners | Over the five year period: Host at least nine educational outreach events per year Distribute a minimum of 9,500 brochures Conduct an average of 450 audit tests per |
| 3. Develop a means of measuring results of outreach efforts | High | 2011 – 2012 | Evaluate existing measures and develop new approaches to outreach | Success of outreach efforts will be measured through quarterly reports, analysis, and satisfaction surveys, with the goal of identifying new approaches to outreach |
| 4. Continue the Fair Housing referral guide | High | Annual | Fair housing information will be easily accessible to citizens and partners | Distribution of at least 1,500 fair housing referral guides per year |
| 5. Initiate and maintain better communications with Oregon's fair housing enforcement arm, the Bureau of Labor and Industries (BOLI) | High | Ongoing | Coordination of enforcement efforts between Fair Housing Council of Oregon (FHCO) and Bureau of Labor and Industries (BOLI) | Increased collaboration between agencies responsible to maintain, sustain, and enforce fair housing regulations |
| 6. Review non-English speaking citizen participation requirements and make changes where needed | High | 2011 – 2012 | Revised Citizen Participation Plan Adopted Limited English Proficiency Plan (LEP) | Implementation of the LEP, including training for OHCS staff, outreach to affected partners, and creation of an annual report |
| 7. Conduct audit testing specific to reasonable accommodations | High | Annual | Improved approaches to education and enforcement | Establish and monitor baseline by conducting 20 accommodation-specific audit tests |

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OHCS and FHCO collaborate each year to address the impediments to fair housing choice identified in the AI. Below are some of the actions that will be taken by the State through an administrative grant with FHCO in 2015:

1. Conduct audit testing for lesbian, gay, bisexual and transgender (LGBT) discrimination throughout Balance of State areas, specifically for assisted living facilities, based on gender and sexual orientation.
2. Provide education and outreach activities for rental housing providers (e.g., publicly funded, conventional, PHAs, housing consumers, and social service advocates).
3. Provide fair housing training sessions for NOFA project sponsors, property management staff, staff from previously funded projects, and OHCS staff.
4. Create a model building code to ensure local housing, includes access for people with disabilities increasing options for individuals to age in place.
5. Intake and process complaints from clients in Balance of State areas
6. Provide Affirmatively Furthering Fair Housing (AFFH) forums in Eastern and Central Oregon.
7. Hold land use meetings with the DLCD and FHCO to discuss laws in Balance of State areas. These meetings will result in a report that summarizes the meeting results.
8. Distribute fair housing brochures to housing consumers, providers, government agency staff, and the public.
9. Provide mass media outreach activities that include public service announcements, radio interviews, television appearances, and outreach events in local communities.
10. Provide listening sessions in Balance of State jurisdictions to collect input from residents on fair housing concerns.
11. Provide fair housing newsletters, post articles to blogs that target fair housing issues, publish Face Book and Twitter messages, and contribute articles to other housing consumer and provider media outlets to expand the knowledge, awareness, and support of fair housing laws, enforcement avenues, and protection for citizens of Oregon.
12. Provide fair housing workshops that inform housing consumers, housing providers, social service providers, and advocates.
13. Develop and implement methodology to measure the results of education and outreach activities developed by FHCO.
14. Identify and train local fair housing resources to increase their capacity to perform education and outreach.
15. Expand video and photographic materials to enhance virtual tours of historic discrimination.

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16. Provide bus tours showing historic sites of housing discrimination outside the Portland Metro area.
17. Provide financial support for the FHCO hot line and complaint referral system.

Actions Planned to Reduce Lead-Based Paint Hazards

The state requires applicants of affordable housing projects, subgrantees, developers, and service providers to conduct work and deliver services in accordance with the Lead-Based Paint Poisoning Prevention Act and 24 CFR 570.487(c). Grant recipients, subgrantees, applicants, project owners, and any others who apply for, or receive, HUD funding, must certify compliance with applicable lead-based paint requirements as well.

The HOME TBRA program requires a visual assessment for lead-based paint hazards as part of the housing inspection if the unit was built before 1978 and a child under the age of six years lives in the unit. If a visual assessment reveals lead-based paint, the rental owner must complete paint stabilization, clean up, and clearance activities before allowing occupancy. Any program participant whose unit was built prior to 1978 will also receive a brochure titled, "Protect Your Family from Lead in Your Home." Renters must sign a receipt for the brochure that is kept on file. Subgrantees are required to inform the local health department about children at risk for lead-based paint poisoning.

Actions Planned to Reduce the Number of Families Experiencing Poverty

The state seeks to help families move out of poverty in ways that promote family self-sufficiency to the highest degree possible. The Oregon Prosperity Plan serves to engage state government with business, philanthropic, and non-profit organizations in an effort to increase prosperity for all Oregonians.

The Prosperity Agenda enhances the state's 10-Year Budget Plan and includes goals and strategies that create opportunities for prosperity in the following categories:

- Jobs and Economy
- Education
- Healthy People
- Public Safety
- Healthy Environments
- Service Delivery Redesign

For each of the categories above, critical strategies, measurements, and outcomes have been identified. During the 2015 planning period, OHCS will focus on housing strategies to increase access to safe and affordable housing that meets basic needs and provides supportive

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services that allow people to reach their full potential. This includes targeting capital investments to the longest period of stable housing that meets HUD affordability and safety standards.

All multifamily rental developments funded with HOME funds are required to develop and implement a Resident Services Plan. The plans must describe how, through coordination, collaboration, and community linkages, residents will be provided the opportunity to access appropriate services that promote self-sufficiency, maintain independent living, and support making positive life choices.

Plans should incorporate appropriate services to address residents' issues. Many PHAs offer Family Self-Sufficiency (FSS) programs and collaborate with Individual Development Account (IDA) programs to assist eligible clients to build long-term personal assets.

OHCS oversees implementation of the IDA program. These services are administered through a unique partnership with the Oregon IDA Initiative, Neighborhood Partnerships, and our public and non-profit partners across the state.

IDAs help eligible households move out of poverty through asset development. The IDA program allows participants to build assets one of five ways:

1. Save for homeownership
2. Start or expand a small business
3. Access higher education
4. Repair their homes
5. Purchase technology or equipment that will help them secure or retain employment

Participants in the program are required to complete financial-education classes and save to meet their goals. Participants' savings are matched by funds generated from the sale of tax credits.

Proceeds from public and private donations are matched with savings from participants to build the financial resiliency of households. Further, because the credit remains at 75 percent of donations, the credit provides more resources than a direct expenditure. The amount of credits granted has continued to rise since 2001. Contributions to Neighborhood Partnerships totaled \$10 million in both 2012 and 2013.

Between January 2008 and June 2014, more than 7,000 Oregon residents opened IDAs, setting aside personal savings of over \$15 million during that time. Upon successful completion of all program requirements over the next one to six years, the participants will have funds to match their savings to purchase their first home, obtain needed postsecondary education, or

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start a small business. The Oregon IDA Initiative has supported over 3,500 participants in purchasing those lifelong assets with IDAs and currently has thousands saving more actively.

