

**Emergency Housing Assistance Program (EHAP)
Elderly Rental Assistance (ERA)
State Homeless Assistance Program (SHAP)
July 1, 2025**



**State Houseless Funds
Program Operations
Manual**

Contacts

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NOTE: If a statute, rule, contract or guidance does not expressly prohibit an activity or expense, it does not mean that the activity or expense is allowable. Statutes, rules, contracts and guidance are meant to express how funds are intended to be used.

Contact OHCS for prior approval before using any OHCS funds for an activity or expense if it is not addressed in statute, rule, contract or guidance. Failure to do so may result in the disallowance of an activity or expense and may result in remedies afforded in contract. It is an incorrect assumption to believe that because language does not say you cannot do something, that it must mean you can. OHCS provides guidance around what is disallowed from frequently asked questions; however, this does not mean to encompass everything that is disallowed.

Contact OHCS for any questions on how to expend OHCS funds if what you want to do is not covered by statute, rule, contract or guidance prior to the use of funds.

NOTE: Guidance in this manual is specific to the programs identified in this manual. Unless specifically stated, any other guidance from other manuals produced by OHCS does not apply to these programs and are not comparable or transferable.

1. Program Summary

The general purposes of these programs are to provide an individualized approach to houseless and unstably housed households that includes an assessment of individual needs, identification of appropriate solutions that may include services, coordination with other programs and resources and appropriate monitoring and evaluation of houseless households' individual progress. This guidance is for EHAP GF, EHAP DRF, SHAP and ERA (as identified below).

The **Emergency Housing Assistance Program** (EHAP) provides state funds to supplement OHCS programs and/or establish new programs designed to prevent and reduce houselessness. **EHAP** program funding comes from state general funds (GF) and the Document Recording Fee (DRF). This manual will use EHAP GF and DRF to differentiate between the funding sources. DRF funding requires separate tracking and reporting of participants and expenditures. Twenty-Five (25%) percent of DRF awards (ORS 294.187) must be expended on the veteran population (program delivery and financial assistance) and will require that subgrantee's draw funds from separate OPUS categories for tracking purposes.

The **State Homeless Assistance Program** (SHAP) provides operational support for emergency shelters and services for houseless individuals and families. **SHAP** program funding comes from state general funds.

The **Elderly Rental Assistance** (ERA) provides state funds to defray the cost of rental housing for very-low-income households that are unstably housed and at risk of houselessness, where at least one household member is 58 years or older. ERA's only allowable use of funds is for Houselessness Prevention activities to align with the statutory intent of the program and cannot be used for any other category of program funding. **ERA** program funding comes from state general funds.

2. General Program Requirements

(A) *Program Standards*

Subgrantee/subrecipients **must** adhere to all program standards as identified in the Homeless Services Section (HSS) Program Standards Guidance. **Failure to adhere to program standards will result in audit findings and may put subgrantee/subrecipient funding at risk.** The HSS Program Standards Guidance includes requirements related to policies and procedures, along with general requirements for financial management of HSS grants, data requirements and records requirements. HSS Program Standards apply to EHAP GF, EHAP DRF, ERA and SHAP and align across HSS programs. It is **critical** that subgrantee/subrecipients understand their responsibilities in ensuring that they are following all program and funding requirements. Inclusion of the HSS Program Standards Guidance ensures that subgrantees/subrecipients and OHCS has a central location for the consistency of program standards across multiple programs. Find the HSS Program Standards Guidance on the OHCS website at: <https://www.oregon.gov/ohcs/for-providers/Pages/index.aspx>.

(B) *Client Service or Housing Stability Plan*

Case management is one of the primary services offered to individuals and families who face multiple challenges, including severe mental illness, addiction, and houselessness. Effective case management includes **assessment, planning, implementation, coordination and evaluation**. Best practices in case management skills are available on the [OHCS Homeless Services Section dashboard](#).

A Client Service/Housing Stability Plan is needed when:

- 1) A client is receiving more than one-time only services;
- 2) Required by the program, based on the type of assistance or services provided to the client;
- 3) A subgrantee/subrecipient is unable to assist a client with the entirety of their funding request. For example, a client owes six months of rent arrears and the subgrantee/subrecipient is only able to cover three months of that arrears. A plan would be needed to determine how the client will be able to avoid eviction and remain housed so that the three months of assistance covered by OHCS funds is not just a debt payment. Minimally, the client stability plan in this case, should document referrals, such as budgeting classes, housing navigation, long-term rental assistance programs, SOAR, assistance in obtaining other needed services, etc., that were provided and the subgrantee/subrecipient's best effort to assist the client in understanding how they can stabilize their situation.
- 4) A client is receiving hotel/motel voucher as part of an emergency shelter strategy and are receiving **more than 14 days** of hotel/motel voucher assistance within a fiscal year, they must have a client service or housing stability plan, documenting minimally the referrals provided, such as budgeting classes, housing navigation, long-term rental assistance programs, SOAR, assistance in obtaining other needed services, etc., and the subgrantee/subrecipient's best effort to assist the client in understanding how they can stabilize their situation.

Plans are required to be client driven, using input and goal setting by the client. An existing and active client service/housing stability plan from other providers can be shared and amended for purposes of OHCS-funded programs.

A Client Service/Housing Stability Plan is **NOT** needed when:

- 1) A client is assisted within an Inclement Weather Centers. If hotel/motel vouchers are used in lieu of an inclement weather center, where there are no inclement weather centers or they exceed capacity, then a client service/housing stability plan is also not required.
- 2) Temporary stays in emergency shelter in which the client is **not** receiving case management activities.

3. Applicant Eligibility

Applicant Eligibility	Emergency Housing Assistance (EHAP GF/DRF)	State Assistance Program (SHAP)	Elderly Rental Assistance (ERA)
Houseless Status	<ul style="list-style-type: none"> literally houseless imminent risk other federal statutes fleeing DV unstably housed 	<ul style="list-style-type: none"> literally houseless other federal statutes fleeing DV 	<ul style="list-style-type: none"> imminent risk unstably housed
Income Requirement	80% or below area median income	no income requirements	50% or below area median income
Age	N/A	N/A	One member of household is 58 years or older

(A) **Household Composition**

“Household” means an individual living alone, family with or without children, or a group of individuals who are living together as one economic unit. For **ERA**, one member of the household must include a member that is 58 years of age or older. For **EHAP DRF** veteran set-aside, one member of the household must include a veteran.

(B) **Legislatively Targeted Populations for EHAP DRF**

The legislatively targeted population for **EHAP DRF** is veterans (ORS 294.187). Subgrantees/Subrecipients must expend a minimum of 25% of EHAP DRF funds on households that include a veteran. DRF Allocations in OPUS will require that funds for households with a veteran be provided for the purpose of program delivery and financial assistance and must equal 25% of the DRF award.

(C) *Housing Status*

Houseless households are eligible to receive **EHAP GF/DRF** and **SHAP** funded services and financial assistance.

Unstably housed households are eligible to receive **EHAP GF/DRF** and **ERA** funded services and financial assistance.

Eligible applicants of OHCS-funded services must meet one of the following categorical definitions of houseless or unstably housed:

Category 1: Literally Houseless—Individual or family who lacks a fixed, regular, and adequate nighttime residence, meaning:

- Living in a primary nighttime residence that is a public or private place not designed for or ordinarily used as a regular sleeping accommodation for human being, including a car, park, abandoned building, bus or train station, airport or camping ground; **OR**
- Living in a supervised publicly or privately operated shelter designated to provide temporary living arrangements (including congregate shelters, transitional housing, and hotels or motels paid for by charitable organizations or by federal, state or local government programs for low-income individuals); **OR**
- Exiting an institution where he or she resided for 90 days or less **AND** who resided in an emergency shelter or place not meant for human habitation immediately before entering that institution.

