Oregon's Proposed 2017 Annual Action Plan

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Oregon's 2017 Proposed Annual Action Plan

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Executive Summary (AP-05)

The State of Oregon's Annual Action Plan is governed by 24 CFR 91.200. The 2017 Annual Action Plan is developed in accordance with those regulations and the guidance provided in the 2015 IDIS Desk Guide. This document will accompany the HUD IDIS submission.

The 2017 Annual Action Plan covers the second year of the 2016-2020 Consolidated Plan period.

A growing gap between the number of Oregonians who need affordable housing and the availability of affordable homes has given rise to destabilizing rent increases, an alarming number of evictions of low- and fixed- income people, increasing homelessness, and serious housing instability throughout Oregon. The state of Oregon is responding to this crisis by using every available tool at its disposal to help communities provide more stable housing to Oregonians with low incomes.

Oregon Housing and Community Services (OHCS) is the state agency with responsibility to work on these issues. OHCS' mission is to provide stable and affordable housing, and engage leaders to develop integrated statewide policy to address poverty and provide opportunity for Oregonians. OHCS provides housing development finance tools to developers of affordable rental housing. OHCS also has responsibility for administering housing stabilization resources through the Community Action network, including funds to address issues of homelessness, and provide energy and weatherization assistance. OHCS also administers programs which help Oregonians access affordable homeownership and avoid foreclosure; which is a critical strategy in this challenging and ever changing housing market. The ESG, HOME and HTF programs are used to fund these efforts. Under the leadership of Governor Kate Brown, and the collaboration of many community-based and private-sector partners, OHCS is working to extend its reach, and impact, across the entire continuum of affordable housing access and retention.

Oregon Health Authority (OHA) and Oregon Business Development Department-Infrastructure Finance Authority (OBDD-IFA) are important partners in this plan and in efforts to assist people who need stable housing, and in the rehabilitation of low-income housing units. While OHCS and OHA assess the housing development needs, OBDD-IFA assesses the non-housing community development needs. OBDD-IFA addresses these needs through economic development stimulation and addressing major deficiencies in public infrastructure. OBDD-IFA invests in projects within non-entitlement communities that enhances livability, retains and expands job creation, protects our water and sewer systems and builds community facilities for the benefit of the residents, of which the majority are low to moderate income.

2. Summarize the objectives and outcomes identified in the Plan

Oregonians are experiencing the housing crisis and slow growing economic recovery in different ways – including homelessness, increasing rent burdens, and a severe shortage of affordable and available housing:

- For housing to be considered affordable, a household should pay up to one third of their income towards rent, leaving money left over for food, utilities, transportation, medicine, and other basic necessities. Today, one in two Oregon households pays more than a third of their income towards rent, and one in four pays more than half of their income towards rent.
- More school children are experiencing housing instability and homelessness. In 2014-15, 21,214 K-12 school children were identified as experiencing homelessness at some point during the school year. This is a 12 percent increase over the 2013-14 school year data.
- Oregon has 27,000 rental units that are affordable and available to renters with extremely low incomes, and 130,000 households that need those apartments, leaving a gap of 103,000 units.
- Partners who work directly with Oregonians with low incomes report a growing experience of rising rents and housing costs, a limited supply of affordable housing, and increasing instability.
- Housing instability is fueled by an unsteady, low opportunity employment market. Over 400,000 Oregonians are employed in low wage work. Low wage work is a growing share of Oregon's economy. When wages are set far below the cost needed to raise a family, the demand for public services grows to record heights.
- Over one million Oregonians rely on food stamps Supplemental Nutrition Assistance Program (SNAP) and other assistance to feed their families.
- Women are more likely than men to end up in low wage jobs. Low wages, irregular hours, and part time work compound issues.
- People of color historically constitute a disproportionate share of the low wage work force. Forty five percent of Latinos, and 50 percent of African Americans, are employed in low wage industries.
- The majority of low wage workers are adults over the age of 20, many with a college degree or some level of higher education.
- Minimum wage in Oregon is $9.75. A minimum wage worker must work 68 hours a week, 52 weeks a year, to afford a two bedroom apartment at Fair Market Rents. Because Oregon's minimum wage has increased, the number of hours required to work to afford a two bedroom apartment decreased from 72 in 2016 to 68 in 2017.

There is a growing need for infrastructure investment to spur economic development and to keep Oregonians safe.

- Oregon has an unmet need of $4.4 billion in repairs and improvements to existing water and sewer systems exist throughout the state.
- Two thirds of the state's public drinking water sources and 35 percent of the state's septic systems are considered to be highly sensitive ground water sources.
- Retaining and expanding Oregon's community development and infrastructure needs will strengthen existing industry and attract new companies to invest in Oregon.

Stimulating economic opportunities, creating opportunities for safe and decent housing for all Oregonians and enhancing the livability of the state are the key objectives of the 2016-2020 Consolidated Plan.

3. Evaluation of past performance

2016 CAPER is under development. The necessary data to provide an evaluation of past performance will be included in the 2016 CAPER.

4. Summary of Citizen Participation Process and consultation process

The 2017 Annual Action Plan was submitted for public comment October 3, 2016 through November 1, 2016. A public hearing was held on October 17, 2016.

5. Summary of public comments

The 2017 Annual Action Plan is the second action plan in the 2016-2020 Consolidated Plan period. Oregon through OHCS, OBDD-IFA, and OHA, consulted with agencies, and housing and service providers across the state in the process to assess and identify the housing, health, and public service needs of Oregon's communities. Oregon placed particular emphasis on the needs of the non-entitlement jurisdictions of the state, while consulting with partners statewide, in the development of the 2016-2020 Consolidated Plan.

Oregon reached out and engaged an expansive list of stakeholders, including service providers, nonprofit agencies, advocacy groups, public housing authorities, city officials, for-profit developers, and the public, via roundtable dialogs, panel discussions, web-based surveys, websites, e-mails, focus groups, and through media outlets. In advance of the development of the Consolidated Plan, Oregon also completed the 2016-2020 Analysis of Impediments to Fair Housing Choice (AI). BBC Consulting was the principal author of the report, and provided supplemental consultation that is incorporated into this plan.

Events were publicized statewide though a combination of newspaper articles, advertisements, emails lists and partnerships with local agencies and nonprofits. The public comment period

and public hearing were publicized in newspapers of general distribution and in accordance with Oregon's Citizen Participation Plan.

Informal comments are included in the Appendix to this document, Attachments A-J, and are incorporated throughout the document. One formal comment was received for Oregon's Proposed Consolidated Plan Amendment. Public comments related to the 2016-2020 Analysis of Impediments to Fair Housing Choice (AI), are included in Attachment P, directly after the AI. Public comments related to the 2016 CDBG Method of Distribution (MOD) are included in Attachment R, directly after the MOD. An opportunity for public comment was also provided for both the 2016-2020 Oregon Citizen Participation Plan (CCP) and an amendment to the 2011-2015 Oregon Citizen Participation Plan, no comments were received.

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

This section will be completed after the Public Comment Period closes.

7. Summary

This section will be completed after the Public Comment Period closes.

Lead & Responsible Agencies (PR-05)

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

The following are the agencies/entities responsible for preparing the 2017 Annual Action Plan and those responsible for administration of each grant program and funding source.

The 2016-2020 Consolidated Plan for the state of Oregon and this Annual Action Plan were developed and completed in a partnership between Oregon Business Development Department-Infrastructure Finance Authority (OBDD-IFA), Oregon Health Authority (OHA), and Oregon Housing and Community Services (OHCS). Prior to developing the Consolidated Plan, the partners completed the Analysis of Impediments to Fair Housing Choice.

The contact information for the partner agencies is as follows:

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Consultation (AP-10)

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

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

The 2017 Annual Action Plan is for the second year of implementation of the 2016-2020 Consolidated Plan, which was approved on May 25, 2016. The plan was later amended to include the 2016 allocation of the National Housing Trust Fund and submitted for approval on August 16, 2016. The Amendment has not yet been accepted. The 2017 Annual Action Plan seeks to advance the priorities set for the Consolidated Plan and outlined by our partners.

To develop the Consolidated Plan and the subsequent action plans, the state of Oregon, through Oregon Housing and Community Services (OHCS), Oregon Business Development Department-Infrastructure Finance Authority (OBDD-IFA), and Oregon Health Authority (OHA), consulted with other agencies, and housing and service providers across the state in the process to assess and identify the housing, health, and public service needs of Oregon's communities. Oregon placed particular emphasis on the needs of the non-entitlement jurisdictions of the state, while consulting with partners statewide, in the development of the Consolidated Plan. Oregon used a roundtable dialogs, panel discussions, web-based surveys, websites, e-mails, focus groups, and through media outlets engage interested persons and partners.

In advance of the development of the 2016-2020 Consolidated Plan, Oregon also completed the 2016-2020 Analysis of Impediments to Fair Housing Choice (AI). BBC Consulting was the principal author of the report and provided supplemental consultation that has been incorporated into this plan.

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

In an effort to engage Continuums of Care (CoC) and those serving homeless people (particularly chronically homeless individuals and families, families with children, veterans, and unaccompanied youth), and people at risk of homelessness, OHCS staff traveled to Ontario, Coos Bay/North Bend, Klamath Falls, Tillamook, McMinnville, Medford, The Dalles, Hood River, Pendleton, and Redmond. Staff asked service providers about their top issues and priorities for services and housing needs, and how they worked together to effectively meet the needs of their communities. The primary focus, when performing this outreach, was to listen. The

information gathered at these sessions informed our work in developing both the strategic plan section of the Consolidated Plan and Oregon's statewide housing plan.

OHCS partners with the Department of Human Services (DHS)/Self-sufficiency program in the implementation of the TANF funded Housing Stabilization Program (HSP) which serves families with children, and requires coordination at the local level between ESG grantees and DHS branch offices. OHCS staff members were also part of an extensive DHS led planning effort to review and enhance the service system for youth transitioning out of foster care. Housing needs were discussed and addressed, both as a homelessness prevention and rapid re-housing strategy.

At the state level, to avoid duplication and align service coordination, OHCS identified opportunities for cross system analysis that ensures shared performance outcomes, and continues to address joint training needs, and the use of shared client assessments and plans.

OHCS staff participates on the Washington County CoC's 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 Homeless and Runaway Youth Advisory Committee.