Actions Planned to Develop Institutional Structure

In December 2012, Governor Kitzhaber called upon OHCS to develop a new model of governance for joint efforts with community partners to deliver housing and housing stabilization programs. The foundation of this initiative was the recognition that health, education, and safety reforms in Oregon’s 10-Year Plan benefit from a solid housing delivery model. The goal was to transform and transition to an approach that is streamlined, integrated with other services, focused on outcomes, and more effective.

During 2013 and 2014, OHCS engaged a wide spectrum of government, non-profit, business, and civic leaders to discuss transitioning the housing delivery model and moving Oregonians experiencing poverty to economic security and prosperity. This planning culminated in a set of broad recommendations to the Governor and Legislature:

Refocus the agency on the full housing continuum, simplify program administration, streamline operations, and facilitate local and regional prosperity efforts.

Create an advisory commission on housing policy to integrate the housing continuum ensuring linkage to prosperity-related issues across state government, research-driven policy priorities, and increased accountability for outcomes that help shift state government delivery models away from dependency and toward self-sufficiency.

Continue to drive alignment and coordination throughout state government and foster an environment of inter-dependence between the state and its partners.

See [OHCS transition](#) for more information.

Actions Planned to Enhance Coordination between Public and Private Housing and Social Service Agencies

OHCS offers the Bridge to Home program funded by HOME TBRA in which CAAs and local PHAs work together to provide interim rental assistance for households on housing authority wait lists. To qualify, at least one member of the household must be disabled, the household must be Medicaid-eligible and must be on the Housing Choice Voucher Program (HCVP) waiting list. The household receives rental assistance through Bridge to Home until they obtain a HCVP voucher or are deemed ineligible for the HCVP program.

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SP-80 Monitoring

Regulation Citation(s): 24 CFR 91.230, 91.330, 91.430

The OHCS Asset Management (AM) section monitors each HOME property to ensure that sponsors meet the program requirements and comply with grant or loan agreements. The HOME property owner is responsible for the ongoing compliance of HOME program regulations and standards during the period of affordability. Marketability of the property and asset management are both essential compliance components. AM staff review and approve all new management agreements and attachments (e.g., leases, house rules, tenant selection criteria) to ensure HOME program compliance. In addition, HOME rent increases and changes in management require prior approval by OHCS.

On-site property reviews are conducted on an ongoing basis throughout the period of affordability to determine if the property meets the appropriate property standards and verify information submitted by the owners regarding rent, occupancy, and unit mix. Properties are inspected in accordance with HUD regulations and the Uniform Physical Conditions Standards (UPCS). The first on-site inspection for newly funded properties will occur within 12 months of project completion, and based on a risk assessment of each individual property the on-going inspections will occur every one, two, or three years. If any deficiencies are identified for any inspectable items, a follow-up on-site inspection will be conducted within 12 months. For non-hazardous deficiencies either an on-site inspection will be completed or third party documentation will be accepted as proof of correction (such as a paid invoice for work completed). Health and safety deficiencies identified during inspections are required to be corrected immediately. Properties identified with health and safety deficiencies are put on a more frequent inspection schedule. For properties with one to four units, the inspectable items for each building with HOME-assisted units and 100 percent of the HOME units are inspected. For properties with more than four HOME-assisted units, the inspectable items for each building with HOME-assisted units and at least 20 percent of the HOME-assisted units in each building, but not fewer than four units in each property, and one HOME-assisted unit in each building will be inspected.

An annual desk audit is completed for each HOME property as well. Audits verify the owner's certification of compliance through the Certification of Continuing Program Compliance (CCPC) process. By certifying compliance, owners certify that HOME-assisted units comply with program regulations. Owners are required to maintain records that demonstrate compliance through submission of a HOME monitoring report via the CCPC on an annual basis, at the time of inspection, or when requested by a compliance officer. Owners of HOME-assisted units, or their representatives, are required to perform annual inspections of the units. Individuals performing

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inspections apply the required property standards of HUD and HOME program regulations and OHCS handbooks and memorandums as guidance.

OHCS verifies that all units occupied by HOME TBRA recipients are inspected on an annual basis to the applicable property standards listed in 24 CFR 982.401, and before a rental contract is signed.

Properties constructed prior to 1978 may be subject to requirements for assessment, evaluation, and mitigation of lead-based paint, per federal regulation 24 CFR Part 35. OHCS compliance officers determine if monitoring for lead-based paint is required and if necessary, implement, or advise property owners of monitoring requirements.

Property owners are required to establish initial and ongoing tenant eligibility using the current HUD Handbook in combination with HUD's published annual income and rent limits. OHCS compliance officers review at least 20 percent of the tenant files for those tenants living in HOME-assisted units. File audit standards are detailed in 24 CFR Part 5. Additional HOME compliance expectations and guidance are written in the OHCS HOME Compliance Manual located on the OHCS website.

Additional support, for owners and management agents, is provided through training by OHCS. OHCS offers three to four trainings a year at conferences and other large industry meetings. Smaller group trainings occur an average of six times a year. Compliance officers provide additional one-on-one training to agents during property inspections as well.

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ESG
Administered by OHCS

ESG provides federal funds to support local programs in assisting individuals and families to quickly regain and retain stability in permanent housing after experiencing a housing crisis or homelessness.

ESG funds are available for five program components: street outreach, emergency shelter, homelessness prevention, rapid re-housing assistance, and data collection through the Homeless Management Information System (HMIS).

AP-10 Consultation

Regulation Citation(s): 24 CFR 91.110, 91.300(b), 91.315(l)

Continuum of Care (CoC) Consultation

Homelessness results from a wide range of issues. Coordination of federal government, state, regional, local governments not-for-profits, and concerned community members, wraparound services, and service providers work together to provide homeless individuals and families the full range of services needed to become self-sufficient. The state encourages local governments to use a CoC approach in addressing the multiple needs of the homeless. Under the CoC model, local government, service providers, and community action agencies provide a range of services necessary to address the varied needs of homeless individuals and households.

Seven regional CoC entities provide services throughout the state's 36 counties, 28 of which are covered by the Rural Oregon Continuum of Care (ROCC). The ROCC's Collaborative Applicant is the Community Action Partnership of Oregon (CAPO), the member association for all statewide CAAs. The remaining Balance of State agencies have designated either CAAs or county governments as their Collaborative Applicant. The ESG providers promote a consultative process that uses CAA and CAPO as primary conduits for communication.

At the community level, OHCS requires its grantees to participate in, and comply with their Continuum of Care centralized or coordinated intake and assessment system, including the local prioritization of special populations. Grantees are required, as part of their ESG funding application, to coordinate services with other providers, including those who serve the chronically homeless (mentally ill, those with addictions, etc.), families with children (TANF, Head Start, etc.), Veterans (VASH providers, Veterans' Service Branch offices, etc.), and unaccompanied youth (RHY providers, DHS/Child Welfare). The majority of Oregon's 34 local 10-Year Homeless Plans target prevention services (at-risk population) for populations being discharged from correctional and mental health facilities, and those aging out of the foster care system. The plans reflect broad community representation including stakeholders from

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corrections, mental health, courts, Department of Human Services, Goodwill, public health, public safety, domestic violence providers, education, housing developers, public housing authorities, Native American tribes, elderly service providers, and persons experiencing homelessness. The coordination at the local planning level has, in many cases, been replicated by the county and regional continuums of care.