Category 2: Imminent Risk of Houselessness—Individual or family who will imminently lose their primary nighttime residence provided that:

- The primary nighttime residence will be lost within 21 days of the date of application for homeless assistance; **AND**
- No subsequent residence has been identified; **AND**
- The individual or family lacks the resources or support networks, e.g., family, friends, faith-based or other social networks, needed to obtain other permanent housing.

Category 3: Houseless Under Other Federal Statutes—Unaccompanied youth under 25 years of age, or families with children and youth, who do not otherwise qualify as homeless, but who:

- Are defined as homeless under Section 387 of the Runaway and Homeless Youth Act (42 U.S.C. 5732a), section 637 of the Head Start Act (42 U.S.C. 9832), section 41403 of the Violence Against Women Act of 1994 (42 U.S.C. 14043e-2), section 330(h) of the Public Health Service Act (42 U.S.C. 254b(h)), section 3 of the Food and Nutrition Act of 2008 (7 U.S.C. 2012), section 17(b) of the Child Nutrition Act of 1966 (42 U.S.C. 1786(b)) or section 725 of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11434a); **AND**
- Have not had a lease, ownership interest, or occupancy agreement in permanent housing at any time during the 60 days immediately preceding the date of application for homeless assistance; **AND**

- Have experienced persistent instability as measured by two moves or more during the 60 days period immediately preceding the date of applying for homeless assistance; **AND**
- Can be expected to continue in such status for an extended period of time because of chronic disabilities; chronic physical health or mental health conditions; substance addiction; histories of domestic violence or childhood abuse (including neglect); the presence of a child or youth with a disability; or two or more barriers to employment, which include the lack of a high school degree or General Education Development (GED), illiteracy, low English proficiency, a history of incarceration or detention for criminal activity, and a history of unstable employment;.

Category 4: Fleeing/Attempting to Flee Domestic Violence—Individual or family who:

- Is fleeing, or is attempting to flee, domestic violence, dating violence, sexual assault, stalking, or other dangerous or life-threatening conditions that relate to violence against the individual or a family member, including a child, that has either taken place within the individual's or family's primary nighttime residence or has made the individual or family afraid to return to their primary nighttime residence; **AND**
- Has no other residence; **AND**
- Lacks the resources or support networks, e.g., family, friends, and faith-based or other social networks, to obtain other permanent housing.

Category 5: Unstably Housed—Individual or family who:

- Is rent-burdened, defined as paying more than 30% of their gross income in rent (documented income/rent amount); **OR**
- Is currently paying more than the Fair Market Rent, defined by HOME FMRs (<https://www.oregon.gov/ohcs/compliance-monitoring/Pages/rent-income-limits.aspx>) or Small Area FMRs, as applicable (with documented income/rent amount); **OR**
- Is at risk of losing their housing, and does not otherwise qualify as homeless or imminent risk under the above listed (1-4) categories, provided that:
 - They have been notified to vacate current residence or otherwise demonstrate high risk of losing current housing (rationale for high risk of losing current housing must be documented and kept in the client file); **AND**
 - Lack the resources or support networks to retain or otherwise obtain other permanent housing (must be evidenced by documentation in the client file).

(D) Income

If a person is assisted with **EHAP GF/DRF** and is residing in shelter, there is no income eligibility requirement.

For persons assisted with **EHAP GF/DRF** or **ERA** that are not in shelter, such persons are required to meet income eligibility requirements.

If a person is assisted with **SHAP**, regardless of whether sheltered or unsheltered, such persons are not subject to income eligibility requirements.

If a person, not residing in shelter, is/was employed and fleeing domestic violence, but leaving behind earned income to do so, the client file must have documentation of the loss of employment to qualify for a no-income eligibility criteria; otherwise, they must meet **EHAP GF/DRF** income eligibility requirements as identified below (if residing in shelter, no income eligibility requirement apply):

EHAP GF/DRF-provided services require applicants to be low-income; i.e., gross household income at or below 80% of area median income (as determined by HOME AMI limits located at: <https://www.oregon.gov/ohcs/compliance-monitoring/Pages/rent-income-limits.aspx>).

ERA-provided houseless prevention services require applicants to be very-low-income; i.e., gross household income at or below 50% of area median income (as determined by HOME AMI limits located at: <https://www.oregon.gov/ohcs/compliance-monitoring/Pages/rent-income-limits.aspx>).

Income includes the current gross income of all adult household members. Income earned by household members who are minors or full-time students **and** are not considered heads of household is excluded.

Subgrantee's process for determining income eligibility and the documentation required must be consistent with OHCS program requirements.

Subgrantees' policies and procedures **must** identify what method they will use to calculate income eligibility and income eligibility must be calculated consistently between applicants of the same program. Subgrantees must ensure that subrecipients have policies/procedures that align with OHCS requirements and are consistent with the intent of such a policy/procedure as outlined by OHCS. OHCS retains the right to require modification of any policy/procedure that in its determination does not meet basic principles or requirements of such a policy/procedure.

Documentation methods may include:

- Previous 12 months of income;
- Year-to-date income divided the number of months included in the year-to-date income; or
- Previous 30 days (or the previous 60 days or other specified period of days) of income.

Convert periodic wages to annual income by multiplying:

1. Hourly wages by the number of hours worked per year (2,080 hours for full-time employment with a 40-hour week and no overtime);
2. Weekly wages by 52;
3. Bi-weekly wages (paid every other week) by 26;
4. Semi-monthly wages (paid twice each month) by 24; and
5. Monthly wages by 12.

To annualize other than full-time income, multiply the wages by the actual number of hours or weeks the person is expected to work.

A “Snapshot” of current income can be used **as an exception** to subgrantee’s policies and procedures, when warranted and documented in the client file. **“Snapshot” Method** means the process of determining the estimated annual income that uses a “snapshot” of the household income at the time of application. It does not rely on a specific period in the past to determine the annual income amount. The method must only be used when a household’s income has recently changed drastically and is not expected to change from the time of the snapshot (such as in a recent job loss) or when income tends to be very volatile. The snapshot method **cannot** be used to avoid accounting for income.

- (1) Standardization: Subgrantees/subrecipients have the discretion to calculate income standards in a manner best suited for the organization, based on their own policies/procedures. Example policies/procedures include using a year-to-date amount divided by the number of months in the year-to-date amount; using the last 30 days of paystubs or the last 60 days of paystubs. The main requirement is that the way income is calculated is consistent between clients. Exceptions to the standard way of calculating income must be identified in policy/procedure (such as circumstances in which a snapshot method is used).
- (2) Consistency: Subgrantee/subrecipient must be consistent in how income calculation standards are applied, even if that means it excludes someone from being able to be assisted. Subgrantee/subrecipient cannot use the most current paystub for one person, the last 30 days for another, and a year-to-date for someone else, especially if the fluctuating use shows that it is being done to under-calculate income. Income calculation standards **must** be documented in policy/procedure and such policy/procedure will be subject to OHCS monitoring.
- (3) Client quit a job: If an applicant/client quits their job within the past 30 days and meets other eligibility, assistance may still be provided; however, the income can be calculated on the “snapshot” method. The snapshot method is an exception to a standardization of income calculation and must be identified in the subgrantee/subrecipient policy/procedure as well as documented in the client file as to why the exception was granted.
- (4) Overtime and Bonuses cannot be excluded from income calculations. Income cannot be excluded just because it would put the applicant/participant over the income limit. Year-to-date income methodology is an effective way to determine income when income is varied and includes overtime or bonuses.
- (5) Income from a live-in aide is not considered part of the income determination; however, a live-in aide **must** meet the following criteria:
 - a. Live-in aide means a person who resides with one or more elderly household member, or near-elderly household member, or member of the household with disabilities, and who:
 - i. Is determined to be essential to the care and well-being of the household member;
 - ii. Is not obligated for the support of the household member;