ESG grantees shifted their focus to prevention and serving at-risk homeless populations due to Oregon's 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 property managers are less inclined to house people experiencing chronic homelessness. Because serving people experiencing chronic homelessness is a priority for the CoCs, OHCS will increase efforts to solicit information that identifies successful strategies to help inform ESG funding for this population.

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

Allocation of all homeless funds, including ESG, is based on formula. The formula data elements are regularly updated and reviewed by the Community Action network and its association, which are the state mandated homeless grantees. These grantees are also actively involved in leadership roles for their respective Continuums of Care. OHCS plans to initiate a review process that will include Continuums of Care representatives, and the Community Action network, to determine if the formula for distributing homeless funds, including ESG, needs to be revised and aligned with CoC priorities.

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 standards. Oregon submitted the standards to HUD in response to the results of Oregon's 2014 monitoring. As part of the 2015 funding application, grantees were required to provide written verification that they will 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 relevant ESG CoC standards must submit their standards for OHCS review and approval. OHCS anticipates a small number of grantees who will propose more restrictive agency standards. The ESG standards are included with this response and may be found on page six of the ESG Operations Manual at the following link http://www.oregon.gov/ohcs/CRD/hss/manual-emergency-solutions-grant.pdf.

OHCS utilizes the same HMIS data system used by Oregon's Continuums of Care. Policies and procedures for operation and administration of HMIS are determined by the Portland Housing Bureau in compliance with HUD requirements. OHCS contracts with the Portland Housing Bureau use ServicePoint (CoC chosen HMIS) to collect and report all state allocated homeless funded program data, and ESG program data.

OHCS is the Balance of State (ROCC) Continuum of Care's HMIS administrator. OHCS staffs have on-going meetings with ROCCs Coordinator to discuss alignment of ESG standards, data quality expectations and development of performance measures. OHCS recently allocated Emergency Housing Assistance discretionary funds to the Community Action Partnership of Oregon (CAPO--ROCC's applicant agency) to support further development of ROCC governance structure, project prioritization process, performance measures and other ROCC areas in need of development to meet HUD expectations. Community Services Block Grant discretionary funds will be provided to CAPO for the current fiscal year to align efforts with ROCC to provide training and technical assistance to community action agencies to improve and sustain compliance with data quality standards. The majority of HUD funded CoC projects and all state funded ESG projects are administered and implemented by the same community action agencies.

ESG funding is utilized within a homeless system of services funded by multiple state and federal funding sources. Several Continuum of Care funded projects utilize state funds to meet HUD match requirements. The integration of funding requires OHCS to develop system performance measures that ideally align with HUD's CoC required system performance measurements. Two performance measures we are currently measuring to determine appropriate performance benchmarks are: percentage of persons who exit to or retain permanent housing and percentage of persons who exited to permanent housing and retain permanent housing at six month follow-ups. Both of these measures are identical to or closely aligned with HUD's CoC System Performance Measures 7b and 2a. For the 2017-2019 biennium, we are determining which additional state and HUD measures we will add with the ultimate goal of replicating and/or aligning ESG performance measures with HUD's seven required system performance measures.

Continuum of Care consultation regarding ESG funding allocations and projects also occurs during the funding application process. ESG grantees are required to present their proposed ESG funded projects to their respective Continuum of Care for review and comment. Documentation of CoC review is required as part of the funding application. Additionally, consultation will occur as requested or needed such as Washington County's annual request to OHCS and our Washington County ESG grantee to provide a presentation to their entire CoC membership.

Preliminary planning is underway to determine the interest and need for OHCS to convene Oregon's Continuums of Care to evaluate and consider enhancing the Point in Time Count (PITC) process and data collection.

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

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

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

Table 1 – Agencies, groups, organizations who participated

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
2017 Annual Action Plan	Oregon Housing and Community Services	The Annual Action Plan seeks to achieve the goals outlined in the 2016-2020 Consolidated Plan Amendment. As described in this Action Plan, Oregon will pursue opportunities to advance the goals the CDBG, HOPWA, HOME, ESG and HTF programs.

Expected Resources (AP-15)

Assuming funding levels remain constant through 2020, over the course of the Consolidated Period Oregon will make the following HUD funds available through the four programs included in this plan:

- CDBG $ 60,278,895
- HOME $ 31,564,635
- HTF $ 3,000,000
- HOPWA $ 1,937,370
- ESG $ 8,865,285

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

These funding levels are estimated based on previous allocations. OHCS expects notice of our allocations in the spring of 2017. Consistent with Oregon's Citizen Participation Plan, if there is a variance in the allocation of less than 20 percent over the last five years, an additional public comment period will not be provided.

Anticipated Resources

Table 2 - Expected Resources – Priority Table

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan $	Narrative Description
			Annual Allocation: $	Program Income: $	Prior Year Resources: $	Total:$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	12,055,779	3,000	500,000	12,558,779	48,223,116	See the narrative description in the Appendix, Attachment A.
HOME	public - federal	Multifamily Acquisition Multifamily rental new construction Multifamily rental rehab TBRA, CHDO Operating Support Grants	6,312,927	0	0	6,312,927	25,251,708	OHCS focuses the HOME program on new construction, acquisition and rehabilitation of multifamily rental units, TBRA, and CHDO Operating Support Grants
HTF	public- federal	Multifamily Acquisition Multifamily rental new construction Multifamily rental rehab	3,000,000	0	0	3,000,000		HTF is a new affordable housing production program that will be leveraged with other federal and state funding. It will be made available through OHCS annual LIHTC and HOME NOFA as an additional source of funding for multifamily rental housing projects with units affordable to extremely low income households.

HOPWA	public - federal	Permanent housing in facilities Permanent housing placement Short term or transitional housing facilities Short-Term Rent, Mortgage and Utility Assistance Supportive services TBRA	387,474	0	112,141	499,615	1,549,896	
ESG	public - federal	Conversion and rehab of emergency shelters Financial Assistance Overnight shelter Rapid re-housing (rental assistance) Homeless Prevention Rental Assistance Services Transitional housing	1,773,057	0	0	1,773,057	7,092,228	OHCS includes homelessness prevention programs in the ESG program.

Explain how federal funds will leverage those additional resources (private, state and local funds), including a description of how matching requirements will be satisfied

There is no match requirement for the implementation of CDBG funds to the prioritized activities listed in the table above. However, CDBG funds often are leveraged with other local resources. OBDD will provide additional funds as match to the CDBG allocation, fulfilling the one-to-one matching requirements of the program.

OHCS provides tax credits and various gap financing to affordable housing developers. This process encourages creativity in the use of federal, state, and local government resources with private resources to meet the needs of communities. OHCS administers the federal LIHTC program, a major funding source for development of affordable housing. Tax credits are leveraged with other state and federal funds through a competitive Notice of Funding Availability (NOFA) process, allowing one application for all resources available through OHCS. For example, OHCS allocated approximately $9.1 million in credits for 2015. OHCS also administers the non-competitive four percent tax credits used in conjunction with tax-exempt bonds.

Matching funds for the HOME Program come from various state and local resources, including the Oregon Affordable Housing Tax Credit.

There is no non- federal match requirement for the HTF.

One hundred percent match is required by the ESG program. Matching contributions for the ESG program may come from any source, including federal, state, local, and private sources. HOME TBRA can be used as match in very limited circumstances. The following requirements apply to matching contributions from a federal source of funds:

- Adherence to laws and or grant restrictions, which govern use of funds for match, ensuring no prohibition to matching federal ESG funds; and

- If ESG funds are used to satisfy matching requirements of another federal program, funding from that program cannot be used to satisfy the match requirements for ESG.

Non-cash matching resources may include the value of the lease on a building, salary paid to staff carrying out the program (paid for with non-ESG dollars), and the value of the time and services contributed by volunteers to carry out the program. OHCS may consider exceptions on a case-by-case basis in consultation with the sub-grantee OHCS's ESG program does not generate program income.

As the grantee, OHA works with community housing and social service partners and leverages additional program funding to provide a continuum of HIV services. HOPWA funding is leveraged through additional resources. Federal Ryan White Part B funds and general state funds provide households served with insurance assistance, case management services, and wrap around support services. Emergency utility assistance is provided through the state's Low-

Income Energy Assistance Program. HOPWA has no match requirement, does not generate any program income, and will not use land or property that is publicly-owned. If appropriate, describe publically owned land or property located within the jurisdiction that may be used to address the needs identified in the plan

The state does not control the type of applications received for CDBG funds. However, the CDBG Method of Distribution (Appendix, Attachment A, chapters 4, 5, 7 and 10) outlines how OBDD-IFA would address projects that involve publically owned land or property should applications be received.

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

If appropriate, describe publically owned land or property located within the jurisdiction that may be used to address the needs identified in the plan

Not applicable.

Annual Goals and Objectives (AP-20)

Goals Summary Information

Table 3 – Goals Summary

Goal Number	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	CDBG - Public Works	2016	2020	Non-Housing Community Development		CDBG-Public Works	CDBG: $5,632,875	2 Projects
2	CDBG - Public/Community Facilities (SL1)	2016	2020	Non-Housing Community Development		CDBG-Public/Community Facilities	CDBG: $2,816,438	1 Project
3	CDBG - Public/Community Facilities (SL3)	2016	2020	Non-Housing Community Development		CDBG-Public/Community Facilities	CDBG: $2,816,438	1 Project
5	CDBG - Microenterprise Assistance	2016	2020	Non-Housing Community Development		CDBG-Microenterprise Assistance	CDBG: $220,897	3 Projects
6	CDBG - Housing Rehabilitation	2016	2020	Affordable Housing		CDBG-Housing Rehabilitation	CDBG: $2,098,522	6 Projects
7	CDBG - Community Capacity/ Technical Assistance	2016	2020	Non-Housing Community Development		CDBG-Community Capacity/Technical Assistance	CDBG: $110,000	3 Projects
9	Prevent and divert people from becoming homeless	2016	2020	Homeless		Rapid Rehousing with Supportive Services Rental Assistance	HOME: $1,073,197 ESG: $452,130	Tenant-based rental/Rapid Rehousing assistance: 400 Households Assisted Homelessness Prevention: 1,700 Persons Assisted
10	Reduce homelessness	2016	2020	Homeless		Rapid Rehousing with	ESG: $1,320,927	Tenant-based rental

						Supportive Services Rental Assistance Shelter Beds and Homeless Services Street Outreach		assistance / Rapid Rehousing: 400 Households Assisted Homeless Person Overnight Shelter: 6,200 Persons Assisted Outreach: 760 Other
11	Fund affordable housing	2016	2020	Affordable Housing		Accessible Housing Affordable Housing Rehabilitation and Preservation of Units	HOME: $5,164,730 HTF: $3,000,000	Rental units constructed: 60 Housing Units Rental units rehabilitated: 30 Housing Units Accessible Units: Minimum of five percent of units built.
12	Affirmatively further fair housing	2016	2020	Fair Housing		Affordable Housing Accessible Housing Fair access to housing and housing choice	HOME: $75,000 (HOME Administrative Funds) and other sources	OHCS has a Contract with FHCO provide fair housing services throughout the state.
13	Provide people with HIV/AIDS supportive housing	2016	2020	Supportive housing for people with HIV		Permanent Housing with Supportive Services Rental Assistance	HOPWA: $387,474	Housing for People with HIV/AIDS added: 55 Household Housing Unit

Goal Descriptions

Table 4 – Goal Descriptions

1	**Goal Name**	**CDBG - Public Works**
	Goal Description	Provide sustainable and suitable living environments through enhancements, improvements or construction of water and wastewater systems to provide availability and accessibility to clean, safe drinking water and safe sanitary sewer systems
2	**Goal Name**	**CDBG - Public/Community Facilities (SL1)**
	Goal Description	Rehabilitation or construction of community facilities such as food banks, family resource centers, community centers, senior centers, fire stations or libraries, many of which rarely produce a reliable or sufficient revenue stream to repay a loan.