Informed by the local and regional communities; OHCS engaged in dialogue and planning at the state level to serve persons experiencing homelessness and at-risk of homelessness, veterans, transitioning youth, and families with children. In 2015, OHCS will continue to strengthen its partnership with the Department of Human Services/Self-sufficiency to implement the TANF funded Housing Stabilization Program. The program serves families with children, and requires coordination at the local level between ESG grantees and DHS branch offices. At the state level, we are comparing data collection and performance measures to identify opportunities for cross system analysis and, ideally, shared performance outcomes. To avoid duplication and align service coordination, we are continuing to address joint training needs, and the use of shared client assessments and plans.

In 2014, the state legislature designated additional document recording fees to serve and develop housing for homeless and veterans at-risk of homelessness. The development and prioritization of programs has been done in partnership with the Department of Veterans' Affairs, and a broader stakeholder advisory group. Additionally, OHCS has regular communication with the Balance of State CoC to share information regarding prioritization, performance measures, and program/HMIS standards. This work will be expanded to include coordination of Rural Oregon Continuum of Care's (ROCC) Supportive Services for Veteran Program (SSVP) with OHCS's veteran's program.

OHCS staff has been invited to participate on the Washington County CoCs Mental Health & Special Needs Community Consortium Steering Committee. The Committee is another opportunity for consultation regarding special needs populations and barriers to, and opportunities for housing. Additionally, OHCS will receive and provide consultation regarding youth through staff participation on the DHS 5 Year Planning Youth Transition Programs planning workgroup, and the DHS Youth Advisory Committee.

Consultation and coordination specific to chronically homeless, has been difficult. Oregon is experiencing a severe shortage of rental housing, particularly for those with no or limited income, and special needs often experienced by the chronically homeless. Vacancy rates of one percent and less have created a very competitive market where landlords are less inclined to house the chronically homeless. Consequently, ESG grantees have shifted their focus to prevention and serving at-risk homeless populations. Knowing that serving the chronically

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homeless is a priority for the CoCs, OHCS will increase efforts to solicit information to identify successful strategies to be used to inform ESG funding for this priority population.

OHCS will build upon its current consultation with its CoC network utilizing four primary strategies:

1. CoC presentations and/or COC applicant agency meetings
2. Stakeholder surveys
3. CoC participation in ESG subgrantee biennial funding application review process
4. CoC workgroups as needed

OHCS staff will provide annual presentations to CoC providers covering topics such as ESG funding formula, client utilization and performance data, service prioritization and Point in Time (PIT) data. OHCS will collect feedback to determine barriers and opportunities for stronger alignment with CoC needs assessments, prioritization and performance measures. A CoC stakeholder survey will be conducted to determine the extent to which each CoC has developed a coordinated or centralized intake system and ESG service standards. The survey will also inform distribution by OHCS of state discretionary funds to support the further development of the CoC governance, operational structures, and systems.

OHCS contracts with the Housing Bureau of Portland for HMIS administration, and is the HMIS grantee for the balance of state (the ROCC). OHCS staff meets regularly with the ROCC members and staff to develop and implement HMIS funding policies and procedures. Oregon's statewide data collection and reporting is aligned with HUD standards. Based on HUD requirements for CoCs, OHCS plans to expand its data collection and reporting for performance measures and universal data elements.

OHCS will request CoC participation in the review of ESG subgrantee funding applications for the 2015-17 biennium funding cycle. This review will align ESG funding activities with CoC identified needs and priorities and further increase ESG subgrantee engagement in CoC operations.

AP-15 Expected Resources

Regulation Citation(s): 24 CFR 91.220(c)(1, 2), 91.320(c)(1, 2), 91.420(b)

OHCS expects to receive a 2015 ESG allocation of \$1,742,295. Approximately \$1,611,623 will be allocated as program funds, using the ESG program formula, to 16 subrecipients. Program funds may be used for street outreach, emergency shelter operations and essential services, homeless prevention, rapid re-housing, and data collection. OHCS will monitor subrecipients' projected budgets to ensure that no more than 60% of program funds are used to pay outreach

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and shelter costs. The remaining funds will be allocated for program administration--\$87,115 for OHCS administrative costs and \$43,557 for grantee administrative costs.

Oregon has a strong tradition of supporting the goal to end homelessness. In addition to the ESG program, Oregon funds its Emergency Housing Assistance (EHA) and Statewide Homeless Assistance Program (SHAP) programs. For the 2013-2015 biennium, the state Legislature authorized \$9,995,469 for these two programs. ** ESG has no program income available to budget for the 2015 plan year.

ESG subgrantees are expected to provide 100 percent match consisting of documented resources in the following match source categories:

- Other Federal Funds
- State Government
- Local Government
- Private Funds

Subgrantees must submit a Master Grant Agreement (MGA) work plan and budget every two years to be eligible for ESG funding. The MGA is a contractual mechanism for allocating homeless funds (both federal and state) to the network of CAAs. The budget is based on actual allocations and each subgrantee must identify other funding to augment the ESG program at the local level.

OHCS verifies the match-qualified funds. For those agencies who request a match waiver, OHCS calculates the estimated match for the program as a whole and determines if OHCS will grant a waiver. OHCS requires subgrantees to document all qualified match funds provided during the program year. Subgrantees submit the match dollar amounts with each Request for Funds (RFF). OHCS compliance staff verify eligibility of match funds by documentation in the subgrantee's files.

In 2015, OHCS anticipates matching funds to be consistent with the FY 2014 funding as follows:

Table T - ESG Leverage Funds

| | |
|----------------------------|-------------|
| Other Federal Funds | \$640,220 |
| State Government | \$1,138,892 |
| Local Government | \$373,536 |
| Private Funds | \$132,037 |
| Total anticipated match is | \$2,284,685 |

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Eligible Cash Sources

Except for HOME TBRA, matching contributions may come from any other source, including federal, state, local, and private sources. 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
- 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

Eligible Non-Cash Sources

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 at a rate determined by OHCS. OHCS may consider exceptions on a case-by-case basis in consultation with the subgrantee.

OHCS's ESG program does not generate program income.

AP-20 Annual Goals and Objectives

Regulation Citation(s): 24 CFR 91.220(c)(3) and (e), 91.320(c)(3) and (e), 91.300(c), 91.420

OHCS uses ESG funds to conduct outreach, identify sheltered and unsheltered homeless persons as well as those at risk of homelessness. ESG funds are primarily used to provide services to help homeless persons quickly regain or retain permanent housing.

Objectives:

- **Provide decent housing for individuals and families at-risk of homelessness:** The ESG program funds and administers homelessness prevention activities, as well as related services, to alleviate potential homelessness and provide low-income households with the support services necessary to obtain housing stability.
- **Provide a suitable living environment for homeless individuals and families:** The ESG program funds and administers emergency and transitional shelter programs and rapid re-housing programs that include related services to alleviate homelessness and provide low-income households with the supportive services necessary to build self-sufficiency.

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Outcome Goals:

- Increase availability and accessibility of decent housing by developing and implementing homelessness prevention activities including legal services, mediation programs, and short-term rent subsidies for individuals and families at-risk of homelessness.
- Increase availability and accessibility by providing essential services to the homeless including rent assistance, employment, physical health, mental health, substance abuse, and educational services.