- iii. Would not be living in the unit except to provide the necessary supportive services; and
 - iv. Provides documentation of payment for the live-in aide services.
- (6) Child tax credits, Earned Income Tax Credits, Stimulus Payment and Tax Refunds are not considered income.
- (7) Self-employment: When calculating self-employment, use the previous year's tax information, if available. Use the gross income and subtract out the deductions claimed on Schedule C to get a net income. Schedule C is the Profit and Loss form used for a Business, which deducts expenses, such as their vehicle, supplies, offices expenses, travel, utilities, etc. The net income is then divided by 12 and the result is used for the household's monthly income.

More information on income can be found on the OHCS website in the Income Inclusions and Exclusions form.

(E) Assets

Unstably housed (category 5) housing status requires that households lack the resources to obtain or retain permanent housing. Documentation of assets **must** be completed when using category 5 housing status. Such assets are not counted as income, unless an income is derived from such assets, i.e., dividends on investments, stocks, digital currency, etc. Income derived from assets must be counted as part of the household's available income for eligibility purposes. Assets that may be liquidated are expected to be used prior to the issuance of any OHCS financial assistance.

(F) Veteran Status

Eligible applicants for **EHAP DRF** veterans funding must meet one of the following conditions as documented with original discharge papers or DD214 Identification or other acceptable Veteran's Affairs documentation:

- (1) Served on active duty with the Armed Forces of the United States for an identifiable period of time as further defined in ORS 408.225 and was discharged or released from active duty under honorable conditions; **OR**
- (2) Received a combat or campaign ribbon or an expeditionary medal for service in the Armed Forces of the United States and was discharged or released from active duty under honorable conditions; **OR**
- (3) Is receiving a non-service-connected pension from the United States Department of Veterans Affairs; **OR**
- (4) Includes a person who served in the military, naval, or air service that has been discharged or released from that service and has been determined by the United States Department of Veteran's Affairs to be eligible to receive any benefit from that Department.

Documentation of veteran status may include evidence of receiving any benefit from the Veteran's Affairs Department, such as a signed statement on the letterhead of a Supportive Services for Veteran Families (SSVF) provider. Veterans have up to 12 months from the date of application in which to provide documentation of eligible veteran status. If desired, a

template “Veteran Status Documentation Extension” form is available to subgrantees/subrecipients on the OHCS website. If documentation is not received within 12 months of the date of application, EHAP DRF funds drawn from the veteran set-aside cannot be used for assistance/services and subgrantee must rebook the costs with another allowable funding source, such as regular EHAP DRF or EHAP GF. If funds cannot be rebooked, they must be repaid to OHCS within 30 days.

(G) U.S. Citizenship

There is no applicant/participant United States citizenship requirement to be eligible for **EHAP GF/DRF**, **ERA**- and **SHAP**-funded assistance.

(H) Oregon Residency

Services must be provided to those residing and intending to reside within the state of Oregon; however, there is no length of time prior to receiving services or financial assistance in which a participant had to have been a resident in the state of Oregon.

If a household’s documented housing status is Category 4, Fleeing Domestic Violence, **EHAP GF/DRF** and **SHAP** can be used for eligible categorical costs associated with moving out of Oregon to a safe location, providing that there is documentation in the client’s service/housing plan, indicating that the client’s destination has been confirmed as an available safe, housing option and that no funds are used for rent, hotel/motel, utilities or other services in a state other than Oregon. Such allowable costs are restricted to moving costs.

OHCS does not require strict adherence to an organization’s service boundaries within Oregon; however, some clients may start intake and assessment with one organization and then find housing or move to another organization’s jurisdiction. OHCS recommends that organizations coordinate with one another to meet the needs of the client, or one organization can provide a soft hand-off to another organization for continued support. Roles and responsibilities should be clearly identified between the organizations to effectively support the client.

4. Allowable Program Components and Expenditures

Emergency Housing Assistance (EHAP GF/DRF)	State Homeless Assistance Program (SHAP)	Elderly Rental Assistance (ERA)
<ul style="list-style-type: none"> • Street Outreach • Emergency Shelter & Transitional Housing Operations • Financial Assistance • Program Delivery • Rehab, Renovation • Emergency System and Strategy Strengthening • Engagement Incentives 	<ul style="list-style-type: none"> • Street Outreach • Emergency Shelter Operations • RRH Financial Assistance • RRH Program Delivery • Rehab, Renovation 	<ul style="list-style-type: none"> • HP Financial Assistance • HP Program Delivery

Please note, this table is not intended to reflect OPUS categories.

(A) General Guidance

Follow requirements identified in the HSS Program Standards Guidance.

Twenty-Five (25%) percent of the DRF award must be expended on the veteran population for program delivery and financial assistance and will require that subgrantee's draw funds from separate OPUS categories for tracking purposes.

(B) Street Outreach (Program Delivery)

EHAP GF/DRF and **SHAP** funding can pay for street outreach services. Street Outreach is service delivery that targets unsheltered houseless individuals and households. Street Outreach is drawn from the Program Delivery category of the grant.

Street outreach includes reaching out to people who **do not otherwise seek assistance**. Street outreach involves going outside of the agency to connect with individuals and households (non-clients) where they build rapport and meaningfully engage with unhoused individuals and families for assessment, eligibility screening, and case management so that subgrantee/subrecipient can assist them in obtaining permanent housing. Street outreach includes connecting with individuals and households experiencing houselessness who may be disconnected or alienated from supports and services and is focused on moving people into permanent housing without preconditions for receiving assistance.

OHCS encourages the use of multi-disciplinary approaches and partnerships with culturally responsive, healthcare-focused, or other specialty outreach services. Leveraging various fund sources to pay for health services, such as through Medicaid, should be explored whenever possible. It is expected that any health professionals providing specialty outreach services have proper credentialing and licensure through relevant governing bodies (e.g., Oregon Health Authority, Mental Health and Addiction Certification Board of Oregon).