3	**Goal Name**	**CDBG - Public/Community Facilities (SL3)**
	Goal Description	Rehabilitation or construction of drug and alcohol treatment centers, Head Start facilities, mental health and health clinics, and sheltered workshops for people with disabilities.
5	**Goal Name**	**CDBG - Microenterprise Assistance**
	Goal Description	Improve economic opportunities through training and classes aimed at improving the conditions and success for business owners the majority of whom will be low-to-moderate income persons.
6	**Goal Name**	**CDBG - Housing Rehabilitation**
	Goal Description	Preserve decent housing, improving the sustainability and affordability of existing housing stock, through rehabilitation projects of single-family, owner-occupied homes by providing grants or loans to complete needed repairs, many of which are health and safety related. One hundred percent of the funds in this goal will serve low-to moderate-income homeowners.
7	**Goal Name**	**CDBG - Community Capacity/ Technical Assistance**
	Goal Description	Oregon uses one percent of CDBG funds to train and provide technical assistance to several economic development organizations, infrastructure conferences, and other local capacity building events, grant administration workshops, applicant workshops, grant management training, and one-on-one technical assistance.
9	**Goal Name**	**Prevent and divert people from becoming homeless**
	Goal Description	Promote services to support people at risk of homelessness and work to prevent homelessness through increased housing stability using services that include but are not limited to: security and utility deposit payment, rent subsidy, and case management and self-sufficiency opportunities. Acknowledge that preventing individuals and families from becoming homeless is critical to ending homelessness. Every episode of homelessness that can be averted spares men, women, and children the psychological and physical trauma of not being housed.
10	**Goal Name**	**Reduce homelessness**
	Goal Description	Promote programs that reduce homelessness through homeless prevention services such as financial and rent assistance, and re-house people experiencing homelessness into permanent housing. Rapid re-housing places a priority on moving a family or individual experiencing homelessness into permanent housing as quickly as possible, ideally within 30 days of becoming homeless and entering a program. HOME TBRA funds provide rent assistance and pay security deposits. Both homelessness prevention and rapid rehousing services couple financial and/or rent assistance with case management and self-sufficiency opportunities. Clients may be provided referrals to agencies that

		can help address, mitigate and possibly alleviate other barriers causing housing instability.
11	**Goal Name**	**HOME and HTF- Fund affordable housing**
	Goal Description	Oregon HOME and HTF funds are used to finance the development of affordable housing for low income households, HTF funds are focused largely on extremely low income households. Funds can be used for new construction, acquisition and rehabilitation. The HOME and HTF programs meet the accessibility requirements of section 504 of the Rehabilitation Act.
12	**Goal Name**	**Affirmatively further fair housing**
	Goal Description	Work diligently to promote fair housing and access to housing choice for all Oregonians. Take meaningful action to overcome patterns of segregation and promote inclusive communities free of barriers to opportunity. OHCS is committed to distributing resources and supporting programs to address housing inequities and disparities experienced by communities of color and other underserved communities.
13	**Goal Name**	**Provide people with HIV/AIDS supportive housing**
	Goal Description	HOPWA funds will meet the permanent housing needs of people living with HIV through provision of tenant based rental assistance and permanent housing placement, to include deposits. HOPWA funding will be leveraged through federal Ryan White Part B funds and general state funds to provide insurance assistance, case management services, and wrap around support services.

Allocation Priorities (AP-25)

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

Funding Allocation Priorities

Table 5 – Funding Allocation Priorities

	CDBG	HOME	HTF	HOPWA	ESG
CDBG – Public Works (%)	51	0	0	0	0
CDBG – Public/Community Facilities (SL1) (%)	14	0	0	0	0
CDBG – Public/Community Facilities (SL3) (%)	14	0	0	0	0
CDBG – Housing Rehabilitation (%)	19	0	0	0	0
CDBG – Micro-enterprise (%)	2	0	0	0	0
CDBG – Community Capacity/Technical Assistance (%)	0	0	0	0	0
Prevent and divert people from becoming homeless (%)	0	0	0	0	32
Reduce homelessness (SL1) (%)	0	21	0	0	68
Fund affordable housing (%)	0	74	100	0	0
Support Grants for CHDOs	0	5	0	0	0
Provide people with HIV/AIDS supportive housing (%)	0	0	0	100	0
Affirmatively further fair housing (%)	0	0	0	0	0
Total (%)	100	100	100	100	100

Reason for Allocation Priorities

CDBG priorities were identified based on previous program demands, past experience, and OBDD-IFA's cost/benefit analysis. By allocating the funds in this manner, it provides the state investment flexibility. OBDD-IFA is not obligated to award all the funds allocated to a particular priority or category. If a sufficient number of projects are not awarded in a particular category, applications in other categories may be funded. Each quarter the agency will conduct a target review to determine if funds should be moved from one category to another. Allocation priorities were also based on the projected available funds from the annual funding allocation reduced by an average of two percent based on the 2011-2015 allocation.

OHCS funding priorities have been established based on the depth of need for affordable rental housing resources in the community. The rental housing assistance is allocated through a network of Community Action Agency partners in order to provide a means for housing supports to be used with locally available housing stock.

The majority of the HOME funding is used to finance the development of multifamily housing in the Balance of State, where there is a tremendous amount of unmet need for affordable rental housing. A small portion of the HOME funds are to support Community Housing Development Organizations in order to ensure performance, and the state's ability to meet funding requirements.

2016 is the first year the State of Oregon has received an HTF allocation. The funding priorities are consistent with those of the HOME program and the new funds will be used to finance units affordable to those who are extremely low income. The state HTF funds are to be available for investment statewide.

The percentages for the ESG and HOME TBRA goals are determined by what subgrantees submit to OHCS through the funding application process. Applications are reviewed by program staff for organizational capacity, needs-based population targeting, utilization of the funds, and feasible program strategies which meets federal and state delivery requirements and priorities. Additionally, each subgrantee's knowledge of community needs, extent of engaged partners, historical delivery capacity and success are reviewed. Funds are allocated by formula using three criteria: severe housing burden, poverty and homelessness, and made available upon approval of each subgrantee's application and execution of their MGA. The funding formula utilizes three data elements for ESG: severe housing burden, poverty, and homelessness, and four for HOME TBRA: housing burden, severe housing burden, poverty, and income below 50 percent median.

Oregon encourages the Housing First approach and the prioritization of ESG funding for rapid re-housing within the context of local needs and affordable housing capacity. The state's increasing severe shortage of affordable housing has forced subgrantees to spending towards prevention and shelter, which is reflected in the allocation priorities.

HOPWA funds are distributed in 31 counties outside of the Portland Metropolitan Statistical Areas (MSAs). Funds are provided through direct payments to property managers on behalf of participating clients. HOPWA funded activities address program objectives by providing permanent supportive housing for people living with HIV/AIDS and their families, through rental assistance and supportive services. These include housing placement services, case management in the form of benefits coordination, housing stability planning and housing information services. As the grantee, OHA works with community housing and social service partners, and leverages additional program funding to provide a continuum of HIV services.

How will the proposed distribution of funds address the priority needs and specific objectives described in the Consolidated Plan?

CDBG Section 106(d)(2)(C)(iii) of the Housing and Community Development Act (HCDA) prohibits a state from declaring certain statutorily eligible activities as ineligible for funding under the state's program, but does allow a state to establish funding priorities among the types of eligible activities. In accordance with the HCDA, the state will consider applications for funding consistent with the identified funding priorities within the CDBG Method of Distribution (MOD). A copy of the MOD may be found in the Appendix, Attachment A.

The top priority needs to be addressed with CDBG funds are public works, community facilities, and housing (61%, 16%, and 12%, respectively). Priority of need was based on responses and information received through public outreach and consultation with advocacy groups, non-profit partners, and topical research. Details about CDBG allocation priorities can be found in the Appendix, Attachment A.

HOME funding priorities are designed to specifically address objectives of increasing and preserving the states affordable housing resources, and providing rental assistance directly to the communities.

OHCS HOME funds are used to provide rent assistance, develop multifamily housing, and to support Community Housing Development Organizations in order to best meet the established goals and objectives.

The funding allocation priority for HOME TBRA is to provide rental assistance that will stabilize housing for very low income households at risk of becoming homeless. The amount of HOME TBRA allocated to subgrantees is based on four criteria:the percentage of households in a subgrantee's service area with housing burden, severe housing burden, income below federal poverty level, and income at or below 50 percent median household income.

HTF is a new federal affordable housing production program that is leveraged with other federal and state funding. It will be made available through OHCS annual LIHTC and HOME NOFA as an additional source of funding for multifamily rental housing projects with units affordable to extremely low income (ELI) households.

The distribution of ESG funds to prevent and divert people from becoming homeless, will address the priority need for rent assistance and related costs necessary for people at-risk of homelessness to retain and secure permanent housing. Priority populations will continue to be served based on historical service data.Approximately 35 percent of those receiving ESG prevention services will represent special populations including veterans, victims of domestic violence, elderly, people with HIV/AIDS and the chronically homeless. Fifty-one percent of ESG recipients have a disability, including severe mental illness and chronic substance abuse. By HUD requirement, all recipients of ESG prevention services will be extremely low income.