Expected Outcomes:

Table U below shows that OHCS anticipates serving 9,000 individuals during the 2015 program year in the following categories:

Table U - ESG Outcomes

| | |
|---------------------|-------|
| Homeless Prevention | 755 |
| Essential Services | 3,985 |
| Rapid Re-Housing | 687 |
| Emergency Shelter | 2,800 |
| Street Outreach | 773 |

Outcomes Measures:

Table V below shows the street outreach, emergency shelter, prevention goals, and rapid rehousing for the 2015 program year.

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Table V - ESG Outcome Measures

| ACTIVITY DESCRIPTION | PERFORMANCE OBJECTIVE | PERFORMANCE OUTCOME | OUTCOME MEASURES | PERFORMANCE INDICATORS |
|--|------------------------------|--------------------------------|--|--|
| Street Outreach Engagement Services Case Management Linkage to Emergency Services (e.g. health, mental health, transportation) Domestic Violence Services | Suitable Living Environment | Availability/ Accessibility | 1,545 unsheltered homeless persons receiving outreach services | 464 unsheltered homeless persons receiving outreach services exit to shelter, temporary or permanent housing |
| Emergency Shelter Essential Services Shelter Operations | Suitable Living Environment | Availability/ Accessibility | 5,600 homeless persons provided emergency and transitional shelter | 1,680 homeless persons transitioning to temporary or permanent housing |
| Prevention Housing Relocation and Stabilization Services | Decent Housing | Availability/ Accessibility | 1,030 homeless persons receiving prevention services | 824 homeless persons receiving prevention services retain or transition to permanent housing at program exit |
| Rapid Re-Housing Housing Relocation and Stabilization Services | Decent Housing | Availability/ Accessibility | 825 homeless persons receiving supportive services | 660 homeless persons receiving rapid re-housing services to transition to permanent housing at program exit |

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Addressing objectives:

ESG objectives will be addressed by

1. Reducing chronic homelessness
 - a. Providing shelter
 - b. Direct provision of or referral to services to address medical conditions, mental illness, substance abuse, emergency funds, job training and placement
2. Reducing poverty
 - a. Providing services that help chronically homeless persons
3. Providing rental assistance to support affordable housing for special populations
 - a. Providing and coordinating services to the homeless
 - b. Supporting community and economic development
 - c. Addressing the needs of homeless and chronically homeless population

AP-25 Allocation Priorities

Regulation Citation: 24 CFR 91.320(d)

Reasons for Allocation Priorities

There are three factors included in the state ESG allocations:

1. Severe Housing Burden (30 percent): households spending 50 percent or more of their household income on housing. Data comes from the U.S. Census Bureau's American Community Survey (ACS) 5 year dataset.
2. Economically Disadvantaged/Poverty (45 percent): population living below the federal poverty level (FPL); data comes from the annual poverty estimates from the Census Bureau's Small Area Income and Poverty Estimates program.
3. Homeless Count (25 percent): population enumerated through the state annual PIT count and includes those staying in emergency shelters, transitional housing, receiving rent/mortgage assistance to prevent homelessness, those people turned away from shelters, and people counted through the street count. A two-year average of the annual count data is used in the formula.

Individuals living in poverty and those with extreme rent burden are most likely at risk of homelessness and in need of homelessness prevention activities. Individuals in the Point-In-Time (PIT) homeless counts are those currently experiencing homelessness and in need of services. The three variables identify and allocate resources to households in need of ESG services, with the objective of providing decent housing and a suitable living environment.

CAAs set allocation priorities based on the local needs, data, and the written standards described in the ESG Operations Manual, Attachment C.

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OHCS developed statewide minimum ESG standards within the areas identified in 24 CFR 576.400 (e) (3), and no longer requires grantees to establish their own. The standards were originally submitted to HUD in response to the 2014 monitoring, but have since undergone minor revisions. As part of the 2015 funding application, grantees were required to provide written verification that they would comply with the state standards (which will be documented during OHCS’s program monitoring). Grantees, who wish to develop more restrictive standards, or need to comply with ESG relevant CoC standards, must submit their standards for OHCS review and approval. We anticipate a small number, if any, grantees who will propose more restrictive agency standards. The ESG standards may be found on page six of the ESG Operations Manual. The entire manual may be accessed at the following link:

<http://www.oregon.gov/ohcs/CRD/hss/manual-emergency-solutions-grant.pdf>

Table W - ESG Allocation Priorities

| ACTIVITY | FY2014 FUNDS TO BE EXPENDED IN REPORTING YEAR 2015 | AVERAGE PERCENTAGE OF ACTIVITY BUDGET TO WHOLE BUDGET |
|---------------------|---|---|
| Rapid Re-Housing | \$281,418 | 35.28% |
| Homeless Prevention | \$239,492 | 30.02% |
| Emergency Shelters | \$140,836 | 17.66% |
| Administration | \$58,829 | 7.37% |
| Data Collection | \$42,825 | 5.37% |
| Street Outreach | \$34,284 | 4.3% |
| Total FY2014 Funds | \$797,684 | 100.0% |

OHCS monitors and provides technical assistance to subgrantees to ensure appropriate activities are carried out locally and that no more than 60 percent of the total OHCS allocation is used for Street Outreach and Emergency Shelter activities in compliance with 24 CFR Part 576. OHCS regularly consults with the seven continuums receiving ESG funding to maintain consistency with state and local 10-year plans to prevent and end homelessness.

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AP-30 Method of Distribution

Regulation Citation: 24 CFR 91.320(d) and (k)

Each subgrantee must submit an MGA work plan specifying how ESG funds are used. The work plan is designed to demonstrate the organization's capacity to carry out the eligible activities of homelessness prevention, rapid re-housing, emergency shelter, outreach, administration, and the HMIS. OHCS encourages collaborative applications with service and housing providers. Funds are awarded to subgrantees based on the MGA work plan. Work plans must demonstrate capacity to provide needed services within HUD guidelines. OHCS reserves the right to allocate funds below the formula allocation and/or redistribute funds based on capacity to deliver eligible services.

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AP-35 Projects

Regulation Citation(s): 24 CFR 91.220(d), 91.420

OHCS has no ESG projects at this time.

Obstacles to Addressing Needs

The two primary obstacles to addressing the needs of homeless persons remain the overall lack of resources and affordable housing units. Local communities report that low rental vacancy rates and increasing rents and housing deposits contribute to the lack of affordable housing. OHCS has also identified the following potential obstacles to addressing the underserved needs:

- Lack of transportation
- Limited employment opportunities
- Lack of available services in rural communities

AP-50 Geographic Distribution

Regulation Citation(s): 24 CFR 91.220(f), 91.320(f), 91.420

Subgrantees must address the following in their MGA work plan:

- Provide evidence that ESG funding is being used in alignment with local homeless plans and community needs including population targets, service strategies, and performance measures.
- Provide documentation of locally developed or adopted ESG service standards that meet HUD requirements.
- Describe their efforts in the development and utilization of the CoC centralized or coordinated in-take system.
- Describe how outreach is administered to homeless and at-risk groups.
- Identify outcome measures determined locally used to gauge their community's effectiveness in achieving the goal of preventing and ending homelessness, in addition to performance measures required by OHCS.