1) Requirements for the delivery of Street Outreach:

- a) Employs engagement strategies focused on building rapport as identified in this Section.
 - Includes basic assessment of needs that engages with the individual or household to get an understanding of factors related to immediate health and basic needs, vulnerabilities, and risks, and any other related factors. This does not necessarily need to be a formalized assessment tool and completing an assessment tool (such as coordinated entry assessment) is not a precondition for receiving street outreach services.
- b) Safety in service delivery – the subgrantee must have a written policy/procedure (such policy/procedure must be made available to OHCS upon request; subgrantees must ensure that subrecipients have policies/procedures that align with OHCS requirements and are consistent with the intent of such a policy/procedure as outlined by OHCS. OHCS retains the right to require modification of any policy/procedure that in its determination does not meet basic principles or requirements of such a policy/procedure) regarding staff safety in service delivery, which may include the following:

- Never go out alone. Teams of two should be considered the absolute minimum.
 - Establish a system in which threats to safety to teammates are identified unbeknownst to others while conducting street outreach.
 - The office or clinic (e.g., team members not in the field) should always know the location of outreach teams. Keep to a set schedule and use Smartphones that have GPS functionality built-in.
 - Wear matching clothing, ideally in bright colors, so the street outreach team is easily identified as the street outreach workers.
 - Linkages with crisis response teams and behavioral health support are essential, especially if outreach teams lack a behavioral health provider.
 - Use trauma-informed de-escalation training for outreach staff.
 - Use harm reduction principles: safety and comfort are two different things, as are perceived threats to safety and actual threats. Witnessing drug use is not necessarily a threat to safety, for example.
 - Create time and space for street outreach teams to debrief and process any threatening events. Trauma-informed supervision of outreach personnel is essential.
- c) Works toward connecting participants with local coordinated entry (CE) systems and as a means of connecting participants to available permanent supportive housing opportunities, if participant has this need. If participant agrees, this will include completing a CE assessment or referring them for a CE assessment/enrollment. Coordinated Entry is **not** a requirement of EHAP GF/DRF or SHAP).
- d) Street Outreach is only eligible for non-clients. Once a person is officially a client, funds for continued financial assistance and program delivery support must be funded under other eligible components (shelter, prevention, rapid re-housing).
- e) Services are person centered, trauma informed, culturally responsive and meet requirements of non-discrimination guidelines.
- f) Staff receive appropriate training, that at least covers minimum training requirements, as identified in the Training Section of the HSS Program Standards Guidance.
- g) Use of street outreach funds to provide Street Outreach **Consumable Purchases** for non-clients (such as food, tarps, sleeping bags, clothing, blankets, tents, toiletries, propane tanks, pet food, pet supplies/leashes, pet crates, etc., [veterinary services are allowable for sheltered and unsheltered clients only under Shelter Operations and require HMIS entry]) is allowable as a means of building rapport and encouraging program participation. Consumable Purchases must be delivered to the non-client where they are at and does not require them to travel or use a voucher or gift card to obtain the item (gift cards or cash equivalents, such as a pre-paid laundry card, are not allowable in street outreach). The goal must be the connection to permanent housing and subgrantee/subrecipient must utilize donations and other available resources for obtaining these consumable supplies prior to using state funds. Efforts to obtain these consumable supplies outside of using state funds **must** be documented and such document must be available to OHCS, upon request, or the subgrantee/subrecipient must be able to articulate appropriate measures taken that align with OHCS' intent

identified in this manual. Consumable purchases must meet the intent of street outreach, which is to build rapport sufficiently so that the houseless person(s) receive(s) an assessment, eligibility screening, and case management as a client (see definitions section) to assist them in obtaining permanent housing. This use of funds **must** be limited and applies only when other donations or resources are not available. Once a person is a client, they no longer receive street outreach services and are entered into other eligible categories for financial assistance and program delivery services. Subgrantee/subrecipient may track the distribution of Consumable Purchases to houseless individuals through an HMIS service transaction.

- h) Data entry - all street outreach events and services must be entered into HMIS

2) Allowable Costs for Street Outreach include:

- a) Assessment, enrollment, data entry – conducting an initial assessment of applicant basic needs and eligibility, conducting a CE entry assessment and data entry into HMIS;
- b) Street Outreach Consumable Purchases (see requirements in (1)(g) above);
- c) Providing crisis counseling;
- d) Assessing emergent health, behavioral and mental health needs and connecting and/or referring participants to these services;
- e) Collaboration with health, behavioral and mental health service providers to connect with street outreach households in the field;
- f) Connect street outreach households to appropriate shelter services where basic needs can be met, such as access to shower, laundry, food services and other shelter resources and services;
- g) Organizational costs for hosting Homeless Connect events;
- h) Marketing and outreach costs inclusive of written materials, translation and interpretation services (promotion and marketing **must** be program specific to EHAP GF/DRF and SHAP and cannot be for the purpose of general promotion or marketing of the organization or of emergency assistance in general;
- i) Cell phone costs for outreach workers; and
- j) Travel expenses incurred by outreach workers or in conjunction with outreach workers, social workers, medical professionals, or other service providers during the provision of allowable street outreach services (Street Outreach program delivery travel expenses must be expended and documented in accordance with guidance for travel identified in the Administration Section of this manual).

3) Unallowable Costs for Street Outreach include, but are not limited to:

- a) Cash or cash-equivalent funds provided to applicants/participants;
- b) Use of vouchers or gift cards/cash equivalents;
- c) Stipend or direct payment to individuals for any purpose;
- d) Personal solar or other powered generators;
- e) Over the counter medication;
- f) Phone purchases for individuals; and
- g) Veterinary or animal behavioral health services (see Shelter Operations)

(C) Emergency Shelter and Transitional Housing Operations

EHAP GF/DRF funding can be used for transitional housing facility operations.

EHAP GF/DRF and SHAP funding can be used for emergency shelter facility operations.

Emergency Shelter/Transitional Housing Operations are those costs associated with maintaining and operating emergency shelter and transitional housing facilities whose primary purpose is to provide temporary shelter and housing to houseless or specific populations of houseless households.

Program delivery services and financial assistance to clients residing in emergency shelters or transitional housing can be provided through Rapid Rehousing activities.

- 1) **Emergency Shelter (EHAP GF/DRF, SHAP)** means a facility whose primary purpose is to provide emergency shelter to houseless households or specific populations of the houseless and which do not require occupants to sign leases or occupancy agreements (inclusive of transitional shelter; however, not transitional housing). Shelters act as the “front door” of a houseless system of care. They provide emergency services including hygiene, nutrition, and safe sleep, while also helping to connect families and individuals to housing. Shelters may be congregate or non-congregate.

Emergency Shelter must:

- provide protection from the elements;
- provide space to live and securely store belongings (including ability to securely store required prescription medications);
- include kitchen/meal preparation facilities;
- include bathroom (toilet/shower) facilities;
- be free of accumulated trash and debris and all trash kept securely in closed/covered bins;
- receive regular cleaning and areas of high traffic must be regularly disinfected to reduce the spread of germs. Areas such as bathrooms, door handles and light switches must be cleaned daily and bathrooms kept free of trash/debris;
- receive frequent broom/mop cleaning, particularly in areas in which pets reside;
- appropriately dispose of hazardous materials, such as needles/sharps;
- provide access to refrigeration for required prescription medication that is needed for a resident or their pet; and
- not charge residents a fee for such shelter or shelter services.

Any building that uses OHCS funds for the purpose of shelter must meet basic habitability standards as follows (this is not the same as an NSPIRE or HQS inspection) and can be performed by subgrantee/subrecipient staff; however, documentation must be on file that such an inspection was performed at a minimum of once every funding cycle – a habitability standards checklist is available on the OHCS website, if desired:

- **Structure and materials.** The shelter building must be structurally sound to protect residents from the elements and not pose any threat to health and safety of the residents.
- **Access.** The shelter must be accessible to those with disabilities.