Distribution of ESG funds to reduce homelessness addresses three priority needs: rapid rehousing with supportive services, rent assistance and shelter beds and homeless services. ESG funds dedicated to this goal will provide shelter facilities and operations, housing relocation and stabilization financial assistance and services, and short- and medium-term rental assistance. Based on historical data, it is estimated that 39 percent of the served population will qualify as a special population and 51 percent will have a disability. Those served within this goal will be extremely low income.

Methods of Distribution (AP-30)

Introduction

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

Distribution Methods

Table 6 - Distribution Methods by State Program

1	State Program Name:	CDBG
	Funding Sources:	CDBG
	Describe the state program addressed by the Method of Distribution.	CDBG funded activities include public works, public/ community facilities, housing rehabilitation, microenterprise assistance, community capacity/technical assistance and emergency projects.
	Describe all of the criteria that will be used to select applications and the relative importance of these criteria	CDBG specifies the program requirements and application criteria in a detailed manner within chapters 1 through 7 of the 2017 CDBG Proposed MOD (Appendix, Attachment A).
	If only summary criteria were described, how can potential applicants access application manuals or other state publications describing the application criteria? (CDBG only)	Potential applicants may easily access the state's CBDG proposed MOD on OBDD's website, or by contacting one of OBDD-IFA's regional coordinators who are covering 10 regions statewide. The State's CDBG proposed MOD is designed in such way that it encompasses all aspects of program eligibility; federal requirements through application process. (2017 Proposed MOD, Appendix Attachment A).
	Describe the process for awarding funds to state recipients and how the state will make its allocation available to units of general local government, and non-profit organizations, including community and faith-based organizations. (ESG only)	Not applicable to CDBG.
	Identify the method of selecting project sponsors	Not applicable to CDBG.

	(including providing full access to grassroots faith-based and other community-based organizations). (HOPWA only)	
	Describe how resources will be allocated among funding categories.	CDBG-Targeted allocation of funds provides OBDD-IFA investment flexibility and is based on previous demand and the department's cost/benefit analyses. After each quarterly round, OBDD-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 OBDD-IFA to award all the funds targeted to each category. If a sufficient number of projects are not awarded in a particular category, applications in other categories may be funded.
	Describe threshold factors and grant size limits.	CDBG- There are multiple threshold factors to be considered. Major considerations include the project being a CDBG eligible activity and the projects ability to meet a national objective. Grant size limits for 2016 are as follows: public works projects-$2,000,000; community facilities-$1,500,000; housing rehabilitation-$400,000; and microenterprise-$100,000. While these are the maximum grants allowable, other determining factors such as need and availability of funds are taken into consideration during the award process. Detailed information can be found in the 2017 Proposed MOD (Appendix, Attachment A).
	What are the outcome measures expected as a result of the method of distribution?	CDBG - The primary objective of Oregon's CDBG program is to continuously develop viable communities by providing decent housing (DH); suitable living environments (SL) and expanding economic opportunities (EO) for low and moderate income persons residing within the State's non-entitlement jurisdictions.
2	State Program Name:	Emergency Solutions Grant
	Funding Sources:	ESG
	Describe the state program addressed by the Method of Distribution.	Emergency Solutions Grant (ESG) funds are used to assist individuals and families regain housing stability after experiencing a housing crisis, homelessness, or being at risk of homelessness. Support can include, but is not limited to, outreach, shelter, and essential services, transitional housing, permanent housing, rental assistance, case management, and assistance with self-sufficiency opportunities
	Describe all of the criteria that will be used to select applications and the relative importance of these criteria.	Once HUD approves Oregon's Annual Action Plan, OHCS receives a lump sum allocation for the ESG program. Sixteen private nonprofits and local government entities are eligible for these funds, and apply to OHCS biennially. Each applicant is awarded funds based on a formula which considers three data elements for each county served by the organization: severe housing burden, poverty, and homelessness.Data from the Census Gross Rent as a Percentage of Household Income in The Past 12 Months report, the Census SAIPE Program

		2013 Poverty and Median Household Income Estimates report, and the 2013 and 2015 Point-In Time Count is used to calculate each county's percentage of the state's severe housing burden, poverty and homelessness. Further, the percentage for each county is weighted for severe housing burden at 30 percent, percentage in poverty at 45 percent, and number counted as homeless at 25 percent. This calculation is then used to determine the percentage of the State's ESG allocation that will be awarded to each county. Applicants may serve more than one county, and once county allocations are known, OHCS calculates the percentage of the State's ESG allocation that will be awarded to each applicant.
	If only summary criteria were described, how can potential applicants access application manuals or other state publications describing the application criteria? (CDBG only)	Not applicable to ESG.
	Describe the process for awarding funds to state recipients and how the state will make its allocation available to units of general local government, and non-profit organizations, including community and faith-based organizations. (ESG only)	OHCS administers federal and state homeless program funds including Emergency Solutions Grants, Emergency Housing Assistance, State Homeless Assistance Program, Housing Stabilization Program, Low Income Rental Housing Fund and Home Tenant-Based Rental Assistance. The distribution of these program funds is done through a Master Grant Agreement funding application process between OHCS and its Community Action Agency subgrantees. In compliance with Oregon legislative mandate, OHCS is required to utilize the Community Action Agency network as its primary service delivery mechanism at the local level. The Master Grant Agreement is the legal, contractual agreement utilized for disbursement of OHCS administered anti-poverty grant funds. Subgrantees coordinate with multiple local and statewide partners to establish linkages that maximize housing stabilization efforts and address the diversity of needs of homeless persons while avoiding duplication of services. Reporting and tracking of the linkages is completed annually by each subgrantee and includes narrative descriptions of the linkages and numbers of clients served by type of linage service. These linkages supplement the state's federal and state homeless programs resulting in enhanced services including: utility and weatherization services, TANF assistance, Head Start, family support, medical care, assistance through homeless school liaisons, workforce and job assistance, emergency food and nutrition education, child welfare support, and volunteer time and in-kind donations.
	Identify the method of selecting project sponsors (including providing full access to grassroots faith-based and other community-based organizations). (HOPWA only)	Not applicable to ESG.

	Describe how resources will be allocated among funding categories.	During the funding application process, the subgrantee applicants submit work plans and budgets to indicate the services they will provide with their ESG funding. The budgets are divided by funding category. If the categorical division of services is approved, funds are allocated in those categorical amounts. Subgrantee applicants must explain to the satisfaction of OHCS staff any concentration of funds budgeted for a category, or the absence of funds for a category. Additionally, OHCS staff ensure the division of funds to all ESG categories conform to the limitations of 24 CFR 576.100.
	Describe threshold factors and grant size limits.	Upon approval of each subgrantee's application and execution of the Master Grant Agreement, funds are distributed by formula through a notice of allocation to the subgrantee. The current funding formula utilizes three data elements: severe housing burden, poverty and homelessness.
	What are the outcome measures expected as a result of the method of distribution?	ESG subrecipients are required to report on two performance measures: 1) the percentage of total program participants served who reside in permanent housing at time of exit from program; and 2) the percentage of program participants who at program exit reside in permanent housing and maintain permanent housing for six months from time of exit.
3	State Program Name:	HOME
	Funding Sources:	HOME
	Describe the state program addressed by the Method of Distribution.	HOME funds for multifamily development are allocated through annual competitive Notices of Funding Availability. OHCS HOME funds may be invested in the HOME Balance of State, which is the geographic area of the State not covered by another Participating Jurisdiction.
	Describe all of the criteria that will be used to select applications and the relative importance of these criteria.	In addition to meeting a variety of threshold measures applicants are assessed against a series of competitive criteria. The overall structure of competitive criteria looks at Need (weighted 20%), Impact (40%), Preferences (10%), Financial Viability (15%), and Development Team Capacity (15%). Need examines the need for the project, its target population, and the current supply of affordable housing in the target area. Impact identifies ties to local and statewide planning efforts and initiatives as well as the services for residents and location efficiency. Preferences examine the extent to which a project serves those with the lowest incomes, and is located in areas that provide opportunity. Financial Viability examines the pro forma and capacity, and looks at the sponsor and management agent's portfolio performance. The goal is to fund new, or preserve existing affordable housing resources that are sustainable, address the housing needs, and have a positive impact on the residents. Oregon has adopted a 60 year affordability standard, extending well beyond what is required by

		HOME Program regulation. The HOME TBRA funding formula is defined by four criteria: housing burden, severe housing burden, households below federal poverty level, and households at or below 50 percent MFI.
	If only summary criteria were described, how can potential applicants access application manuals or other state publications describing the application criteria? (CDBG only)	Not applicable to HOME.
	Describe the process for awarding funds to state recipients and how the state will make its allocation available to units of general local government, and non-profit organizations, including community and faith-based organizations. (ESG only)	Not applicable to HOME.
	Identify the method of selecting project sponsors (including providing full access to grassroots faith-based and other community-based organizations). (HOPWA only)	Not applicable to HOME.
	Describe how resources will be allocated among funding categories.	HOME funds will be allocated to Community Action Agencies for Tenant Based Rental Assistance, to eligible housing developers on a per project basis to increase and preserve multifamily rental housing, and through operating support grants to Community Housing Development Organizations (CHDOs). The percentages associated with each of these activities have been determined based on overall need, as well as historic performance and future expectations.
	Describe threshold factors and grant size limits.	There are numerous threshold factors considered in the HOME Program. For multifamily housing development these are described in the Notice of Funding Availability (NOFA). Threshold measures include readiness to proceed, development team capacity, ownership integrity, total development cost per unit, and a program compliance review to ensure the project will meet established HOME program rules and regulations that apply to all OHCS programs, such as compliance with established rehabilitation standards. Eligible applicants for the state's HOME program include local governments, non-profit organizations, and for-profit developers, including but not limited to cities, counties, housing authorities, service providers, community based organizations such as CHDOs, community development corporations, and Community Action agencies. Any specific funding restrictions are established in individual

