**POLICY TEMPLATES / SAMPLES**

Subgrantees may use the following policy templates as samples to develop their own organization policies with the minimum requirements identified by Oregon Housing and Community Services. Copy the template language onto a separate document and add additional elements as needed, such as your letterhead or other format for simplicity and consistency with your organization’s policies. If using any template, be sure that it is created as a stand-alone policy and is not combined with other policies or documents.

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# ANTI-DISPLACEMENT AND RELOCATION ASSSISTANCE POLICY

It is the policy of this organization to:

* 1. Provide uniform, fair and equitable treatment of persons whose real property is acquired or who are displaced in connection with Oregon Housing and Community Services-funded projects;
  2. Ensure relocation assistance is provided to displaced persons to lessen the emotional and financial impact of displacement;
  3. Ensure that no individual or family is displaced unless decent, safe, and sanitary housing is available within the displaced person's financial means;
  4. Help improve the housing conditions of displaced persons living in substandard housing; and
  5. Encourage and expedite acquisition by agreement and without coercion.

Our organization will:

* 1. Provide relocation advisory services to displaced tenants and owner occupants;
  2. Provide a minimum 90 days written notice to vacate prior to requiring possession;
  3. Reimburse for moving expenses within the limitations set below; and
  4. Provide payments for the added cost of renting or purchasing comparable replacement housing within the limitations set below.

*(detail your organization’s response to the following – more information on reasonable and standardizes moving expenses and housing payment can be found at:* [*https://www.hud.gov/sites/dfiles/OCHCO/documents/1378c3CPDH.pdf*](https://www.hud.gov/sites/dfiles/OCHCO/documents/1378c3CPDH.pdf)*)*

* + 1. Identify methodology used to determine moving expenses limitations; and
    2. Identify methodology used to determine payment for the added cost of comparable replacement housing.

# CALCULATING INCOME POLICY

It is the policy of this organization that income be calculated consistently between applicants of the same program in Oregon Housing and Community Services-funded programs.

*(detail your organization’s response to the following)*

1. Identify what method your organization will use as a standard to calculate income eligibility; and
2. Identify if any exceptions are allowed to this standard and what under what conditions or criteria will be required to be met to vary from the standard income calculation and identify how income will be calculated under this exception.

# CHILDCARE IN SHELTER POLICY

It is the policy of this organization that childcare services be provided to resident of shelters to attend meeting, appointments or to do job search activities in Oregon Housing and Community Services-funded shelters.

*(detail your organization’s response to the following):*

1. Identify how your organization mitigates liability and risk when providing childcare services;
2. Identify whether on-site care is available and when;
3. Identify whether off-site care is available, where and when; and
4. Identify steps residents must take to obtain childcare.

# CONFIDENTIALITY POLICY

It is the policy of this organization that applicant and participant information is obtained, maintained and retained in a confidential manner in Oregon Housing and Community Services-funded programs. Confidential records include all applications, records, files, and communications relating to applicants for, and participants of, this organization’s programs, regardless of hard-copy or electronic format. All records will be maintained within state guidelines for the proper retention and destruction of records. All organization officers, employees and agents are aware of, and comply with this organization confidentiality policy as written and acknowledge such awareness, in writing.

When records are maintained in hard copy, such records will be kept secure, limiting access to only those persons who have a legitimate interest in and are responsible for applicant/participant records.

When records are maintained electronically, this organization and its officers, employees and agents securely maintain all confidential information and ensure that:

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

All organization records are open for review to federal, state, and subgrantees’ auditors and/or examiners in the course of their regular audits and monitoring functions of this organization’s OHCS-funded programs.