- **Space and security.** Except where the shelter is intended for day use only, the shelter must provide each program participant in the shelter with an acceptable place to sleep and adequate space and security for themselves and their belongings.
- **Interior air quality.** Each room or space within the shelter must have a natural or mechanical means of ventilation. The interior air must be free of pollutants at a level that might threaten or harm the health of residents (this does not mean that shelters are required to hire a professional organization to test air quality, but may purchase an inexpensive air quality tester to measure air quality on a regular cadence).
- **Water supply.** The shelter's water supply must be free of contamination and contaminants (this does not mean that shelters are required to hire a professional organization to test water quality, but may purchase test strips or a meter to test water quality on a regular cadence).
- **Sanitary facilities.** Each program participant in the shelter must have access to sanitary facilities that are in proper operating condition, are private, and are adequate for personal cleanliness and the disposal of human waste.
- **Thermal environment.** The shelter must have any necessary heating/cooling facilities in proper operating condition. This does not mean that a shelter must have air conditioning, but that any heating/cooling system being used is in proper operating condition and minimally, provides adequate heat and cooling functions.
- **Illumination and electricity.** The shelter must have adequate natural or artificial illumination to permit normal indoor activities and support health and safety. There must be sufficient electrical sources to permit the safe use of electrical appliances in the shelter.
- **Food preparation.** Food preparation areas, if any, must contain suitable space and equipment to store, prepare, and serve food in a safe and sanitary manner.
- **Sanitary conditions.** The shelter must be maintained in a sanitary condition.
- **Fire safety.** There must be at least one working smoke detector in each occupied unit of the shelter. Where possible, smoke detectors must be located near sleeping areas. The fire alarm system must be designed for hearing-impaired residents. All public areas of the shelter must have at least one working smoke detector. There must also be a second means of exiting the building in the event of fire or other emergency.

Shelters may require that residents sign or agree to a Code of Conduct, which is not the same as an occupancy agreement (see Definitions section of this manual).

Low-Barrier Shelters are a priority at OHCS. Low-barrier shelters have limited entry requirements that enable people, who otherwise are not willing or able to access shelter services, to be off the streets. Low barrier shelters must not expect residents to abstain from using alcohol or other drugs while living on-site and residents must not engage in these activities in common areas of the facility. Low barrier shelters allow pets, allow couples/families to stay together, and can provide secure storage space for personal items. Low barrier shelters do not require documentation of identification, custody, citizenship, or gender and comply with Equal Access requirements. Low-barrier shelters are a state priority and should be implemented whenever feasible. Low-barrier shelters must maintain the same standards for cleaning/sanitation and habitability as emergency shelters as identified above.

Hotel/Motel Vouchers can be used as an emergency shelter strategy in those areas and times when no appropriate emergency shelter is available or to meet the medical needs of the shelter resident(s). Subgrantee/subrecipient must have documentation on file and available for monitoring purposes, that identifies that due diligence has been performed to determine that no appropriate emergency shelter is available or that the client meets a need for non-congregate sheltering options. Hotel/motels do not have to perform inspections for habitability standards related to EHAP GF/DRF or SHAP.

Inclement Weather Centers are a short-term, drop-in and/or overnight facility that operates when temperatures or a combination of precipitation, wind chill, wind, air quality and/or temperature become dangerously inclement. Their paramount purpose is the prevention of death and injury from exposure to the elements and are an allowable use of Emergency Shelter Operation funding. When operated by a subrecipient, such subrecipient must be identified in the subgrantee's Funding Application and must be prior approved by OHCS before receiving OHCS funds and before incurring expenses that would be covered by EHA GF/DRF or SHAP. The resulting contract/agreement between the subgrantee and subrecipient must contain all required provisions from the OHCS Subgrantee Agreement/Contract. Subaward agreements must cite the correct regulations and the correct grant(s). All subrecipients must comply with all applicable program rules and regulations for the expenditure of funds as noted in this manual, HSS Program Standards guidance, the subgrantee's grant agreement/contract and Program Element: Scope of Work.

Free-Standing Temporary Shelter (FSTS), also known as tiny homes and "Pallet™" shelters, are a type of alternative shelters that do not include a foundation and are allowed under Shelter Operations as an equipment purchase. Any purchase of FSTS, regardless of procurement limitations, must be prior-approved by OHCS before purchase. Funds may also be used for the operations of FSTS.

FSTS are not considered Safe-Sleep Sites, but are physical shelters and are held to a different standard for operation. Prior OHCS approval for the purchase of FSTS is required. Complete a FSTS Pre-Approval Form, located on the HSS Dashboard. The FSTS Pre-Approval Form includes completing information on your purchase process, site location, amenities on site which is inclusive of utilities, waste management, food service, and public safety strategy, etc., as well as your shelter operation plan.

Using OHCS funds for bringing utilities to a site, requiring ground disturbance, for the purpose of operating FSTS, is unallowable.

Regardless of whether FSTS is a purchase request or if funds are used for the operations of these shelters, each FSTS location must include the following:

- Heat in each unit;
- Electricity in each unit;
- Hard-surface walls and roofing in each unit;
- The ability to close and lock a unit door;
- Showers and toilets onsite;
- Potable water onsite;

- Site cleanliness/janitorial services for regular clean-up of the site;
- Garbage collection, inclusive of “sharps” and other bio-hazard disposal;
- Food preparation facilities available onsite **or** an action plan to provide meals to shelter residents;
- Provision of subgrantee/subrecipient services to residents, such as case management, rehousing options, housing navigation, links to employment, and needed medical services, etc.; and
- That site rules are posted at the site and must include contact information for the subgrantee/subrecipient in case of emergency.

For information and instruction and a How To Guide on Building a Shelter Community, visit www.palletshelter.com.

Safe Sleep Sites are locations in which the subgrantee/subrecipient provides houseless individuals/households a safe and lawful place to temporarily place a vehicle and/or tent in which they live and provides access to human and social services.

Safe Sleep Sites must be a strategy taken when no other sheltering options are available to meet the need of housing unsheltered households. There **must** be documented evidence available for review at OHCS’ request, such as a community needs assessment or other analysis that identifies a gap in sheltering options that only Safe Sleep Site are able to fill.

To be an eligible use of Shelter Operations funds, these shelters **must** adhere to local zoning requirements and meet minimum requirements of which the end goal is to be permanent housing and subgrantee/subrecipient **must** have a written plan of operation for each site or policies and procedures that meet the same standard.

The written plan of operation (policy/procedure) of Safe Sleep Sites must be available during monitoring. Safe Sleep Sites must have a minimal level of onsite management that ensures:

- 1) Timely and appropriate responses to compliance with zoning requirements, when identified by state, local or county officials;
- 2) The safety of participants, such as security personnel or other measures that ensures participant safety;
- 3) Site cleanliness/janitorial services for regular clean-up of the site;
- 4) Garbage collection, inclusive of “sharps” and other bio-hazard disposal;
- 5) Sanitation options, such as portable toilets or access to toilet facilities;
- 6) Access to a potable water source;
- 7) Removal/towing of inoperable and/or abandoned vehicles;
- 8) Waste management that must include plan to address spills and RV waste water disposal;
- 9) Provision of subgrantee/subrecipient services to residents, such as case management, rehousing options, housing navigation, links to employment, and needed medical services, etc.; and
- 10) That site rules are posted at the site and must include contact information for the subgrantee/subrecipient in case of emergency.

b) Requirements for the delivery of Shelter Operations:

- a) Subgrantees must have an animal policy in place to ensure the safety and welfare of all residents and animals, if animals are accepted at the shelter facility, and such policy must be available to OHCS upon request. Shelters must not implement specific dog breed restrictions. Pets may include service animals and companion animals as defined in ORS 609.500(4). Subgrantees must ensure that subrecipients have policies/procedures that align with OHCS requirements and are consistent with the intent of such a policy/procedure as outlined by OHCS. OHCS retains the right to require modification of any policy/procedure that in its determination does not meet basic principles or requirements of such a policy/procedure. An animal safety policy/procedure must include:
 - i. What type of pet is acceptable (dog breed restrictions are prohibited);
 - ii. How many pets are acceptable (per person or per shelter limitation);
 - iii. Whether muzzles or leashes are required, when and where;
 - iv. Requirements on waste clean-up;
 - v. What happens when guidelines are not met;
 - vi. If there are any animal facilities (such as kennels) available, what are the rules to use them;
 - vii. 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
 - viii. What is the process for addressing pet aggression behavior or other pet concerns raised by staff or shelter users/residents.
- b) Costs to board and care for shelter residents' animals, such as boarding costs, kennels, leashes, pet food, pet toys, pet licenses, behavioral services for pets, basic veterinary services not available or inaccessible within the community (such as vaccinations, flea treatment, spay/neuter operations and such costs must be limited and reasonable), as well as transportation costs to transport an eligible pet to and from veterinary care or boarding/kennel care. **Note:** Veterinary or behavioral services provided **must** have an HMIS record of the service transaction and households must meet the definition of "client" to receive these benefits, whether the client is sheltered or unsheltered.
- c) Childcare services for residents in shelters: Childcare can be provided when needed to allow residents in shelters to attend meetings, appointments or do job search activities. Childcare service providers should be licensed. Shelters can become licensed, see OAR 413-215 for more information. Shelters can also enter into agreements with licensed childcare facilities for drop-in childcare services. Subgrantees must develop policies/procedures that identify how they will provide childcare services that mitigate liability and details when and how clients may access childcare services while they are residents of shelter. Such policy/procedure must be available to OHCS upon request. Subgrantees must ensure that subrecipients have policies/procedures that align with OHCS requirements and are consistent with the intent of such a policy/procedure as outlined by OHCS. OHCS retains the right to require modification of any policy/procedure

that in its determination does not meet basic principles or requirements of such a policy/procedure.

- d) Emergency shelter participants and persons receiving hotel/motel vouchers as an emergency shelter strategy must have the same access to essential services delivered by the subgrantee and subrecipient and/or provision of information and referral to other service providers. Essential services include: case management; child care; education services, employment assistance and job training; outpatient health services; life skills training; mental health services; substance abuse treatment services; transportation; services for special populations and mainstream income and health benefits where appropriate, etc.
 - e) When hotel/motel voucher is used as an emergency shelter strategy, damages to a hotel/motel unit that occurred while the participant was in residence of that unit can be an allowable cost of shelter operation when expenses are **reasonable and specifically itemized** by the hotel/motel voucher facility and would not be allowable if such expenses were not reasonable and specifically itemized. Such documentation must be kept in the participant's file (for example, it is not reasonable to cover the replacement of carpet over 8 years old if damaged by the guest).
 - f) Hotel/motel costs, when used as an emergency shelter strategy, includes wi-fi costs as part of the room fee, if charged separately; however, no other incidental costs are covered, such as movie rentals, room service, long-distance phone calls, etc.
 - g) Food costs, when used to prepare congregate meals is allowed.
 - h) Bed Inventory must remain current in HMIS.
- c) **Transitional Housing (EHAP/DRF)** Transitional Housing provides temporary housing **with supportive services** to individuals and families experiencing homelessness with the goal of interim stability and support to successfully move to and maintain permanent housing. TH projects can cover housing costs and accompanying supportive services for program participants for up to 24 months. TH requires clients to pay some portion of the rent. Transitional Housing is not the same as "transitional shelter", which requires no lease/occupancy agreement.

1) Requirements for the delivery of Transitional Housing Operations:

- a) Transitional Housing tenancy should be limited to less than 24 months. If more than 24 months of tenancy is needed, the client file must document the reason and a clear plan of action to move the client to permanent housing which includes time-bound activities.
- b) Participants in a TH project must have a signed lease, sublease, or occupancy agreement with the following requirements:
 - An initial term of at least one month
 - Automatically renewable upon expiration, except by prior notice by either party
 - A maximum term of 24 months
- c) Transitional Housing facilities may charge a resident (tenant) a portion of a reasonable rent, based on the resident's (tenant's) household income (no more than 30% of a

resident's annual household income); however, EHAP GF/DRF cannot be used to pay the tenant's portion of such rent.

- d) Transitional Housing requires residents (tenants) to sign a rental or occupancy agreement (this is not the same as a Code of Conduct – see Definitions section of this manual).
- e) Transitional Housing must follow the same habitability standards as emergency shelter (see the Emergency Shelter section of this manual).

d) Allowable Costs for Shelter and Transitional Housing Operations:

<u>Allowable Cost</u>	<u>Shelter Operations (EHAP/DRF, SHAP)</u>	<u>Transitional Housing Operations (EHAP/DRF)</u>
Lease or rent payments for facility	X	X
Utilities (includes water, sewer, garbage, gas, electricity, internet, phone) for facility	X	X
Security equipment, personnel or service to operate facility	X	X
Janitorial supplies, personnel and service to operate facility	X	X
Facility management (staff costs for a facilities manager to manage day-to-day operations necessary to ensure a physical environment that supports the facilities needs and core function)	X	X
Minor maintenance/repairs to facility (see Program Standards Guidance for more information)	X	X
Furnishings and appliances for shelter facility (televisions are allowable when placed and used only in common spaces, not individual rooms)	X	
Furnishings and appliances for transitional housing facility, <u>if</u> included as part of the unit and not retained by client upon move-out		X
Hotel/Motel costs as shelter operation strategy	X	
Signage that is for the purpose of providing information to users of the shelter. When signage is for the purpose of advertising or public relations, it is allowable as an administrative costs, but only when following OMB 200.421 guidance for such costs.	X	
Food for congregate shelter facility settings	X	
Childcare services for residents	X	
Pet costs	X	

e) Unallowable Costs for Shelter Operations, include, but are not limited to:

- 1) The purchase of recreational vehicles as a form of shelter is not allowable.

(D) Emergency Shelter or Transitional Housing Facilities Rehab/Renovation

[Refer to your Subgrantee Contract/Agreement for Procurement requirements]

Follow the HSS Program Standards Guidance for more detailed information on standards in rehabilitation/renovation of real property.

EHAP GF can be used for the category of rehab/renovation, of emergency shelter for those who are houseless and transitional housing for households who meet client eligibility requirements.

SHAP can be used for the category of rehab/renovation of emergency shelter for those who are houseless.

Subgrantee must notify and receive approval from OHCS of the intent to use OHCS funds for the renovation/ rehabilitation of property **prior** to using funds for this purpose.

To notify OHCS, Subgrantee must complete the online form at: <https://app.smartsheet.com/b/form/33ab4f86297c4a4c86e64a4bd2bb28e1>. Funds for renovation/rehabilitation of property must be drawn from the OPUS category identified as Rehab/Reno and is funded through a program allocation.

(E) Financial Assistance

EHAP GF/DRF can be used to support Houselessness Prevention and Rapid Re-Housing activities.

ERA can only be used to support Houselessness Prevention activities.

SHAP can only be used to support Rapid Re-Housing activities.

Houselessness Prevention are funds used to prevent houselessness and assist a participant in remaining in their current housing. Houselessness Prevention is used when a household's housing status is at imminent risk of houselessness (category 2) or unstably housed (category 5). **ERA only allows for houselessness prevention activities. Houselessness Prevention activities are unallowable in SHAP.**

Rapid Re-Housing are funds used to enable households to obtain permanent housing when they are currently houseless. Rapid Re-Housing is used when a household's housing status is literally houseless (category 1), houseless under other federal statutes (category 3) or when a household is fleeing or attempting to flee a domestic violence situation (category 4). **SHAP only allows for rapid rehousing activities. Rapid rehousing activities are unallowable in ERA.**

Financial Assistance are those costs paid on behalf of a client to meet the financial need(s) of the client. Financial Assistance can be provided to participants residing in Emergency Shelter or clients residing in Transitional Housing and can be provided to those who are Rapidly Re-Housed or to Prevent Houselessness.