Subgrantee ESG Distribution

ESG distribution of funds follows the allocation priorities described in AP-25 Allocation Priorities on page 60. The following table shows projected distribution of ESG funds to subgrantees for the year 2015.

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Table X - ESG Funds Distribution to Subgrantees

| SUBGRANTEE | GEOGRAPHIC AREA COVERED | TOTAL FY2014 FUNDS |
|---|--|--------------------|
| ACCESS | Ashland, Medford, and Jackson County | \$131,752 |
| Community Action of Oregon (CAO) | Beaverton, Hillsboro | \$79,945 |
| Community Action Partners of East Central Oregon (CAPECO) | Gilliam, Morrow, Umatilla and Wheeler Counties | \$46,511 |
| Community Action Team (CAT) | Columbia, Clatsop and Tillamook Counties | \$72,993 |
| Community Connections of Northeast Oregon (CCNO) | Baker, Grant, Union and Wallowa Counties | \$28,800 |
| Community in Action (CinA) | Harney and Malheur Counties | \$29,462 |
| Community Services Consortium (CSC) | Benton, Lincoln and Linn Counties | \$140,690 |
| Klamath Lake Community Action Services (KLCAS) | Klamath and Lake Counties | \$50,318 |
| Lane County (LC) | Springfield, Eugene, and Lane County | \$274,594 |
| Mid-Columbia Community Action | Hood River, Sherman and Wasco Counties | \$37,242 |
| Multnomah County (MULTCO) | Gresham and Multnomah County | \$102,787 |
| Mid-Willamette Valley Community Action Agency (MWVCAA) | Marion and Polk Counties | \$219,311 |
| NeighborImpact (NI) | Crook, Deschutes and Jefferson Counties | \$157,077 |
| Oregon Coast Community Action Agency (ORCCA) | Coos and Curry County | \$68,193 |
| United Community Action Agency Network (UCAN) | Douglas and Josephine Counties | \$155,256 |
| Yamhill Community Action Partnership (YCAP) | Yamhill County | \$60,249 |

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AP-65 Homeless and Other Special Needs Activities

Regulation Citation(s): 24 CFR 91.220(i), 91.320(h), 91.420

Oregon's goals and strategies for preventing and ending homelessness are a part of *A Home for Hope, The State's 10-Year Plan to End Homelessness.*

Below are the six goals and strategies identified in the plan:

Goal 1- Prevent and divert people from becoming homeless by working with them to obtain and keep their housing.

Goal 2- Expand, develop, and coordinate the supply of affordable housing and supportive services to prevent and end homelessness and shorten stays in shelters.

Goal 3- Build the capacity of homeless persons for self-support through strategies that identify their risk of homelessness and their needs and to access appropriate housing with appropriate supportive services.

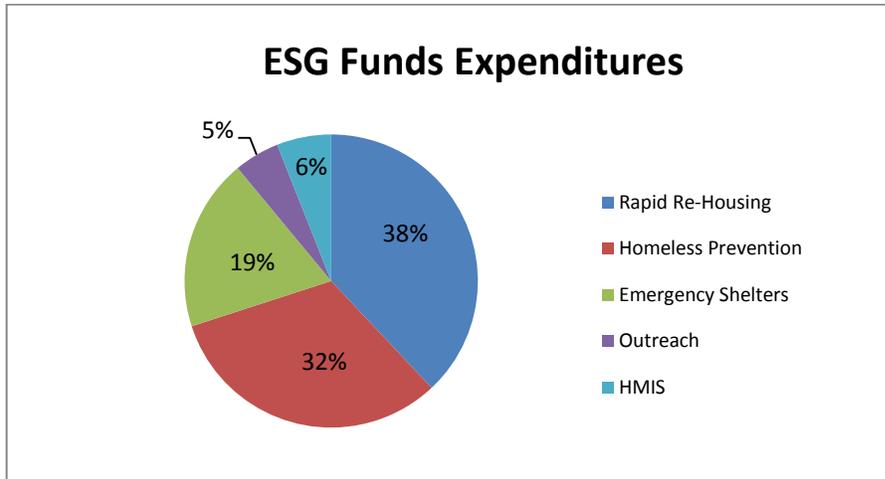
Goal 4- Identify and implement system improvements for coordination at the program funding and delivery levels leading to measurable results.

Goal 5- Implement education and public awareness campaigns to remove societal stigma about homelessness, and to build community support and coordinated responses.

Goal 6- Improve data collection technology and methodology to better account for homeless program outcomes.

Within these broad goals, OHCS partners with CAAs to address homelessness through local and regional 10-Year Plans to End Homelessness. CAAs identify the strategies and target populations, specific to local needs in the work plans. OHCS reviews and approves the work plans prior to allocating funds. The chart below depicts planned strategies and activities for the FY2015 ESG funding:

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Homeless and Other Special Needs Activities – AP-65

HOME multifamily rental housing does not specifically target homeless and other special needs populations. If projects targeting persons in this circumstance are proposed and if they are selected through the competitive NOFA process, they will receive a reservation of HOME funding.

OHCS is aligning with HUD’s priorities to broaden existing homelessness prevention activities and emphasize rapid rehousing of homeless persons. OHCS accepts subrecipients’ priority selections based on local needs assessments and homeless plans. In addition, OHCS has provided training to encourage subrecipients to provide rapid rehousing and has made the eligible uses of state funds as flexible as possible to assist with homeless prevention and rapid rehousing costs.

OHCS is working to gain consistency in project name identification and usage by requiring all subrecipients submitting funding applications for 2015 to provide a list of the naming conventions they use for HMIS data collection. HMIS data entry training manuals are being produced and will be available to HMIS users. Improved data collection will provide more accurate outcome results regarding current strategies for preventing and ending homelessness, and assist OHCS in making decisions about program effectiveness.

HOME multifamily rental housing does not specifically target homeless and other special needs populations. If projects targeting persons in this circumstance are proposed and if they are selected through the competitive NOFA process, they will receive a reservation of HOME funding.

The Oregon Health Authority’s OHOP program has in place a direct referral partnership with the Department of Corrections (DOC) to ensure persons living with HIV/AIDS who are released from prison are quickly linked to HIV related treatment and services necessary to assist them in transitioning successfully into the community, eliminating disruptions in HIV treatment. DOC referrals will be submitted to OHA and triaged to the appropriate HIV case management provider serving the area. HIV case managers will assist transitioning individuals with accessing health insurance and health care, housing, benefits and other supportive services. In addition,

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OHA's contracted HIV case management providers have in place community based referral networks to assist persons living with HIV transition from institutional settings. For example, HIV medical case managers receive direct referrals from local medical providers treating HIV positive individuals and often have direct communication with local jails and behavioral care facilities.

The Oregon Health Authority's HIV Care and Treatment Program administer the OHOP program, as well as the Ryan White Part B and the AIDS Drug Assistance Program. OHA continues to contract with health departments and non-profit organizations to provide HIV case management and supportive services to persons living with HIV regardless of the individual's participation in other public or private services. Case managers will conduct an assessment of need to determine what public or private benefits the individual is receiving and will provide information, referral and wrap around support to address identified barriers to stability and care.