# CONFLICT OF INTEREST POLICY

It is the policy of this organization that in the performance of work funded by Oregon Housing and Community Services (OHCS) no officer, director, agent or employee of the organization or of a subrecipient organization will create a potential or actual conflict of interest, as defined by ORS Chapter 244. A conflict of interest exists if, among other things, a decision or recommendation could affect the finances of this organization’s or its subrecipient’s officers, agents or employees or the finances of their officer’s, agent’s or employees’ relative. If a conflict of interest exists, this organization’s or its subrecipient’s officers, agents or employees must always give notice of the conflict, and in some situations the officer, agent or employee is restricted in their ability to participate in the matter that presents the conflict of interest. No employee of this organization or its subrecipients or other affiliated organization may carry out the initial evaluation required to obtain services for any person in which an actual or perceived conflict of interest does or would exist, unless in rare circumstances it is in the interest of the participant for the expediency of housing placement services or to create a seamless service delivery while keeping the participant engaged in services and such situation is documented in the participant file.

The provision of any type or amount of assistance is not conditioned on an individual’s or household’s acceptance or occupancy of emergency shelter or housing owned by this organization, its subrecipients or any affiliated organization with this organization. Conflict of interest waivers regarding rent assistance and rental agreement requirements can only be approved by Oregon Housing and Community Services.

No employee of this organization or its subrecipients or other affiliated organizations will steer potential renters to units owned or operated by this organization or its subrecipients or other affiliated organizations, if the renters will be using a rent subsidy paid with any OHCS funds.

For the procurement of goods and services, this organization and its subrecipients comply with the codes of conduct and conflict of interest requirements under 24 CFR 85.36 (for governments) or 24 CFR 84.42 (for private nonprofit organizations).

Persons for whom the conflict of interest requirements apply include any person who is an employee, agent, consultant, officer or elected or appointed official of this organization or its subrecipients. No person who exercises or has exercised any functions or responsibilities with respect to activities assisted under OHCS-funded programs, or who is in a position to participate in decision-making processes or gain inside information with regard to activities assisted under OHCS-funded programs, can obtain a financial interest or benefit from an assisted activity; have a financial interest in any contract, subcontract or agreement with respect to an assisted activity; or have a financial interest in the proceeds derived from an assisted activity, either for him or herself or for those with whom he or she has a family or business tie, during his or her tenure or during the one-year period following his or her tenure.

*(detail your organization’s response to the following)*

1. Identify how and how often employees, agents, consultants, officers or elected or appointed officials of your organization or your subrecipients are notified of your confidentiality policy;
2. Outline your process for employees or subrecipient/affiliated organizations to disclose, in writing, any potential or actual conflict of interest;
3. Identify the process your and your subrecipients will follow when notice of a perceived, potential or actual conflict of interest is received and such process must include procedures for staff when employees, board members, friends or family members apply for program services; and
4. Identify how records are kept of perceived, potential or actual conflicts of interest.

# DUPLICATION OF BENEFITS POLICY

It is the policy of this organization that funds shall not be issued to participants if they duplicate benefits that have already been issued through other sources. This organization ensures that benefits are not duplicated in Oregon Housing and Community Services-funded programs by first identifying to see if any payment for the services has been issued. If a duplicate benefit is erroneously issued, this organization will return the duplicative payment to the funder within 30 days of when such error is noted.

*(detail your organization’s responses to the following)*

1. Identify how you will ensure that benefits will not be duplicated; and
2. What system(s) you use to check for duplicated benefits.

# ELDERLY RENTAL ASSISTANCE SUBSIDY POLICY

It is the policy of this organization that Elderly Rental Assistance (ERA) funds, an Oregon Housing and Community Services-funded program, can be provided to clients as a rent subsidy. When clients are assisted with ERA rent subsidy, subsidy amounts will be calculated consistently to all clients under the same formula to determine how much subsidy a client will receive. Units for which ERA subsidy is provided must receive and pass a Habitability Standards inspection, specific to the ERA program. The client must have an executed rent/lease agreement and this organization will execute an Agreement with the landlord for the purpose of the ERA rental subsidy. Documentation will be reviewed during monitoring and costs will be disallowed without sufficient documentation of the ERA-Based Rental Subsidy Assistance requirements as identified below:

*(detail your organization’s response to the following)*

1. Identify how tenants will be selected to participate in the subsidy program;
2. Identify how often tenants will be assessed for continued assistance and what factors are considered in the assessment;
3. Identify under what conditions a subsidy agreement would be terminated;
4. Identify the notification process, and or remedies, of such termination;
5. Identify how often welfare checks or case management checks are to be conducted;
6. Identify what factors will be used in a formula that determines how much rental subsidy a tenant will receive; and
7. Identify the limitation on the length of ERA Rental Subsidy, if any.

# EMERGENCY SHELTER ANIMAL POLICY

It is the policy of this organization that when animals are allowed to enter and stay in shelters with shelter participants that the safety and welfare of all residents and staff is observed and maintained at the highest level. Shelters in Oregon Housing and Community Services-funded shelter programs will adhere to the following policies when allowing animals to stay in its shelters.

*(detail your organization’s response to the following)*

* + 1. Identify what type of pets are acceptable (dog breed restrictions are prohibited);
    2. Identify how many pets are acceptable (per person or per shelter limitation);
    3. Identify whether muzzles or leashes are required, when and where;
    4. Identify the requirements on waste clean-up;
    5. Identify what happens when guidelines are not met;
    6. Identify whether there are any animal facilities (such as kennels) available, and under what rules can clients use them;
    7. Identify if there are any requirements for cleanliness of animal or proof of current vaccinations/shots and what are those requirements (or process by which clients could obtain services for these issues?) and
    8. What is the process for addressing pet aggression behavior or other pet concerns raised by either staff or shelter users/residents?

# EQUITY AND RACIAL JUSTICE POLICY

PLEASE NOTE: THIS POLICY WILL NOT BE REQUIRED IN THE 23-25 BIENNIUM. MORE INFORMATION TO DEVELOP AN EQUITY AND RACIAL JUSTICE REQUIREMENT WILL BE PROVIDED IN THE 25-27 BIENNIUM.

# GIFT CARD POLICY

It is the policy of this organization that the use of gift cards be rare, for very specific housing-related goals and only when other options are not available. Gift cards will not be used for events as a means of attracting applicants, but must be specific to clients receiving services and in support of a client’s written housing goals. Gift cards will not be used as a standard way of delivering program services allowable under other components of Oregon Housing and Community Services funds, such as rent assistance, deposits, hotel/motel costs, etc. Gift cards will not be used for the purchase of food, except as within the limitations identified below:

* 1. When gift cards are used for homelessness prevention activities for food, costs are limited to a one-time (per fiscal year) emergency benefit, when other resources are not available for this service and at a maximum amount of the standard for SNAP benefit (<https://www.fns.usda.gov/snap/recipient/eligibility>) for one month, based on household size, inclusive of any grocery delivery fees. Clients receiving this service must be connected to SNAP benefits and if needed, assistance must be given to help a client apply for SNAP benefits. Steps taken to ascertain that other food resources were not available to meet the emergent need must be documented in the client file.
  2. When gift cards are used for rapid re-housing activities to facilitate a client out of homelessness and into permanent housing, costs for food are limited to a one-time emergency benefit, when other resources are not available for this service and at a maximum amount of the standard for SNAP benefit (<https://www.fns.usda.gov/snap/recipient/eligibility>) for one month, based on household size, inclusive of any grocery delivery fees. Clients receiving this service must be connected to SNAP benefits and if needed, assistance must be given to help a client apply for SNAP benefits. Steps taken to ascertain that other food resources were not available to meet the emergent need must be documented in the client file.

The cost to purchase gift cards will be allocable, within program guidelines and will adhere to internal controls and in compliance with OMB 200.403, 200.303; follow this organization’s policies for procurement and will meet the intent of ORS 458.650(1), showing a connection to housing stabilization. Costs will be disallowed if documentation does not support the use of the gift card or if the purchase and use of the gift card does not follow this organization’s policy.