Twenty-five (25%) percent of DRF awards must be expended on the veteran population for financial assistance and program delivery and will require that subgrantee's draw funds from separate OPUS categories for tracking purposes. Both Houselessness Prevention and Rapid Re-Housing can be used under the DRF grant for the purpose of assisting veterans.

1) REQUIREMENTS OF FINANCIAL ASSISTANCE

- a) Paying a **tenant's share** of transitional housing placement is not allowed. A purpose of the transitional housing service model is working with participants on building accountability and responsibility in paying housing costs which means having the income necessary to do so. Programs often have graduated rent share levels or income proportional requirements, etc., so outright paying the tenant's portion of rent is counterproductive to service delivery. Subgrantees and subrecipients can employ different degrees and approaches for flexibility so if there's a month where a participant is unable to pay rent, the transitional housing provider can reassess the current participant's income/rent ratio. Subgrantees **must** have a policy/procedure in place on income/rent formula reassessments and such policy/procedure must be available to OHCS upon request. Subgrantees must ensure that subrecipients have policies/procedures that align with OHCS requirements and are consistent with the intent of such a policy/procedure as outlined by OHCS. OHCS retains the right to require modification of any policy/procedure that in its determination does not meet basic principles or requirements of such a policy/procedure.

A Transitional Housing Formula Reassessment policy/procedure must include:

- Frequency of income/rent ratio formula reassessments or what event(s) trigger(s) a reassessment;
 - Any limitation on frequency of reassessments;
 - Methodology of formula for reassessment; and
 - A statement that formula reassessments are used consistently between participants.
- 2) **Rent payments** for a client's primary residence in which the lease/rental agreement is verified (lease/rental agreement with signature, if digital, must follow requirements for a digital signature [see HSS Program Standards Guidance]) and/or through a past due notice from the landlord. Rent payments may include a tenant's portion of a Housing Assistance Payment/Voucher rent amount when there is proof of need. A tenant's portion of a Transitional Housing rent amount is not eligible with OHCS funds. Rent can include first and last month's rent. Rent must always be paid to the landlord, not to the tenant directly.
- 3) **Mortgage payments** (inclusive of property tax) for a client must be for the client's primary home and requires third-party documentation. Arrears for mortgage payments (inclusive of property tax) cannot exceed six months and must be for the purpose avoiding foreclosure.
- 4) **Rent arrearage** means past due rent owed to a current landlord. Rent arrears is only allowable for Houselessness Prevention. Rent arrears is not allowable in Rapid Re-housing (i.e., "barrier busting"). Payment of rent arrears is restricted to 6 months past due rent, per calendar year. A copy of the lease/rental agreement may be necessary in order to determine that any lump-sum past due amount does not exceed the 6-month

limitation and to validate the tenancy. Any equity/interest/tax payments within a lease-to-own agreement are unallowable and rent arrearage would apply only to the past-due rental portion amount. Third-party documentation must be included in file for lease-to-own agreements identifying the portion of rent arrears applicable to rent and equity payments when paying for rent arrearages in a lease-to-own agreement. Subgrantees have the discretion to limit payments for rent arrearage with a policy that details such further restrictions and their purpose, and identifies how those restrictions are communicated to the participants (such policy must be made available to OHCS upon request) Subgrantees must ensure that subrecipients have policies/procedures that align with OHCS requirements and are consistent with the intent of such a policy/procedure as outlined by OHCS. OHCS retains the right to require modification of any policy/procedure that in its determination does not meet basic principles or requirements of such a policy/procedure.

- 5) **Previous Landlord Rental-related expenses** is allowable under rapid-rehousing activities and includes other expenses incurred such as rent, filing fees, property damage, court fees, late fees, lease break fees or unpaid rent owed to a previous landlord (or collection agency) **when being required by a prospective landlord**, with a case manager's supervisor's approval; however, total expenses cannot exceed 6 months of the rent amount charged at the previous unit. Previous Landlord rental-related expenses is not allowable under Houselessness Prevention (i.e., "barrier busting"). There must be **documented evidence** from the prospective landlord that payment of the arrears is necessary for the participant to obtain permanent housing and a unit **must** be lined up and available for the participant's occupancy if such expenses are to be paid.
- 6) **Rent/Lease-to-Own.** Rent payments (inclusive of late fees) are allowable when there is documented evidence of the amount owed and an active lease/rental agreement exists with the landlord. When a houselessness prevention tenant is under a rent/lease-to-own contract, a contractual monthly payment (or arrears per this manual's guidance) is allowable to keep a tenant from being houseless; however, program funds may not be used to enter into a rent/lease-to-own contract and cannot pay the portion of the rent/lease-to-own agreement applicable to an equity/interest/tax payment. OHCS program funds cannot be used for potential asset building. Client file **must** include third-party documentation that identifies the portion of payment applicable to both rent and equity payments to ensure payment covers only the rent portion. If such evidence is not provided, the cost is unallowable.
- 7) **"Roommate"** situations are areas of high fraud probability and due diligence is needed to ensure that such situations are adequately documented. Self-certifications or dependence on a client's statement **are not** valid methods of meeting documentation requirements for roommate situations.

For example, Tenant A is the "landlord" tenant, Tenant B is the "roommate" tenant. Whether Tenant B will be placed into Tenant's A unit or whether Tenant B currently lives with Tenant A, if OHCS funds are to be used for Tenant B, Tenant B must provide evidence that Tenant A has the authority to enter into a roommate agreement. Such documentation may be a copy of the amended rental agreement providing approval

of the tenancy arrangement by the actual landlord or it may be evidence that Tenant B paid an application fee to the landlord (not Tenant A) to be placed as an occupant in the unit. If a lease/rental agreement includes prohibitions for subleasing or unauthorized occupants, this could denote a fraud attempt. If the full amount is being by subgrantee/subrecipient, on behalf of Tenant B, in roommate situation to the landlord, Tenant A's income must be included for purposes of eligibility or allowable payment can only be based on Tenant B's share of the rent/utility.

If paying rent/utilities in a roommate situation to Tenant A and not the actual landlord, clear documentation of a roommate arrangement **must** include the authority document listed above (approval of the roommate arrangement by the landlord), a lease/rental agreement with wet signatures (or valid/verified digital signature) demonstrating the tenant/landlord relationship between Tenant A and Tenant B **AND** documented financial records showing a pattern of financial transactions (bank statements, money order receipts, Paypal/Venmo statements, etc.) from Tenant B to Tenant A for rent/utility payments. If such evidence does not exist, payments should be made directly to the landlord/utility company rather than to Tenant A. If, under such conditions, payments cannot be made directly to the landlord/utility company, the payment is disallowed.

Hand-written receipts and client self-certification **are not** allowed for this purpose, due to the high risk of fraud. All records must be kept in the client file for monitoring purposes.

Placing Tenant B into a roommate situation must not jeopardize Tenant A's housing stability with an unauthorized occupant.

If Tenant A is seeking assistance, Tenant A must declare the income received from Tenant B as part of their income for eligibility requirements.