Rapid Re-Housing

ESG funds (\$567,412) will be spent on Rapid Re-Housing activities that provide rent assistance, financial assistance, housing relocation, and stabilization services. These activities are provided to individuals, veterans, youth, and families with children including chronically homeless individuals and families. Most CAAs provide emergency or medium-term rental assistance coupled with case management and other services offered by the CAA or through the CAA's community partners.

Homeless Prevention

ESG funds (\$482,780) will be expended for Homeless Prevention activities; including rental assistance, financial assistance, housing relocation, and stabilization services for individuals or families with children who are at risk of homelessness. OHCS homeless prevention programs have an income limit of 30 percent and must meet the "at risk" of homelessness criteria as per HUD regulations. ESG funds used for prevention services keep clients in stable housing and decrease the demand on our limited emergency shelter network.

Emergency Shelters

ESG funds (\$283,930) will be dedicated for Emergency Shelter activities. These activities include essential services such as case management, childcare, education services, life skills training, and general shelter operations. Emergency shelter services are provided to homeless individuals and families, including those who are chronically homeless, veterans, unaccompanied youth and victims of domestic violence. In communities where there is no shelter facility, CAAs provide temporary shelter in local motels. CAAs also operate warming centers during extreme weather events.

Outreach

ESG funds (\$69,120) will be designated to expand outreach activities. These activities include street engagement, case management, and emergency health services where other

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health services are not available. These services are delivered to homeless individuals and families, including those who are chronically homeless, veterans, youth, and victims of domestic violence. Many CAAs perform outreach services in coordination with other non-profit agencies such as local faith-based and volunteer programs that operate in locations where homeless persons gather or camp.

HMIS

ESG funds (\$86,400) will be expended on HMIS activities including eligible staff time, equipment purchase and annual fees and licenses. Local CAAs use HMIS funds to ensure they are collecting supportive data per HUD Data and Technical Standards. HMIS provides a platform to improve the quality of data available for OHCS and other agencies to use in prioritizing future spending that identify obstacles to strategically meet and exceed targeted goals. In order to further refine and improve the ESG program OHCS will:

- Collaborate with CAPO to analyze information and data collected in 2013, 2014, and 2015 based on new performance measurements implemented in the 2013/14.
- Consult with Oregon’s seven CoC’s to discuss performance outcomes that respond to the identification and implementation of improvements to local homeless systems.
- Support and encourage the implementation of a centralized, coordinated assessment processes for client entry into local homeless systems throughout the state.
- Provide state support and funding to assist CoC’s to carry out Homeless Emergency and Rapid Transition to Housing (HEARTH) Act requirements. OHCS has provided funding for five of the CoC’s to further develop their centralized intake systems and other activities designed to ensure that HEARTH Act governance and operational requirements will be met.

AP-85 Other Actions

Regulation Citation(s): 24 CFR 91.220(k), 91.320(i), 91.420

Actions Planned to Address Obstacles to Meeting Underserved Needs

As a part of their grant agreements, subgrantees are responsible for identifying local households that are underserved and the actions they plan to take during the grant period to address their needs.

Subgrantees commonly identify homeless households as having underserved needs. These households include individuals and families who cannot secure or maintain affordable and safe shelter and lack a fixed regular residence or reside at nighttime in an emergency shelter or institution. Numerous homeless populations like veterans, youths, seniors, and disabled individuals have specific needs that require more intense specialized attention to resolve their homelessness.

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All ESG program participants receiving homeless prevention and rapid re-housing assistance are required to engage in case management housing stability activities that include employment, training, and skill development. ESG clients, who do not have a high school diploma or GED at time of program entry, are encouraged, and provided referrals and additional resources to assist in meeting these fundamental levels of academic achievement. It is a priority to assist Oregonians with securing affordable housing and other services necessary to make progress toward long-term housing sustainability and financial self-sufficiency.

AP-90 Program-Specific Requirements

Regulation Citation(s): 24 CFR 91.220(l), 91.320(k), 91.420

Written Standards

There are four categories of “homeless” that meet the eligibility requirements for assistance through the ESG program:

Category 1: Literally homeless: a Household that lacks a fixed, regular, and adequate nighttime residence, meaning:

Using a primary nighttime residence that is a public or private place not meant for human habitation (includes car, park, abandoned building, bus or train station, airport, or camping ground); OR

Is living in a publicly or privately operated shelter designated to provide temporary living arrangements; OR

Is exiting an institution where the Household has temporarily resided for 90 days or less; AND

Who resided in a shelter or place not meant for human habitation prior to entering the institution.

Category 2: Imminent risk of homelessness: A Household who will imminently lose their primary nighttime residence provided that:

The residence will be lost within 14 days of the date of application for homeless assistance by court order; AND

No subsequent residence has been identified; AND

The Household lacks the resources or support networks needed to obtain other permanent housing.

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Category 3: Unaccompanied Youth with Children Who Qualify as Homeless under Other Federal Statutes: Unaccompanied Youth under 25 years of age, with Children who do not otherwise qualify as homeless under this definition, but who:

Are defined as homeless under “other federal statutes” (see “Definitions” section of this manual); AND

Has not leased, owned, or rented a permanent housing space for at least 60 days prior to application for assistance; AND

Has had at least two moves within the past 60 days, prior to application for assistance; AND

Has one or more chronic disabilities (see “Definitions” section of this manual); AND

Has at least two barriers to employment (see “Definitions” section of this manual)

Category 4: Fleeing, or attempting to flee, domestic violence (as defined in Emergency Solutions Grant Operations Manual): a Household who:

Is fleeing, or is attempting to flee, domestic violence; AND

Has no other residence; AND

Lacks the resources or support networks to obtain other permanent housing

Other Federal Statutes:

Other Federal Statutes include:

- Runaway and Homeless Youth Act
- Head Start Act
- Subtitle N of the Violence against Women Act of 1994
- Section 330 of the Public Health Service Act (42 U.S.C. 254b)
- Food and Nutrition Act of 2008 (7 U.S.C. 2011 et seq.)
- Section 17 of the Child Nutrition Act of 1966 (42 U.S.C. 1786)
- Subtitle B of title VII of the McKinney-Vento Act (42 U.S.C. 11431 et seq.)

Centralized or Coordinated Assessment System

ESG grantees are required to participate in their local or regional CoC centralized or coordinated intake system. Oregon’s seven CoC’s are in the process of developing their centralized/coordinated intake systems. OHCS will support COCs ensuring the development of the coordinated intake systems for all regions through financial support and facilitation of

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network meetings and webinars where continuum staff can share experiences, challenges, and ideas to develop centralized or coordinated intake systems.

Process of Making Sub-Awards

Based on an existing formula, ESG funds are granted to statutorily identified subgrantee CAAs serving Balance of State areas of the state. OHCS enters into a MGA with each of its subgrantees, providing a contractual mechanism for allocating homeless funds (both federal and state) to CAPO. The subgrantee submits a work plan detailing their proposed use of ESG funds. Sub-awards between subgrantees and other service and housing providers are encouraged in order to promote a collaborative network at the local level. The MGA work plan application shows what ESG service components and activities grantees will provide including budgets outlining how sub-awarded funds will be expended.

Homeless Participation Requirement

OHCS supports the inclusion of homeless or formerly homeless individuals in the work CAA's do to prevent and end homelessness in their communities, including representation on CoC boards and special events such as Stand Down and Homeless Connect.