		NOFA as applicable. Through legislative mandate, HOME TBRA funds are allocated to members of the Community Action Agency network for service delivery at the local level. Funds are allocated by formula, using four criteria: housing burden, severe housing burden, poverty, and income at or below 50 percent median family income.
	What are the outcome measures expected as a result of the method of distribution?	The program funds are expected to have outcomes that meet the objectives of providing decent affordable housing, and creating suitable living environments.
3	State Program Name:	Housing Trust Fund (HTF)
	Funding Sources:	National Housing Trust Fund
	Describe the state program addressed by the Method of Distribution.	HTF funds for multifamily development are allocated through annual competitive Notices of Funding Availability. The HTF will be available statewide; however the limited number of dollars available will result in only a few projects being funded annually.
	Describe all of the criteria that will be used to select applications and the relative importance of these criteria.	In addition to meeting a variety of threshold measures applicants are assessed against a series of competitive criteria. The overall structure of competitive criteria looks at Need (weighted 20%), Impact (40%), Preferences (10%), Financial Viability (15%), and Capacity (15%). Need examines the need for the project, its target population, and the current supply of affordable housing in the target area. Impact identifies ties to local and statewide planning efforts and initiatives as well as the services for residents and location efficiency. Preferences examine the extent to which a project serves those with the lowest incomes, and is located in areas that provide opportunity. Financial Viability examines the pro forma and capacity, and looks at the sponsor and management agent's portfolio performance. The goal is to fund new, or preserve existing affordable housing resources that are sustainable, address the housing needs, and have a positive impact on the residents. Information about the affordability requirements and the criteria can be found in Attachment Z in the Appendix of the 2016-2020 Consolidated Plan Amendment.
	If only summary criteria were described, how can potential applicants access application manuals or other state publications describing the application criteria? (CDBG only)	Not applicable to HTF.
	Describe the process for awarding funds to state recipients and how the state will make its allocation available to units of general local government, and	Not applicable to HTF.

	non-profit organizations, including community and faith-based organizations. (ESG only)	
	Identify the method of selecting project sponsors (including providing full access to grassroots faith-based and other community-based organizations). (HOPWA only)	Not applicable to HTF.
	Describe how resources will be allocated among funding categories.	HTF funding will be allocated to specific eligible projects, on a statewide basis, through the established competitive NOFA process currently utilized by OHCS to allocate LIHTC and HOME funds.
	Describe threshold factors and grant size limits.	There are numerous threshold factors that will be considered in the HTF Program. For multifamily housing development these are described in the NOFA. Threshold measures include readiness to proceed, development team capacity, ownership integrity, total development cost per unit, and a program compliance review to ensure the project will meet established HTF program rules and regulations that apply to all OHCS programs, such as compliance with established rehabilitation standards. OHCS will utilize per-unit subsidy limits that are “reasonable” based on the actual costs of developing affordable housing in Oregon and are adjusted for the number of bedrooms in the units and the geographic location of the project. OHCS will utilize the same per unit limits for HTF as are used for LIHTC and HOME programs.
	What are the outcome measures expected as a result of the method of distribution?	The program funds are expected to have outcomes that meet the objectives of providing decent affordable housing, and creating suitable living environments.
5	State Program Name:	Housing Opportunities for Persons with HIV/AIDS
	Funding Sources:	HOPWA
	Describe the state program addressed by the Method of Distribution.	OHA is the grantee for HOPWA formula funding and directly carries out program implementation.
	Describe all of the criteria that will be used to select applications and the relative importance of these criteria.	OHA is the grantee for HOPWA formula funding and directly carries out program implementation.
	If only summary criteria were described, how can potential applicants access application manuals or other state publications describing the application	Not applicable to HOPWA.

	criteria? (CDBG only)	
	Describe the process for awarding funds to state recipients and how the state will make its allocation available to units of general local government, and non-profit organizations, including community and faith-based organizations. (ESG only)	Not applicable to HOPWA.
	Identify the method of selecting project sponsors (including providing full access to grassroots faith-based and other community-based organizations). (HOPWA only)	OHA is the grantee for HOPWA formula funding and directly carries out program implementation.OHA does not administer the program through project sponsors.
	Describe how resources will be allocated among funding categories.	OHA allocates HOPWA Formula awards based on historical need, taking into consideration the number of clients served in the prior budget period, projected changes to the number of clients served, average costs per client, and projected changes to those average costs. Utilizing current year funding, in conjunction with carry-over from the preceding budget year, OHA maximizes utilization of funds under the program's capacity. After allocating across all funded service types based on future year projections, OHA allocates any remaining funds from the Formula award to TBRA as the program sees the most variation in the projections and it is the highest utilized service.
	Describe threshold factors and grant size limits.	OHA does not utilize a request for proposal process
	What are the outcome measures expected as a result of the method of distribution?	OHA utilizes the standard outcome measures provided by the HOPWA program: the number of clients with a housing plan, number with case management contact in accordance with the standards of service, number who had contact with a primary health care provider, number who accessed and maintained medical insurance, and number who accessed or maintained a source of income.

Projects (AP-35)

No projects for plan year 2017 are identified at this time. Funding allocations for CDBG, HOME, ESG and HTF projects will not be determined until program-specific applications are received and evaluated. Awards will be made in 2017 and reported in the 2017 CAPER.

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

For the HOME and HTF programs, this question will be answered in the 2017 CAPER as the allocation priorities will be provided in the 2017 NOFA. For CDBG the program priorities are outlined in the 2017 Method of Distribution, Attachement A. ESG is allocated by formula.

Section 108 Loan Guarantee (AP-40)

Will the state help non-entitlement units of general local government to apply for Section 108 loan funds?

No.

Available Grant Amounts

Not Applicable.

Acceptance process of applications

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

Community Revitalization Strategies (AP-45)

Will the state allow units of general local government to carry out community revitalization strategies?

No.

State's Process and Criteria for approving local government revitalization strategies

Under the state's CDBG program, Community Revitalization Strategies are not a priority. However, units of general local government (UGLG) can develop revitalization strategies with non-CDBG funds. Further, if a component of the strategy fits within the CDBG funding priorities, as outlined in the MOD, and is eligible for funding under the CDBG program (e.g., upgrade city wastewater system, rehabilitate a community facility, etc.), the UGLG could apply for assistance under the CDBG for that component of the identified revitalization plan.

Geographic Distribution (AP-50)

Description of the geographic areas of the state (including areas of low-income and minority concentration) where assistance will be directed

Oregon does not target specific geographic areas for funding, however, funding is provided throughout the non-entitlement areas of the state.

Rationale for the priorities for allocating investments geographically

The funds for the HOME, HTF, ESG, HOPWA, and CDBG programs are not allocated using geographic priorities. Oregon is committed to ensuring public resources are invested in a way that is responsive to the diversity of low-income housing needs, public infrastructure, community facilities and microenterprise needs around the state.

HOME funds are distributed on a competitive basis through the NOFA application process to any qualified project located in a jurisdiction that does not directly receive the program funds from HUD (the Balance of State).

HTF funds are also distributed on a competitive basis through the NOFA application process to any qualified project in the state. Geographic measures of needs are based on the percentage of the state's severe rent burdened and low-income renter households in each city or county (need distribution), the sum of the city and county funded affordable housing units (affordable housing inventory), and a comparison of the actual distribution of the affordable housing units to how the affordable housing units would be distributed using the need distribution calculation (underserved geography calculation).

Up to 21 percent of HOME funds are allocated to Tenant Based Rental Assistance (TBRA) to serve households at or below 50 percent median family income. TBRA allocations are determined using a formula established by a strategic needs analysis which factors in the percentage of cost-burdened, severely cost burdened, poverty level households and households with 50 percent or less median income.

Distribution of ESG funds follow an allocation formula based on the percentage of the state's severely rent-burdened households in each county, the homeless count, and economically disadvantaged households. Economically disadvantaged households are defined as a percent of total households based on the number of persons living below the federal poverty line reported in the Census Bureau's Small Area Income and Poverty Estimates report.

HOPWA funds are distributed based on client acuity, and made through direct payment to property managers on behalf of participating clients. Clients are prioritized for assistance based on their assessed need, without consideration for geographic location. The distribution of resources closely aligns with the HIV prevalence in the Balance of State.

CDBG funds are awarded on a quarterly basis to eligible units of general local government in the non-entitlement areas of the state. Allocations are made through a competitive application process. Details of this process can be found in Chapter 7 of the CDBG Method of Distribution (MOD) (Appendix, Attachment A).

Affordable Housing (AP-55)

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

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

One Year Goals for the Number of Households to be Supported	
Homeless	0
Non-Homeless	210
Special-Needs	55
Total	265

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

One Year Goals for the Number of Households Supported Through	
Rental Assistance	455
The Production of New Units	60
Rehab of Existing Units	100
Acquisition of Existing Units	0
Total	615

Totals include HOME, HTF, ESG and CDBG programs.

The CDBG one year goals for the number of households supported through rehab of existing units is 70, and is based on past years' activity. The CDBG program funding of housing-related activities is limited to low-and moderate income, single-family owner-occupied homes; a minimal amount of the overall CDBG program. Rehabilitation of existing single-family, owner-occupied, units will be funded primarily through CDBG resources within the CDBG Housing Rehabilitation program administered by OBDD-IFA.

OHCS, through the HOME program, expects to produce 60 new units, and acquire and rehabilitate 30 existing units. The HTF is expected to produce 60 units that will serve extremely low income households.

Oregon's HOPWA program helps create a continuum of stable, sustainable housing for people living with HIV/AIDS. The objective of HOPWA is to assist households in establishing and maintaining a stable living environment that is safe, decent and sanitary, reducing the risks of homelessness, and improving access to HIV treatment and other health care and support.

HOPWA promotes client housing stability and acts as a bridge to long-term assistance programs such as Section 8, or to self–sufficiency. In 2017, OHA will support 55 households with tenant based rental assistance through HOPWA formula funds.

Public Housing (AP-60)

OHCS is a state housing finance agency and does not manage public housing.

Actions planned during the next year to address the needs to public housing

Actions to address the needs for public housing are performed by Oregon's Public Housing Authorities.

Actions to encourage public housing residents to become more involved in management and participate in homeownership

Actions to encourage public housing residents to become more involved in management, and participate in homeownership, are performed by Oregon's Public Housing Authorities.

If the PHA is designated as troubled, describe the manner in which financial assistance will be provided or other assistance

There are no public housing authorities (PHAs) located in Oregon that are designated as troubled by HUD. However, if a PHA does receive a designation as troubled, the PHA would work directly with HUD to resolve any issues.