Gift cards will be purchased and issued to clients within the same grant period. For any gift cards that are not issued within the same grant period in which they were purchased, other funds will be used for the purchase of gift cards and corrective entries will be entered into OHCS’ OPUS fiscal system.

Issuance of gift card will be in context to a client’s action plan or goal designed to increase housing stability and documentation will clearly identify how the issuance of the gift card is helping client to obtain or maintain housing stability.

A written, legible, wet signature statement from client is required and must be kept in the client file that identifies purpose and intent of gift card and includes the client’s acknowledgment and agreement to the receipt of the gift card under the intended purpose.

There must be evidence of the eligible expense associated with items purchased with the gift card. Receipts of items purchased with a gift card must be kept in the client file. If there is no receipt of purchase using the gift card, the cost will be disallowed.

*(detail your organization’s response to the following)*

* + 1. Identify under what conditions you will use gifts cards rather than providing assistance through conventional means, such as partnerships with service providers, checks for goods/services to providers, or voucher options (i.e., why are other options of providing assistance not available?).
    2. Identify internal controls on how gift cards are purchased and issued to clients within the same grant period
    3. Identify how gift cards are secured, who will have access to gift cards and how the issuance of gift cards is tracked.
    4. Identify the per client, dollar limitation for gift cards and frequency limitation for how often a client can receive a gift card. Identify how such limitation are tracked to ensure compliance with the limitation.

# GRIEVANCE AND APPEALS POLICY

It is the policy of this organization that applicants and participants have the right and opportunity to grieve/appeal any decision that terminates, denies, limits, reduces or modifies benefits for any reason in Oregon Housing and Community Services-funded programs. Resolution of grievance or appeal request will be at the lowest level possible. Applicants/Participants will be notified of their right for a grievance or appeal of such decision, in writing, and this organization’s grievance and appeal policy may be posted in a public place frequented by applicants and participants. If an applicant is denied benefits, the applicant must receive a notice, in writing, of the reason for denial, even if the reason for the denial is a lack of funding.

Written notices provided to applicants and participants will include the following:

1. Applicants and participants have the right to contest any decision by the organization that terminates, denies, limits, reduces or modifies any benefits;
2. Applicants and participants wishing to contest any such decision may do so by requesting an administrative review or appeal of such decision, in writing, within 30 days of the date the applicant or participant was notified of the decision;
3. An explanation for the reason for any termination, denial, limitation, reduction or modification of any benefit will be given to the applicant or participant;
4. Any person or persons can complete the administrative review/appeal, other than the person who made or approved the decision under review/appeal or a subordinate of this person;
5. Final determinations of an appeal or grievance will be made to the applicant or participant in writing; and
6. This organization will notify Oregon Housing and Community Services of the final determination within 10 days following the final determination of the appeal/grievance request.

*(detail your organization’s responses to the following)*

1. Identifies how (verbally, in writing, uses a specific form, etc.) an applicant/participant can appeal or aggrieve a decision and must include a statement that the applicant/participant has the right to present written or oral objections before a person other than the person (or a subordinate of that person) who made or approved the decision;
2. Identifies the specific steps to an appeal/grievance; and
3. Identifies how the applicant/participant can request reasonable accommodations when needed for language, mobility or disability barriers that would prevent them from participating in the review/appeal process.

# INTERNET-RELATED FEES, TAXES AND EQUIPMENT POLICY

It is the policy of this organization to first connect clients with the Affordable Connectivity Program (ACP) is a [Federal Communications Commission (FCC) program](https://www.fcc.gov/ACP) that helps low-income households pay for internet service and connected devices, in Oregon Housing and Community Services-funded programs. If eligible, a household can receive up to $30/month discount on internet service; up to a $75/month discount if the household is on qualifying tribal lands; and a one-time discount of up to $100 for a laptop, tablet, or desktop computer (with a co-payment of more than $10, but less than $50. More information can be found at: <https://acpbenefit.org/>.