Performance Standards

In 2015, OHCS will use 2013 and 2014 HMIS performance data to determine the effectiveness of current strategies and priorities in reducing homelessness. OHCS will consult with CoCs to align performance benchmarks with effective homeless reduction strategies. OHCS will continue to join with the CAPO, and the Oregon State University Rural Studies Program, to refine and develop outcome-based poverty reduction performance measures for both rural and urban areas.

The current statewide housing stability measures and benchmarks will be enhanced with additional service data to provide a comprehensive view of Oregon's homeless service system including service barriers, geographic differences, appropriate targeting, prioritization of homeless subpopulations, and changing capacity needs.

Oregon has two levels of performance standards:

Programmatic standards

- 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
- Increased housing stability as measured by the percentage of program participants who transfer into permanent housing (those counted in the above) and maintain permanent housing for six months from time of program or project exit
- Increased access to and utilization of homeless services as measured by the number of persons and unduplicated households receiving ESG funded services

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Proposed activity standards

- Number of unsheltered homeless persons receiving outreach services who exit into shelter, temporary or permanent housing
- Total number of homeless persons receiving shelter services who transition into temporary or permanent housing
- Total number of homeless persons receiving prevention services who retain or transition into permanent housing at program exit
- Total number of homeless persons receiving rapid re-housing services who transition into permanent housing at program exit

SP-80 Monitoring

Regulation Citation(s): 24 CFR 91.230, 91.330, 91.430

OHCS will observe subgrantees receiving HUD funds by conducting risk-based monitoring that evaluates program progress, compliance, whether technical assistance is provided, and receipt of project status reports. The agency may withhold funds from subgrantees if the subgrantee's reports are incomplete, inaccurate, or not submitted timely. Risk-based monitoring is performed at least once every three years.

If grant funds are not obligated for reimbursement by the subgrantee in a timely manner, OHCS may reduce funding and redistribute the funds to other subgrantees. The agency may implement adjustments by modifying the Notice of Allocation (NOA).

Two basic types of monitoring are conducted by OHCS to verify compliance with the MGA and applicable laws and regulations.

1. Off-site desk monitoring is an on-going process that reviews the subgrantee's performance. The review process identifies issues that require immediate on-site monitoring. Materials used for this review include amendments and extensions to the MGA, project status reports, HMIS reports, requests for funds, and other supporting documents.
2. On-site monitoring is a structured review conducted by the agency at the subgrantee's offices. The review includes reviewing compliance with program guidelines and applicable laws, progress made toward program goals, and continued capacity to carry out the approved program.

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**HOPWA
Administered by OHA**

AP-15 Expected Resources
Regulation Citation(s): 24 CFR 91.220(c)(1, 2), 91.320(c)(1, 2), 91.420(b)

Table Y – Expected Resources - Priority

| Program | Source of Funds | Uses of Funds | Expected Amount Available | | | | Expected Amount Remainder of Con Plan Period | Narrative Description |
|---------|-------------------|--|---------------------------|----------------|----------------------|-----------|--|--|
| | | | Annual Allocation | Program Income | Prior Year Resources | Total | | |
| HOPWA | HUD | TBRA | \$274,207 (72.4%) | \$0.00 | \$137,062 | \$411,269 | \$125,650 | TBRA for 55 clients/households |
| | | Support Services: Housing Placement | \$29,540 (7.8%) | | | \$29,540 | \$0 | Support Services for 86 clients/households |
| | | Case Management | \$44,850 (11.8%) | | 10,650 | \$55,500 | \$0 | |
| | | Housing Information | \$18,946 (5.0%) | | | \$18,946 | \$0 | |
| | | Admin | \$11,367 (3.0%) | | | \$11,367 | \$0 | Administration |
| | Ryan White Part B | ADAP Services | \$69,420 | \$0.00 | | \$69,420 | Leveraged Services | |
| | | Case Management Support Services | \$119,800 | | | \$119,800 | Leveraged Services | |
| | State Funds | ADAP Services | \$393,380 | \$0.00 | | \$393,380 | Leveraged Services | |
| | | Energy Assistance | \$12,100 | | | \$12,100 | Leveraged Services | |
| | | Admin | \$61,944 | | | \$61,944 | Leveraged Services | |

HOPWA funding will be leveraged through additional resources. Federal Ryan White Part B funds and general state funds will provide households served with insurance assistance, case management services, and wrap around support services. Emergency utility assistance will be provided through the state’s Low-Income Energy Assistance Program. HOPWA has no match requirement, does not generate any program income, and will not use land or property that is publicly-owned.

AP-20 Annual Goals and Objectives
Regulation Citation(s): 24 CFR 91.220(c)(3) and (e), 91.320(c)(3) and (e), 91.300(c), 91.420

Oregon’s HOPWA program assists people living with HIV/AIDS in creating a continuum of stable, sustainable housing. The objective of HOPWA is to assist households in establishing and

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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. HOPWA promotes client housing stability and acts as a bridge to long-term assistance programs, such as Section 8, or to self-sufficiency.

Table Z – HOPWA Annual Outcomes and Goals

| OUTCOME MEASURE | 5-YEAR GOAL | 2015 |
|---|-------------|------|
| Number of households receiving TBRA | 130 | 55 |
| Number of households receiving Support Services: 1) Housing placement services 2) Housing case management to include coordination of benefits and housing stability planning 3) Housing information services | 200 | 86 |
| Total number of unduplicated households receiving assistance | 133 | 86 |
| Percent of households assisted with TBRA maintaining stable housing | 90% | 90% |
| Percent of households with a housing plan for maintaining or establishing on-going stability | 100% | 100% |
| Percent of households that had contact with a case manager at least once in the last three months | 100% | 100% |
| Percent of households that have medical insurance | 100% | 100% |
| Percent of households that obtained an income producing job | 25% | 25% |

AP-25 Allocation Priorities

Regulation Citation: 24 CFR 91.320(d)

HOPWA funds are distributed through a cooperative partnership with the OHA and are coordinated with Health Resources and Services Administration (HRSA), Ryan White Part B program resources. The goal of the program is to assist clients in achieving and maintaining housing stability to avoid homelessness and improve their access to, and engagement in, HIV related care and treatment. HOPWA funds are distributed outside the five-county Portland Metropolitan Statistical Areas (MSAs), through direct payment on behalf of participating clients.

HOPWA funded activities address program objectives by providing permanent supportive housing for persons living with HIV/AIDS and their families through rental assistance and supportive services, which include housing placement services, case management in the form of benefits coordination, and housing stability planning and housing information services.

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As the grantee, OHA works with community housing and social service partners and leverages additional program funding to provide a continuum of HIV services. OHA analyzes the needs of both existing caseload and waiting list clients, and addresses those needs through local resources, HOPWA, Ryan White, or other housing related resources. Referred clients are prioritized for assistance based on assessment of client need as determined by the Ryan White-funded HIV case manager and HOPWA-funded Housing Coordinator.