Homeless and Other Special Needs Activities (AP-65)

OHCS, through its Community Action Agency network, uses ESG funds, to provide street outreach, emergency shelter, transitional housing, rapid re-housing, homelessness prevention, and data collection and reporting. ESG funds are used in conjunction with other state and federal homeless funds to provide a continuum of services with an emphasis upon rapid re-housing. Unfortunately, Oregon's current housing crisis has forced grantees to shift priorities to homeless prevention as affordable permanent housing for those transitioning out of homelessness is increasingly difficult to obtain. Multiple efforts are being made to encourage landlords to rent to those who are homeless, including landlord guarantee incentives that reimburse for unit damages and loss of rent.

Describe the jurisdictions one-year goals and actions for reducing and ending homelessness including

Reaching out to homeless persons (especially unsheltered persons) and assessing their individual needs

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

The 2016-2020 Consolidated Plan is designed to help jurisdictions develop a strategic plan to address their housing and non-housing community development needs. The strategic plan builds on the findings of the Needs Assessment and Market Analysis by requiring that the State develop goals to meet the needs of the communities HUD serves. The annual action plans, and the companion Consolidated Annual Performance and Evaluation Reports (CAPER/PER), are detailed reports on how well the State is able to meet these goals.

To meet the unmet housing need for people with extremely low incomes, Oregon would need to build 102,500 new units, and preserve all existing subsidized units. In a time when vacancy rates are exceptionally low, and subsidy for affordable housing is becoming harder to come by, people and families face significant housing instability. Flat wages, in conjunction with rapidly increasing housing and transportation costs, mean fewer resources are available for people to meet their basic needs of food, clothing, and medicine.

Oregon communities identified bringing water and public infrastructure into compliance with local and federal regulations as their highest priority for non-housing and community development needs funded by the CDBG program. Antiquated water and sewer systems are

poorly maintained, and no longer able to achieve compliance with ever-evolving safe drinking water standards. Most cities, counties, and special districts have developed wide-range capital improvement plans to address these issues, and currently are going through the very delicate process of user rate review and adjustments.

Inadequate infrastructure systems are one of the major obstacles to local communities' ability to meet the current needs of residents and businesses, or to attract new growth and investment. Due to the significant cost of these infrastructure projects, federal and state funding is simply not enough to meet the demand. High utility rates in the non-entitlement areas of Oregon create an additional barrier for low-and moderate-income people.

The Consolidated Plan will be used to help the state develop useful strategies to meet the housing, homeless, and community development challenges facing Oregon. The strategies and goals of the plan were developed in partnership with the community, and with an eye toward social equity. This work is built on the foundation of the Analysis of Impediments to Fair Housing Choice and will inform the Statewide Housing Plan required under ORS 456.572, the planning work of the Oregon Health Authority, and that of the Oregon Business Development Department-Infrastructure Finance Authority.

Oregon Housing and Community Services (OHCS), together with the Community Action Agencies across the state, use Emergency Solutions Grant Program (ESG) funds to assist individuals and families regain housing stability after experiencing a housing crisis or homelessness. These groups work together to meet the needs of the homeless population. Support can include, but is not limited to, outreach, shelter and essential services, transitional housing, permanent housing, rental assistance, case management, and assistance with self-sufficiency opportunities.

Outreach includes making homeless people aware of resources available to them, and connecting them to those resources. The type/s of outreach a service provider will use depends on the community, demographics, and special needs of the populations being served. Therefore it's imperative that service agencies understand the demographics of the people living in their service areas. OHCS requires all ESG subrecipients to submit an Affirmative Outreach Plan that conforms with 24 CFR 576.407(b), as well as a written statement or plan for assisting applicants and clients with Limited English Proficiency requirements. In conjunction with annual Point in Time counts, many OHCS ESG subrecipients conduct a Project Connect-type event as an outreach tool to provide services for people who are homeless or at risk of homelessness. Project Connects and similar one-or two-day events offer a one-stop location where people experiencing or at-risk of homelessness can receive specialized services, such as medical and dental care, hot meals, food boxes, clothing, camping supplies, eye exams, veterinary exams for pets, and legal services .These gatherings are an excellent tool to reach hard to reach populations and start developing relationships.

Outreach efforts also provide people experiencing or at-risk of homelessness information on housing support services, alcohol and substance abuse programs, emergency shelters, warming

centers, crisis hot lines, and job readiness training. Many counties also host Veterans Stand Down programs where hot meals are served, service providers are available to offer assistance, businesses offer free products, medical and dental professionals provide services, pets are seen by veterinarians, and barbers and beauticians offer free services to veterans.

Continuums of Care, and service agencies across the State, are at various stages of developing and implementing Coordinated Entry systems. Coordinated Entry systems allow the provider to assess a person's needs using a centralized database, ensuring that each person receives a thorough, expedited assessment along with a coordinated approach to services. Use of standard assessment tools can assist to align appropriate services with resources to fit personal needs. Through a network of case management, community based support systems, financial and rent assistance and self-sufficiency opportunities, homeless and at-risk households are linked to services designed to help them obtain or retain housing stability.

Addressing the emergency shelter and transitional housing needs of homeless persons

Oregon Housing and Community Services, in partnership with Community Action Agencies (CAAs) across the state, works to provide shelter for individuals and families who are homeless and without safe shelter. Safe houses may be available for families with children in circumstances where the safety of clients is most pronounced. Most urban areas offer emergency shelters and warming centers during cold weather months. In areas where emergency shelters are not available, providers make use of motel vouchers, which allows the provider time to make other arrangements for transitional housing.

While emergency shelters can, and do, assist people on a temporary basis, transitional housing goes a step further providing housing and support services up to a term of 24 months. Service providers working with persons experiencing homelessness, including persons in shelters and transitional housing programs, create a connection to mainstream services and assistance, helping households to address their housing barriers, working to increase the household's housing stability through life skills training, financial and consumer education, parenting skills, interpersonal skill building, job preparation and placement, mental health counseling, and health assessments.

Helping homeless persons (especially chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth) make the transition to permanent housing and independent living, including shortening the period of time that individuals and families experience homelessness, facilitating access for homeless individuals and families to affordable housing units, and preventing individuals and families who were recently homeless from becoming homeless again.

Oregon's Community Action Agencies (CAAs) provide comprehensive services and support for households transitioning from homelessness to being housed. The Emergency Solution Grant Program (ESG) funds, in combination with other resources, provides assistance to extremely low income households so that they may secure, maintain, and retain housing.

Coordinated Entry systems are being developed and implemented to optimize Community Action Agency efforts to coordinate with area nonprofit providers, and State and local governments, promoting effective use, and access, to mainstream programs and self-sufficiency services aimed at ending homelessness. Through a network of services that include case management, community based support systems, financial assistance, and personal budgeting, people experiencing or at risk of homelessness are linked to services designed to assist households reach and maintain housing stability. When entering shelter, an individual is assessed and provided essential services based on their needs and the services available. Services may include referral for mental health care, life skills supports, personal budgeting and finance, conflict resolution, and other needed skills designed that help reduce barriers and retain housing stability. Oregon Housing and Community Services (OHCS) promotes the use of a Housing First approach in its 10-Year Plan to End Homelessness. CAAs are encouraged to accept people experiencing homelessness for placement into permanent housing first, and then provide supportive services to resolve barriers to stabilizing the housing. The approach is designed to serve the basic needs of the person before addressing or working to resolve complex barriers.

Helping low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families and those who are: being discharged from publicly funded institutions and systems of care (such as health care facilities, mental health facilities, foster care and other youth facilities, and corrections programs and institutions); or, receiving assistance from public or private agencies that address housing, health, social services, employment, education, or youth needs

Oregon Housing and Community Services (OHCS) delivers rental assistance services through a statewide network of Community Action Agencies (CAAs), which is also the statewide system for delivery of anti-poverty services, including the Community Services Block Grant (CSBG). CAAs are able to align their poverty and homelessness resources to prevent homelessness and provide connections to supportive mainstream and community resources (i.e. employment services, child welfare assistance, TANF programs, etc.). CAAs work extensively with governmental entities, nonprofits, mental and physical health providers, schools, public safety providers and others to design, implement, and deliver programs and services to low-income individuals and families.

Community Action Agencies provide extensive information and referral, and are key participants in their respective Continuums of Care, which enables them to be a community hub for linking low-income people to mainstream supportive services. CAAs maintain partnerships with systems of care to ensure coordination and to avoid duplication of services. These systems include serving foster youth, individuals with disabilities, veterans, people leaving correctional institutions, people discharged from hospitals, homeless students, and victims of domestic violence. CAAs work with area partners, small businesses, government entities, and property managers to help low-income people who have a criminal history successfully overcome barriers to re-entering communities.

ESG funds are used to help people stay housed through the use of financial assistance, short-term or medium term rental assistance, utility assistance, housing search and placement, case management, and other supportive services. Keeping people housed strengthens families, increases employment retention, improves financial stability, and strengthens the community.

HOPWA Goals (AP-70)

AAP Table 10 - One Year HOPWA Goals

One year goals for the number of households to be provided housing through the use of HOPWA for:	
Short-term rent, mortgage, and utility assistance to prevent homelessness of the individual or family	0
Tenant-based rental assistance	55
Units provided in permanent housing facilities developed, leased, or operated with HOPWA funds	0
Units provided in transitional short-term housing facilities developed, leased, or operated with HOPWA funds	0
Total	55

Barriers to affordable housing (AP-75)

Market forces put severe pressure on the number of affordable units available for low income families and individuals. In addition, many local policies, such as land use decisions, and fees and growth restrictions, further limit where and how many affordable units can be built. At the opposite end of the spectrum, limitations on how federal money can be used and state legislative decisions create barriers to building affordable housing.

Actions it planned to remove or ameliorate the negative effects of public policies that serve as barriers to affordable housing such as land use controls, tax policies affecting land, zoning ordinances, building codes, fees and charges, growth limitations, and policies affecting the return on residential investment

OHCS, along with OBDD-IFA and OHA, developed a Fair Housing Action Plan to outline strategies to remove barriers to fair housing choice. The actions are organized into high and low priorities to be met over a short, medium, and long term period.