If during the assessment of a client’s needs it is determined that the above services do not appropriate meet the needs of the client, it is the policy of this organization that assistance provided to recipients of Oregon Housing and Community Services-funded programs be limited to no more than $300 per biennium. Any assistance provided for this expense must be when such obligation for the expense is held in the client’s name. Such process will be applied consistently for all clients served by OHCS-funded programs.

Clients must submit a copy of their billing statement. If such a billing statement is not made available, this organization will perform outreach to the internet provide to acquire a standardized monthly internet service cost list. If either of these options is not available, this organization will use the process below to determine the appropriate amount of assistance.

*(detail your organization’s process and methodology for determining the amount of assistance that will be paid for internet-related fees, taxes and equipment)*

# LIMITED ENGLISH PROFICIENCY POLICY

It is the policy of this organization to comply with Federal government rules and regulations in ensuring that information and services are equally provided to persons with limited English proficiency, which includes those who have difficulty reading, writing, speaking, or understanding English, and/or do not use English as their primary language in Oregon Housing and Community Services-funded programs.

*(detail your organization’s response to the following)*

1. Identify what actions your organization takes to identify LEP populations in your service area and cite any source(s) used for the evaluation;
2. Define what actions your organization takes to provide language assistance and address language barriers;
3. State how and how often staff receive training about assisting LEP persons; and
4. Identify how often LEP populations are evaluated (must be a minimum of biennially) and how updates to the LEP Policy incorporates any needed changes to address new or emerging LEP populations.

# MAXIMUM DURATION AND AMOUNT LIMITATIONS POLICY

It is the policy of this organization that the duration of assistance provided to recipients is limited I n Oregon Housing and Community Services-funded programs. It is also the policy of this organization the amount of assistance provided to recipients is limited. Such limitations are consistently applied for all household receiving services/assistance.

*(detail your organization’s response to the following – this policy can be used for general limitation or specific limitation such as 3 months of rent arrears rather than the OHCS limitation of 6 months. Any limitations identified can be less than OHCS limits, but cannot exceed OHCS limitations)*

* + 1. Identify rationale for limitations;
    2. Identify the maximum duration of assistance (number of months, if specific to program or service, specify such programs and services and the number of months of assistance for each);
    3. Identify the maximum amount of assistance (if specific to program or service, specify such programs and services and the maximum amount of assistance for each);
    4. Identify how such limitations are communicated in advance to eligible participants;
    5. Identify any conditions that would warrant an exception to the policy and the process required to grant such exception; and
    6. Identify how such limitation are monitored by your organization to ensure adherence to this policy.

# NON-DISCRIMINATION POLICY

It is the policy of this organization to comply with all state, federal or local statutes, rules and guidelines for all protected classes and will not take any of the following actions based on race, color, national origin, age, religion, gender, familial status or disability (federal) or victims of domestic violence, marital status, sexual orientation, gender identity or source of income (state):

* 1. Refuse to accept an application for housing assistance or services;
  2. Deny an application for housing assistance or services;
  3. Set different terms, conditions or privileges for housing assistance or services;
  4. Provide different or specific housing, facilities or services;
  5. Falsely deny that housing is available for inspection or rental or that services are available; or
  6. Deny anyone access to a facility or service.

Screening criteria used by this organization is not discriminatory and is consistently applied to all applicants or participants.

This organization adheres to the Fair Housing Act which prohibits discrimination based on protected classes in the housing activities of advertising, screening and unit rentals. If this organization uses a target population for any funding, such use will not be cause to refuse to accept an application or provide services to any protected class, even if any protected class does not fit into this organization’s targeting strategy.