AP-30 Method of Distribution
Regulation Citation: 24 CFR 91.320(d) and (k)

OHA is the grantee for HOPWA formula funding and directly carries out program implementation. OHA does not administer the program through project sponsors. OHA utilizes a statewide, acuity-based waiting list to ensure people living with HIV, who have the greatest need for housing (Level #4), are served first. The following table describes levels of housing needs:

Table AA - Levels of Housing Need

| Level #2 | Level #3 | Level #4 |
|--|--|-----------------------------|
| Formerly independent family or individual temporarily residing with family or friends – projected time allowed to stay > 30 days | Formerly independent family or individual temporarily residing with family or friends but must leave within the next 30 days | Homeless per HUD definition |
| Housing is in jeopardy due to projected financial strain (>30 days); needs assistance with rent/utilities to maintain housing | Housing is in jeopardy due to immediate projected financial strain (<30 days); needs assistance with housing costs to maintain or find new housing | |
| Living in long-term (>1 mo.) transitional rental housing. | Living in temporary (<1 mo.) transitional shelter | |
| Client incarcerated (release date >3 mo.) | Client incarcerated (release date <3 mo.) | |
| | Eviction notice received (<30 days) | |

AP-35 Projects
Regulation Citation(s): 24 CFR 91.220(d), 91.420

OHA HIV Care and Treatment Program is the grantee and responsible for administering Balance of State HUD-funded HIV/AIDS programs (outside of MSA). As the grantee, OHA works with community housing and social service partners and leverages additional program funding to provide a continuum of HIV services. OHA analyzes the needs of both existing caseload and waiting list clients, and match those needs to available funding and program services. This

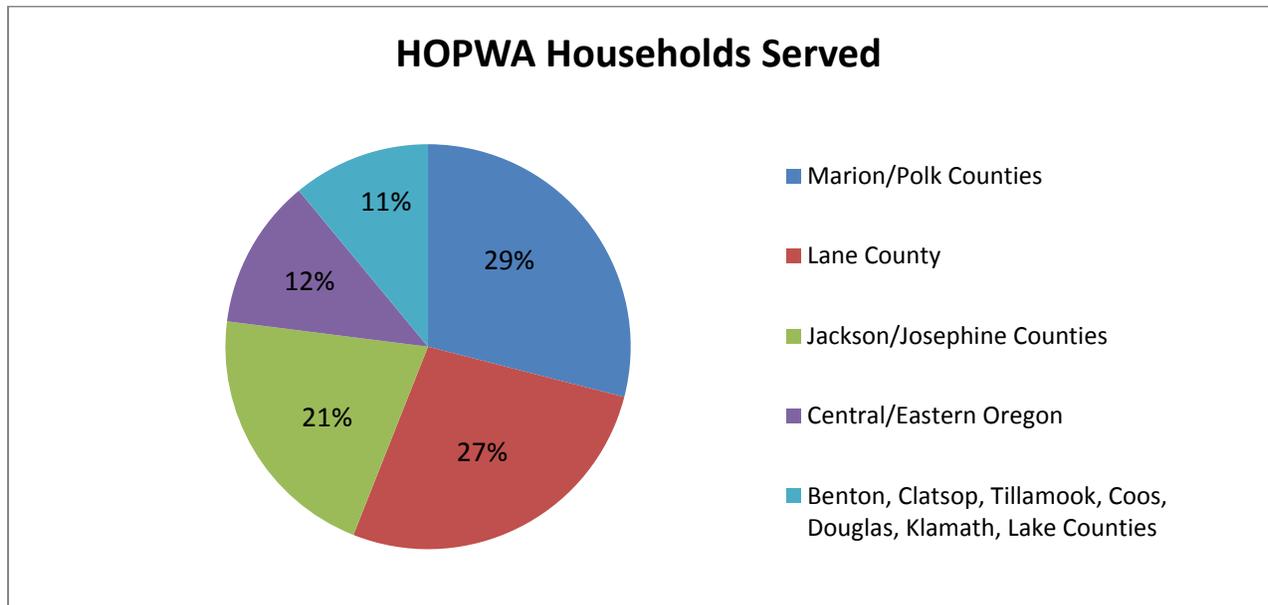
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process is used to allocate HOPWA funds to rental assistance and permanent housing placement services.

The primary obstacle to addressing needs remains the overall lack of resources as the HOPWA program continues to maintain a waitlist for long-term rental assistance. A secondary, but no less formidable obstacle, is continued community stigma directed towards persons living with HIV, who also experience multiple challenges, such as deteriorating health, mental illness, substance abuse, criminal history, and poverty.

AP-50 Geographic Distribution
Regulation Citation(s): 24 CFR 91.220(f), 91.320(f), 91.420

HOPWA funds are not distributed based on a set formula but rather based on client acuity. HOPWA funds are distributed through direct payment on behalf of participating clients and thus the exact geographic distribution of the assistance cannot be predicted. Referred clients are prioritized for assistance based on assessed client need with no regard for client’s geographic location. However, the distribution of resources is closely aligned with the HIV prevalence in the Balance of State. In 2013, the program served approximately 200 unduplicated households through all funding streams. The follow chart indicates geographic distribution:



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AP-70 HOPWA Goals
Regulation Citation(s): 24 CFR 91.220(l)(3), 91.320(k)(4), 91.420

Table AB – HOPWA Goals

| 1-YEAR GOALS FOR THE NUMBER OF HOUSEHOLDS TO BE PROVIDED HOUSING THROUGH HOPWA FOR: | |
|--|-----------|
| Short-term rent, mortgage, and utility assistance to prevent homelessness of the individual or family | 55 |
| Tenant-based rental assistance | |
| Units provided in transition short-term housing facilities developed, leased, or operated, leased, or operated | |
| Total | 55 |

Through multiple funding streams, to include HOPWA formula funds, the Oregon Health Authority’s OHOP program will provide supportive housing services to persons who are homeless or at risk for homelessness in order to ensure ongoing stability. In the next year the OHOP program will serve approximately 360 persons living with HIV/AIDS, which includes providing direct housing coordination services to include information and referral, deposit assistance, energy assistance and long term rental assistance to assist persons in accessing and retaining stable housing and support persons in HIV care. In addition, OHOP housing coordinators work closely with OHA’s contracted HIV case management providers throughout the state to provide approximately 1100 person’s living with HIV/AIDS in the balance of state with medical and psychosocial supports necessary to ensure access to and retention in HIV related care and treatment, to include Ryan White funded emergency and transitional housing assistance.

SP-80 Monitoring
Regulation Citation(s): 24 CFR 91.230, 91.330, 91.430

OHA administers the HOPWA program through four full time staff located in Bend, Salem, Eugene, and Medford. Staff conducts an annual file review for HUD and program compliance. This annual review includes client case and chart reviews as part of the HOPWA program Quality Management Plan, as well as an assessment of program database records to measure progress in meeting program objectives.

The review tool includes federal compliance criteria outlined in the Office of HIV/AIDS Housing HOPWA Grantee Oversight Resource Guide. Based on the annual review findings, program staff identifies one or two improvement activities. In addition, the HOPWA program conducted a client satisfaction survey in 2014 through Program Design and Evaluation Services. The survey results show 96 percent of survey respondents rated the overall program as excellent or good. Lastly, OHA holds quarterly face-to-face meetings that provide staff both training and policy review opportunities.

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Attachments

- A: CDBG Method of Distribution**
- B: Fair Housing Action Plan**
- C: ESG Operations Manual**
- D: Certification**
- E: Standard Form 424**
- F: Citizen Participation Documentation**