OHCS' and OBDD's short term action items include:

- Identify resources and provide opportunities for education and training on the requirements to provide reasonable accommodations.
- Fund a pilot program to review Comprehensive Plans submitted to DLCD to identify land use proposals with a potentially discriminatory impact.
- Continue the Oregon Individual Development Account (IDA) Initiative to increase opportunities for low income Oregonians to access home ownership.
- Continue discussions with the Oregon Affordable Housing Tax Credit workgroup and partners regarding the tax credit, and how this program can be used to provide additional opportunities in rural communities.
- Require that all grantees/developers of funded rental housing projects that have a high risk of compliance violations, or are poor performers, will annually inspect the condition and habitability of the units funded.
- Consider funding second chance tenant training programs and landlord guarantee programs (e.g. similar to the Housing Choice Landlord Guarantee program).
- Provide funding opportunities for programs focused on reentry and supportive housing.
- Provide fair housing education and training services including a fair housing complaint line and broader assistance with landlord/tenant disputes. Ensure fair housing resources are provided statewide; ensuring rural communities are able to effectively access services and resources.
- Conduct trainings for partners and key organizations, including re-entry professionals, nonprofit shelters and housing providers, state agencies and community based organizations to include, whenever possible, fair housing virtual tours and listening sessions to identify local fair housing issues and provide education and training as well

as assistance with landlord/tenant disputes.

- Fund complaint intake process in non-entitlement jurisdictions and evaluate for fair housing issues focusing on situations related to limited housing options for persons most vulnerable to housing discrimination: non-English speakers, persons of Hispanic descent, African Americans, large families and persons with disabilities.
- Conduct on-going education and outreach communication with non-entitlement area land use jurisdiction policy-making bodies focusing on best practices, model codes and plans, recent legal decisions and tools available for aiding in creating inclusive communities.
- Fund pilot program, along with OHCS, to review Post Acknowledgement Plan Amendments submitted to Department of Land Conservation and Development (DLCD) to identify land use proposals with potentially discriminatory impact.
- Work with DLCD to examine Oregon's land use laws and planning and zoning systems and seeks ways to help local jurisdictions meet statutory housing obligations.
- Review and support best practices to further housing choice for persons with disabilities, including potential modifications to states statutes to further fair housing protections for persons with disabilities residing in group home settings.

Other priority actions in the Fair Housing Action Plan (FHAP) can be found in the Appendix to the 2016-2020 Consolidated Plan, Attachment Q.

Other Actions (AP-85)

Introduction

This section describes the actions, and strategies, Oregon plans to take during the 2016-2020 Consolidated Plan period to foster and maintain affordable housing, evaluate and reduce lead-based paint hazards, reduce the number of poverty-level families, develop institutional structure, and enhance coordination between public and private housing and social service agencies.

Describe actions planned to address obstacles to meeting underserved needs.

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

OHCS will work to promote fair housing and access to housing choice for all Oregonians, and take meaningful action to overcome patterns of segregation and promote inclusive communities free of barriers to opportunity. OHCS, in partnership with OHA and OBDD-IFA developed a Fair Housing Action Plan (FHAP), which is targeted to improve and address these barriers. The FHAP can be found in the Appendix to the 2016-2020 Consolidated Plan, Attachment Q.

The following section includes impediments outlined in the AI that address obstacles to meeting underserved needs. This section includes the actions OHCS, OBDD-IFA, and OHA, will initiate to begin to address the impediments listed. The funding for these activities comes from a mixture of local, state and federal dollars.

Impediment: Lack of affordable, accessible housing, including housing available for persons with disabilities who wish to leave nursing homes or other institutional settings.

Actions:

- Determine the specific housing needs for persons with disabilities and develop proactive strategies to address the need.
- Determine how to better match persons with disabilities with accessible units, including if persons with disabilities have access to units as they become available.
- Examine how the state can increase the number of accessible units in publicly funded multifamily developments while complying with all relevant regulations and constraints.
- Support the efforts of Public Housing Authorities to implement adaptive modification programs.

- Promote polices that support aging in place and funding for retrofitting of senior housing. Support the continued dissemination of information on how communities can provide opportunities for residents to age in place and how to improve community access for persons with disabilities living in independent settings

Impediment: Refusal of some landlords to make reasonable accommodations for persons with disabilities.

Actions:

- Identify resources and provide opportunities for education and training on the requirements to provide reasonable accommodations.
- Housing choices for persons with disabilities are severely limited by lack of sidewalks, paved roads and reliable and sufficient public transportation.
- Prioritize accessibility improvements in publicly funded community development projects, to promote housing choice for persons with disabilities.

Impediment: Lack of enforcement of fair housing violations persists statewide.

Actions:

- Fund efforts of Fair Housing Council of Oregon (FHCO) to provide fair housing education and training services. Continue to fund the fair housing complaint line and provide broader assistance with landlord/tenant disputes. Promote increasing the language accessibility of these services.
- Strengthen the certification that all publicly funded grantees comply with all federal, state and local nondiscrimination laws. Provide educational materials to ensure grantees understand fair housing obligations.

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

Actions:

- Fund and expand fair housing audit testing to inform educational, outreach and enforcement efforts. Incorporate retesting and verification in efforts.
- Provide stakeholder education and training on fair housing laws and requirements.
- Promote tools and education for housing providers to understand fair housing requirements—e.g., working with apartment associations to distribute model lease agreements in English and Spanish and reasonable accommodations policies.
- Fund advocacy services to persons living with HIV/AIDS through locally based housing case managers.

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

Actions:

- Ensure that fair housing resources are provided statewide. Ensure that rural communities are able to effectively access services and resources. To the extent possible, prioritize long-term support for fair housing activities.
- Provide culturally specific fair housing education and outreach for tribal communities, Spanish speaking communities, new immigrants and persons with limited English proficiency.
- Ensure persons living with HIV/AIDS have access to Fair Housing information and resources.

Impediment: Discriminatory lending practices persist for persons of color.

Actions:

- Provide down payment assistance for low income homebuyers; provide focus on home buyers of color.
- Support funding homebuyer education and counseling, and financial education and counseling for low income homebuyers.
- Continue the Oregon Individual Development Account (IDA) Initiative to increase opportunities for low income Oregonians to access home ownership.

Impediment: Persons with criminal backgrounds have few, if any housing options.

Action:

- Examine the effectiveness of reentry programs in housing environment and support best practices.

Describe actions planned to foster and maintain affordable housing.

Research and outreach efforts show a considerable shortage of affordable housing in Oregon. Each year tax credits and rent subsidy contracts expire, jeopardizing Oregon's affordable housing stock, and risking a loss of units to the open market. Preserving decent housing, improving sustainability and affordability, and rehabilitation of units, are strategies Oregon will use to retain existing affordable housing. This task is becoming increasingly difficult and federal funds decrease or remain stagnant while construction cost rise.

The Oregon Legislature committed $40 million to fund the Local Innovation and Fast Track (LIFT) Housing Program. The program's objective is to build new affordable housing for families with children who are experiencing, or at-risk of homelessness. The LIFT Program offers a new

flexible funding source that will allow Oregon Housing and Community Services and its partners to test innovative strategies and create a modern model of affordable housing development.

OHCS's Home Ownership Assistance Program (HOAP) includes a First-time Homebuyer Program, and provides education and down payment assistance, a lender toolkit and resources, foreclosure prevention counselors and resources, and energy bill payment and weatherization assistance.

OHCS administers the HOME program for the balance of state, and the HTF program for the State of Oregon. HOME funds used for multifamily development are generally allocated through an annual competitive Notices of Funding Availability (NOFA) in conjunction with other available state resources, and are also allocated for rental assistance administered by Community Action Agencies. 2016 was the first year that OHCS received an HTF allocation. OHCS administered the HTF program similarly to the HOME NOFA. The goal is to create new, or preserve existing affordable housing resources that are sustainable, address the needs, and have an impact on the residents. Oregon has adopted a 60 year affordability standard, extending well beyond the required period of affordability.

OHCS provides federal and state tax credits and other available gap financing to affordable housing developers, administering the federal LIHTC program, a major funding source for development of affordable housing. Tax credits are leveraged with other state and federal funds through the competitive NOFA process, allowing one application for all resources available through the NOFA. The nine percent LIHTC NOFA includes other state resources such as the Oregon Affordable Housing Tax Credit, Low Income Weatherization funds, and a portion of the HOME funds in the balance of state. OHCS also administers the non-competitive four percent tax credits used in conjunction with tax-exempt bonds.

Describe actions planned to reduce lead-based paint hazards.

OHCS strategies to address lead based paint (LBP) hazards and increase access to housing without LBP hazards include:

- Inspection of OHCS funded properties for LBP hazards
- Implementation of monitoring, or informing property owners of monitoring requirements; and
- LBP education and training for staff and partners

OHCS' portfolio does not currently include any projects with hazards of lead poisoning, however properties constructed prior to 1978 may be subject to requirements for assessment, evaluation, and mitigation of LBP, per federal regulation 24 CFR Part 35. OHCS compliance officers determine if monitoring for LBP is required and, if necessary, implement, or advise property owners of monitoring requirements.

The ESG and HOME TBRA programs require a visual assessment for LBP hazards as part of the housing standards inspection prior to rental of units built prior to 1978, and the household includes a child under age six.

OBDD-IFA developed procedures to eliminate the hazards of lead poisoning due to the presence of LBP in housing assisted with Community Development Block Grant funds. In accordance with the Lead Based Paint Hazard Reduction Act of 1992 (Title X) the State established a certification program for inspectors and contractors and accrediting programs for trainers.

All purchasers and tenants of CDBG assisted emergency homeless shelters, transitional housing and domestic violence shelters constructed prior to 1978 receive a notice about the potential hazards of LBP. Grant recipients must keep documentation of the notifications in their local project file.

In addition, department staff has opportunities to continue LBP education by attending HUD sponsored trainings on healthy homes, LBP rules, repairs, and technical assistance.

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

OHCS, in partnership with the Community Action Partnership of Oregon, completed Oregon's 2015 Report on Poverty. The report is a comprehensive look at the national, state, and county poverty rates, characteristics of people living in poverty, household incomes, the number of homeless people, and households in the state. The report shows us that Oregon's poverty rate of 16.2 percent remains above the national poverty rate of 15.4 percent, with rural counties being the hardest hit, facing poverty rates over 20 percent. Oregon will use this report to help us further understand where needs exist as we implement the Strategic Plan. You may access the report, *Moving from Poverty to Prosperity in Oregon*, at the following link: http://www.oregon.gov/ohcs/pdfs/2015-Report-on-Poverty.pdf

The Oregon Individual Development Account (IDA) Initiative was created to bring state agencies, private non-profit and tribal partners, and private contributors together to create opportunities for low income Oregonians. Partners include the State of Oregon, under the leadership of Oregon Housing and Community Services Department, the Oregon Department of Revenue, and a host of private partners and sponsors working together to help Oregonians achieve their dreams. The Initiative is managed by a statewide 501(c)3 organization, Neighborhood Partnerships. The initiative is designed to help low income Oregonians fulfill an educational goal, develop and launch a small business, restore a home to habitable condition, or purchase equipment to support employment. Oregonians who participate in the program to save funds typically receive a program match of three dollars for every one dollar saved. The matching funds are provided by private contributors through a state tax credit. In 2015, the Oregon Legislature passed legislation expanding the purposes that people with low incomes can save for to include a vehicle, first and last month's rent, and other important assets.