Applicants or participants needing reasonable accommodation to access assistance or services may request such accommodation. Applicants or participants must be notified that they have the right to request reasonable accommodation.

*(detail your organization’s response to the following)*

1. What is the process used to communicate the ability to request a reasonable accommodation to applicants/participants; and
2. How are reasonable accommodation requests processed.

# PRIVACY NOTIFICATION POLICY

It is the policy of this organization to ensure that participants are notified of their right to privacy in Oregon Housing and Community Services-funded programs. The following information will be provided to every participant either in writing or verbally. If this information is provided to the participant in writing, a copy of that written notification will be attached to the participant’s file. If this information is provided verbally, the participant file will be documented that this information was provided to the participant verbally.

“Personally identifiable information is protected by federal laws (Privacy Act of 1974, as amended) and will be collected for the purpose of determining program eligibility, providing assistance/service, data collection, reporting and monitoring. Personally identifiable information will be shared with Oregon Housing and Community Services and other state agencies with an information sharing agreement with OHCS and are administering programs that serve the same or similar clients or populations, as is necessary to carry out the intent of an assistance or service program for the benefit of the person applying for such assistance or service and will be disclosed to Oregon Housing and Community Services without written authorization.”

If participants sign a Release of Information, in addition to the information noted above, such release will include the following statement:

“Refusal to sign such authorization cannot be the basis for denying program services to otherwise eligible applicants/participants. Applicant/Participant refusal to sign a Release of Information does not negate the inclusion of personally identifiable in secure reporting to Oregon Housing and Community Services. Oregon Housing and Community Services will de-identify applicant/participant demographic data for the purposes of reporting”.

# REMOTE APPLICATION AND DOCUMENTATION POLICY

It is the policy of this organization that the order of preference for documentation be first third-party documentation, secondly intake/case-worker observation (documented in writing) and thirdly by self-certification in Oregon Housing and Community Services-funded programs. In documented cases when applicants are unable to apply for assistance in person or to have in-person contact with this organization or its subrecipients throughout the application and service delivery process, the application and documentation process may be performed in a remote manner.

When the need is determined and documented, applicants who apply for assistance and provide eligibility or other documentation remotely can do so via electronic and through other options; e.g., phone, email, text, electronic messaging, mail and other electronic or remote means. Eligibility and other documentation will be kept in each applicant/participant file to meet eligibility and monitoring requirements. If using a remote option, identity verification of the applicant/participant must be kept in the client file.

Use of remote application and documentation will be applied equitably across services that use or are supported by Oregon Housing and Community Services funding and where allowed by the funding source.

*(detail your organization’s response to the following)*

1. Identify in what circumstances a remote application and documentation process will be used;
2. Identify how the identity of the applicant/participant will be ascertained;
3. Identify how the verification and documentation of qualification for assistance in relation to program eligibility criteria will be ascertained (such as income and housing status);
4. Identify when remote verification and documentation is appropriate for ongoing demonstration of eligibility; and
5. Identify how notifications will be provided to such applicants/participants (such as privacy notification and grievance/appeal notification).

# SAFETY IN SERVICE DELIVERY POLICY

It is the policy of this organization that staff exercise appropriate safety when delivering services in the field and that they adhere to the safety practices identified by this organization when such services are funded by Oregon Housing and Community Services.

*(detail your organization’s safety practices that employees must adhere to when performing street outreach activities)*

# SUBRECIPIENT MONITORING POLICY

For the purposes of Oregon Housing and Community Services-funded programs, the term “subrecipient” shall mean any of this organization’s subcontractors, contractors, vendor, subrecipients and any subcontractors, contractors, vendors or subrecipients of a subcontractor, contractor, vendor or subrecipient. It is the policy of this organization that its subrecipients will follow program intent, rules and guidelines for the expenditure of funds.

All subrecipients will comply with all program rules and regulations as noted in the program’s operations manual, the OHCS executed grant agreement/contract, inclusive of any Program Element: Scope of Work. Records of subrecipient monitoring performed by this organization or by this organization’s subrecipient will be available to be reviewed during OHCS monitoring and will be maintained by this organization and available for review by OHCS or other authorized entity, in compliance with OHCS program rules.

At least once during each biennium, this organization will monitor the activities and expenditures of its subrecipients to ensure compliance with the OHCS grant agreement/contract and program rules and requirements; and achievement of performance goals.

This organization’s monitoring of its subrecipients includes:

1. an evaluation of each subrecipient’s risk of non-compliance with rules , regulations, and terms and conditions of any applicable subaward for purposes of determining the appropriate level and type of subrecipient monitoring;
2. a review of financial and performance reports;
3. a review of subrecipient policies and procedures, forms, documents, client records including notifications and documentation, to ensure compliance with all program, state and federal rules, regulations and requirements;
4. a review of participant records to ensure compliance with security, maintenance, retention and destruction of records; and
5. follow-up on all deficiencies pertaining to any OHCS funding in accordance with all program rules and regulations.

*(detail your organization’s response to the following)*

1. Identify frequency of subrecipient monitoring if not once during a biennium or the term of the Master Grant Agreement (which it must be minimally);
2. The number of relevant samplings of fiscal transactions per program;
3. The number of relevant samplings of participant files and that such review includes eligibility, notifications, and documentation; and
4. The number of relevant samplings of HMIS entries to ensure appropriate entry and tracking of participant information and service transactions.

# TRANSITIONAL HOUSING RE-ASSESSMENT POLICY

Is the policy of this organization to use transitional housing funding from Oregon Housing and Community Services to assist participants build ownership and responsibility in paying housing costs. Paying the tenant’s share of the rent is counterproductive to service delivery. This organization will use a formula-based reassessment as identified below for all clients and standardize the rent amount to be paid for transitional housing clients. This organization ensures that the there is consistency in the use of such standards.

*(detail your organization’s response to the following)*

1. Identify the frequency of income/rent ration formula reassessments or what event(s) will trigger a reassessment;
2. Identify any limitation on frequency of reassessments (such as no income reassessments will occur within 90 days of the previous assessment, etc.); and
3. Identify the methodology of the formula that will be used for reassessments.

# VEHICLE REPAIR/INSURANCE POLICY

It is the policy of this organization that payments that allow participants to use public transportation are the highest priority and must be considered first for the purpose of attending required appointments, job search or other critical services in Oregon Housing and Community Services-funded programs. At the discretion of the case manager, the costs to repair a client’s personal vehicle may be preferred, which may include the cost of gas and insurance.

Such costs may only be considered when the client is receiving case management services and has completed a client services/housing stability plan. Case managers must document why a client’s personal vehicle option is preferred over public transportation options and that the expense will lead to the stabilization of housing. Car repairs for a vehicle not owned by the client are not allowed and client must have a valid driver’s license.

Oregon Housing and Community Services funds cannot be used to build assets, such as the purchase of a vehicle or loan payments and cannot be used for debt payments, insurance to pay for roadside assistance (such as a membership to AAA) or payment of fines for traffic violations or any collection costs associated with these fines. Private transportation options can include minor vehicle repair, car insurance, and the least costly option for vehicle registration. Insurance includes only general liability insurance as required by the State of Oregon; however, comprehensive/collision coverage, can be allowed, but only when there is documented evidence that such coverage is a requirement of a vehicle loan in the client’s name.

Private transportation options can be approved under the following conditions:

*(detail your organization’s response to the following)*

1. Identify the dollar limitation per participant and the frequency of such limitation (e.g., once per biennium);
2. Identify the number of months limitation per participant for insurance costs;
3. Identify what factors will be used to determine whether such costs are preferable or most cost effective than public transportation; and
4. Identify how such an expense will be justified and documented in the client’s file.