As discussed above, the LIFT Housing Program's purpose is to build new affordable housing for families with children who are experiencing, or at-risk of homelessness. In 2015, the Oregon Legislature committed new revenue generated from general obligation bonds to the program. Oregon Housing and Community Services (OHCS) is working with the Department of Human Services (DHS) and the Housing Stability Council (HSC) to develop a plan to use the newly committed funds efficiently and maximize the impact those funds will have in communities across the state.

OHCS partners with the Department of Human Services to use TANF funds to address crisis and short-term needs that put low-income families with children at risk of becoming homeless. Efforts continue to strengthen and expand this program as well as replicate similar partnerships with other state departments.

Describe actions planned to develop institutional structure.

Oregon's institutional delivery structure system's strengths are through collaboration and coordination with our partners. Following are some of the ways Oregon and our partners are working to enhance coordination and implementation of the Consolidated Plan:

- A Coordinated Entry system is a standard assessment tool. Systems are currently being developed and implemented by Oregon Continuums of Care, and supported by OHCS. The standard assessment tool identifies need, eligibility, support, and availability of services, allowing acceleration of assessment and placement.
- Every five year a Statewide Coordinated Statement of Need (SCSN) and Comprehensive Plan are submitted to the United States Department of Health and Human Services, HIV/AIDS Bureau. The SCSN planning process provides a collaborative mechanism to identify and address significant care and treatment issues related to the needs of people living with HIV/AIDS, and to maximize coordination, integration, and effective linkages across all Ryan White Program sections.
- Technical assistance to help cities and counties navigate the CDBG program requirements are provided by OBDD-IFA.

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

OHCS delivers rental assistance services through a statewide network of CAAs, which is also the statewide system for delivery of anti-poverty services, including the Community Services Block Grant (CSBG). CAAs work extensively with governmental entities, nonprofits, mental and physical health providers, schools, public safety providers, and others to design, implement, and deliver programs and services to low-income individuals and families.

Community Action Agencies provide information and referrals to the public and are key participants in their respective Continuums of Care, which enables them to be a community

hub for linking low-income people to mainstream supportive services. CAAs maintain partnerships with systems of care to ensure coordination, and to avoid duplication of services.

The Department of Human Services (DHS) uses TANF funds to address crisis and short-term needs that put low-income families with children at risk of becoming homeless. OHCS partners with DHS in this effort, and works to strengthen and expand this program as well as replicate similar partnerships with other state departments.

Oregon Continuums of Care are designing and implementing a coordinated entry process. The tool works to access both visible and hidden barriers. Reaching across disciplines increases the possibility of touching upon a cross section of life skills support, substance and or alcohol abuse treatment, anger management, counseling, and other areas that may help a person maintain housing stability.

In 2015, the Oregon Legislature approved an expansion of the Housing Council to become the Oregon Housing Stability Council and include additional members to enhance coordination between public and private housing and social service agencies. The Housing Stability Council and the Community Action Partnership of Oregon are key networks that work to ensure a statewide continuum of housing and services for low income households, people experiencing homelessness, and special needs populations.

Program Specific Requirements (AP-90)

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

Community Development Block Grant Program (CDBG)

Projects planned with all CDBG funds expected to be available during the year are identified in the Projects Table. The following identifies program income that is available for use that is included in projects to be carried out.

The estimated percentage of CDBG funds that will be used for activities that benefit persons of low and moderate income identified below within number 2 of the other CDBG requirement is calculated for a consecutive period of three years (2015-2017)

Table 11- Use of CDBG Funds

1. The total amount of program income that will have been received before the start of the next program year and that has not yet been reprogrammed	0
2. The amount of proceeds from section 108 loan guarantees that will be used during the year to address the priority needs and specific objectives identified in the grantee's strategic plan.	0
3. The amount of surplus funds from urban renewal settlements	0
4. The amount of any grant funds returned to the line of credit for which the planned use has not been included in a prior statement or plan	0
5. The amount of income from float-funded activities	0
Total Program Income:	0

Other CDBG Requirements

1. The amount of urgent need activities	0
2. The estimated percentage of CDBG funds that will be used for activities that benefit persons of low and moderate income. Overall Benefit - A consecutive period of one, two or three years may be used to determine that a minimum overall benefit of 70 percent of CDBG funds is used to benefit persons of low and moderate income. Specify the years covered that include this Annual Action Plan.	95% 2015-2017

There is no program income expected for the CDBG program before the start of the program year, nor the remaining items identified under point 2-5 in the CDBG section above.

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

OHCS does not offer any other form of investment beyond those identified in 24 CFR 92.205 for the HOME program.

A description of the guidelines that will be used for resale or recapture of HOME funds when used for homebuyer activities as required in 92.254, is as follows:

OHCS does not operate a HOME funded homebuyer program.

A description of the guidelines for resale or recapture that ensures the affordability of units acquired with HOME funds? See 24 CFR 92.254(a)(4) are as follows:

OHCS does not operate a HOME funded homebuyer program.

Plans for using HOME funds to refinance existing debt secured by multifamily housing that is rehabilitated with HOME funds along with a description of the refinancing guidelines required that will be used under 24 CFR 92.206(b), are as follows:

OHCS does not use HOME funding to refinance existing debt.

Housing Trust Fund (HTF)

Provide a description of how the HTF funds will be used to assist first time homebuyers. Provide a description of the guidelines that will be used for resale or recapture of HTF funds when used for homebuyer activities as required in 92.254, is as follows:

OHCS does not plan tooperate a homebuyer program funded by HTF.

Provide a description of the guidelines for resale or recapture that ensures the affordability of units acquired with HTF funds? See 24 CFR 92.254(a)(4) are as follows:

OHCS does not plan tooperate a homebuyer program funded by HTF.

Plans for using HTF funds to refinance existing debt secured by multifamily housing that is rehabilitated with HOME funds along with a description of the refinancing guidelines required that will be used under 24 CFR 92.206(b), are as follows:

OHCS does not plan to use HTF funding to refinance existing debt.

Emergency Solutions Grant (ESG)

Include written standards for providing ESG assistance

Subgrantees are required to comply with OHCS minimum standards, develop agency standards, or comply with standards set by their Continuum of Care for providing ESG funds. Subgrantees must verify their compliance with OHCS minimum standards and/or submit their proposed standards for OHCS approval through the Master Grant Agreement funding application process. Compliance with ESG standards is also included in OHCS monitoring of subgrantees. OHCS minimum written standards are provided to grantees through the Emergency Solutions Grant Operations Manual. The standards may be found in the Appendix, Attachment B.

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

Oregon is not a collaborative applicant for any of its Continuums of Care, but does provide funding and support to assist with the development of the HUD required centralized or coordinated assessment system, performance measures, and other required activities. All seven state continuums are in the process of establishing coordinated assessment systems through the leadership and facilitation of OHCS subgrantees.

If the jurisdiction is unable to meet the homeless participation requirement in 24 CFR 576.405(a), the jurisdiction must specify its plan for reaching out to and consulting with homeless or formerly homeless individuals in considering policies and funding decisions regarding facilities and services funded under ESG

As the state recipient, OHCS is not required to comply with the homeless participation requirement of 24 CFR 576.405(a).

Identify the process for making sub-awards and describe how the ESG allocation available to private nonprofit organizations (including community and faith-based organizations).

The distribution of ESG program funds is completed through a Master Grant Agreement funding application process between OHCS and its Community Action Network subgrantees. The Master Grant Agreement is the legal, contractual agreement utilized for disbursement of OHCS administered anti-poverty grant funds.

OHCS is legislatively required to utilize the Community Action Agency (CAA) network as its primary service delivery mechanism of ESG funds at the local level. The CAA network serves as the foundation of the OHCS homeless services delivery structure. The network coordinates with multiple local and statewide partners to establish linkages that maximize housing stabilization efforts and address the diverse needs of people experiencing or at risk of homelessness while avoiding duplication of services.

Sixteen designated community action nonprofit agencies and local government entities, and a statewide farmworker organization, submit biennial funding applications to OHCS for homeless funding including ESG. The applications include program work plans and budgets detailing the

proposed targeting and utilization of the ESG funds. Applications are reviewed by program staff for organizational capacity, needs-based population targeting, utilization of the funds, and feasible program strategies to meet federal and state delivery requirements and priorities. Additionally, each subgrantee's knowledge of community needs, extent of engaged partners, historical delivery capacity and success are reviewed. Funds are allocated by formula, determined by three criteria: severe housing burden, poverty and homelessness, and made available upon approval of each subgrantee's application and execution of their MGA.

Describe performance standards for evaluating ESG.

OHCS continues to refine data collection reporting requirements. In addition to obtaining household and demographic data, OHCS's subgrantees are responsible to provide data for the following two performance standards:

- 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 households experiencing homelessness that exited to permanent housing and retained that housing for six months or longer.
- Planning is underway to add additional performance measures that align with HUD's required CoC system performance measures. Once identified, additional measures will be implemented in the 2017- 2018 state fiscal year.

Housing Opportunities for People with HIV/AIDS (HOPWA)

The following question has been added to this section for the HOPWA Program per HUD guidance:

- Does the action plan identify the method for selecting project sponsors, including providing full access to grassroots faith-based and other community organizations?

OHA is the grantee for HOPWA formula funding and directly carries out program implementation. OHA does not administer the program through project sponsors.

APPENDIX

ATTACHMENTS

A CDBG Method of Distribution A-1

B ESG Operations Manual B-1

C Certification *(available after public comment period)* C-1

D Standard Form 424 *(available after public comment period)* D-1

E Citizen Participation Documentation

E-1 - Public Comment Period Notice E-1

E-2 – Constant Contact Announcement E-2

E-3 – List of categories of recipients of the Constant Contact Announcement E-3

E-4 – List of Media Newspapers placements of the Public Notice E-4

E-5 – WebPage Posting of 2017 Proposed Annual Action Plan E-5