Payments made must adhere to rent, rent-related and rent arrears standards.

- 8) **Manufactured home rental space "lot rent" or RV space lot** is allowable when being used for primary housing. There must be evidence of a rental/lease agreement in the client's name (meeting OHCS standards if digital signatures exist) and cannot include other provisions in the stipulated rental amount, unless expressly identified in the rental/lease agreement (i.e., utilities common in an RV space lot).
- 9) **Pet Deposit** means a security deposit required by a landlord in order to house an individual or family with a pet. This may be referred to by a landlord as a one-time pet fee at move in or a non-refundable pet deposit. This does not include a pet deposit for clients during an existing rental/lease agreement and is not allowable under homelessness prevention. Pet deposits are limited to one pet. Pet deposits for multiple pets is unallowable. Pet deposit does not include repayment of any damages caused by a pet.
- 10) **Pet Rent** means a monthly rent charged on a single pet and required by the landlord through a rental/lease agreement, which must be included in the client file for purposes of documentation. Pet rents for multiple pets is unallowable.
- 11) **Utility assistance** programs **must be deferred to first**. Utility assistance is only eligible when other utility assistance cannot be obtained and payment of utility assistance is

in the context of, and documented in, an action plan or goal designed to increase housing stability, along with documentation of the steps taken to defer to other utility assistance first. There must be documented evidence of a utility bill in the participant's name. If paying a utility deposit for a client to obtain services, there must be documented evidence of the need to pay such a deposit.

- 12) **Utility arrearage** assistance is past due utilities and can only be provided when there is documented evidence of a utility bill in the participant's name and only allowable in houselessness prevention. If arrears are owed to a previous utility company or to a collection agency, these arrears can be paid under rapid re-housing, but only when there is documented evidence that payment of the arrears is necessary for the participant to obtain utility service by the current utility company. Payment of utility arrears to a previous utility company or to a collection agency must result in the utilities being connected. Documentation in the client file must show the steps taken to defer to other utility assistance first.
- 13) **Phone services** must be in the participant's name and must only be provided for one line of service (either landline or cellular line) per household and only when such billing statement clearly identifies the costs of a single line of service, or such cost can be ascertained from the phone service provider. Arrearages are allowed, up to 6 months of service, in alignment with the limitation of a single line of service. Purchases of phones are unallowable. Connect clients to Oregon LifeLine (www.lifeline.oregon.gov) to meet the need.
- 14) **Internet-related fees and taxes, equipment** (modem/router) rental fees are allowed and must be capped at no more than \$300 per biennium and must be in the participant's name. Subgrantees and subrecipients must attempt to obtain a participant's documentation or perform outreach to the internet provider to acquire monthly internet service costs; however, if either of these options are unduly burdensome, the subgrantee **must** have a policy/procedure that applies a reasonable process to determine the amount of the bill that is applicable to the internet costs; however, total internet assistance cannot exceed \$300 per funding biennium. Such policy/procedure must be available to OHCS upon request. Subgrantees must ensure that subrecipients have policies/procedures that align with OHCS requirements and are consistent with the intent of such a policy/procedure as outlined by OHCS. OHCS retains the right to require modification of any policy/procedure that in its determination does not meet basic principles or requirements of such a policy/procedure.

Internet providers retain a "price list" which can be requested to determine the separate costs for each type of service which will provide subgrantees/subrecipients a reasonable process to determine the amount to be paid.

Connect clients to Oregon Lifeline to help meet the need for internet services (www.lifeline.oregon.gov).

The costs of internet-related fees and taxes, equipment rental fees can only be provided when there is documented evidence in a client service/housing stability plan that such payment of the expense is needed for the purpose of obtaining/retaining

permanent housing and only as a means of accessing needed services, attending required appointments or needed as part of job search.

- 15) Rapid Re-Housing funds can be used for **storage fees** – these costs are not allowable under Houselessness Prevention. If using funds for storage fees of personal items, such use of funds must be not more than three months of storage rent and provided as a means of securing a houseless person's belonging while obtaining permanent housing for the purpose of rapid re-housing only. Costs can include arrears, current or future costs or any combination of those costs for the maximum total assistance of 3 months a. Such households must be actively in the process of obtaining permanent housing with a unit lined up for occupancy and are awaiting placement in their home. Such cost is not allowable through houselessness prevention.
- 16) **Moving costs** within the state of Oregon can be provided to secure the rental of a moving van/truck and could include a transportation payment in alignment with transportation guidelines. In cases where need is demonstrated, moving costs can cover the professional expenses of a contracted moving company. Moving costs do not include cash or gift cards/cash equivalents, except as provided in the transportation guidelines. In circumstances in which a client meets the definition of fleeing domestic violence and there are safety concerns with remaining in Oregon, moving costs can be used to assist the client to safely move to another state; however, the client file must have written documentation that a safe place is available in the destination state and such allowability must be in alignment with the client's service/housing plan. This allowability does not extend to paying an out-of-state landlord for rent, security deposit, application fees, etc., and only encompasses moving costs. Moving costs do not include cleaning of the unit which the client is leaving, disposing of trash/furnishings or other costs associated with moving out of the unit.
- 17) In **Houselessness Prevention, Food** costs as 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 (for those clients that are home-bound). 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. Client file must document steps taken to ascertain that other food resources were not available to meet the emergent need. Gift cards/cash equivalents can only be used when a gift card policy/procedure has been **pre-approved** by OHCS and the limitation for food costs are identified in such policy/procedure and cannot exceed the limitation stated above.
- 18) In **Rapid Re-Housing, Food** costs when facilitating a client out of houselessness and into permanent housing as 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 (for clients that are home-bound). 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. Client file must

document steps taken to ascertain that other food resources were not available to meet the emergent need. Gift cards/cash equivalents can only be used when a gift card policy/procedure has been **pre-approved** by OHCS and the limitation for food costs are identified in such policy/procedure and cannot exceed the limitation stated above.

- 19) **Clothing** as needed for employment or when fleeing domestic violence and participant had no options to leave the situation with clothing (see definitions section in this manual). Clothing purchases are only allowable when other donations or community resources cannot be obtained and where client file identifies steps taken to ascertain that other resources are not available to meet this need (documentation of how the subgrantee/subrecipient was unable to obtain other donations or community resources to meet this need must be included in client file);
- 20) Financial assistance to provide for the installation of **housing modifications** such as temporary ramps or grab bars or rails to assist physically challenged households. When used in a rental home, devices must be able to be removed without creating damage to the property.
- 21) Purchases of **identification, driver's license and birth certificates** are allowable when needed as a support to clients that are assisted with housing stability as documented in the client's service or housing stability plan.
- 22) **Transportation:** costs, such as bus/train passes, gas vouchers, Uber/Lift/Cab fares, car repairs/insurance are allowable. Payments that allow participants to use public transportation are the highest priority and must be considered first, and such payments must be for the purpose of attending required appointments, job search or other using/obtaining other critical services. Case managers have the discretion to provide repairs/gas/insurance for a client's personal vehicle. 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. Costs associated with a vehicle not owned by the client are not allowed. Client must have a valid driver's license to allow any cost related to a client's personal vehicle.

OHCS funds cannot be used to build assets, such as the purchase of a vehicle or vehicle loan payments and cannot be used for debt payments, such as traffic violations or fines to obtain a license. Private transportation options can include minor vehicle repair, car insurance, and the least costly option for vehicle registration, with written subgrantee policy/procedure on use of funds for these services and such policy/procedure must be available to OHCS upon request. Subgrantees must ensure that subrecipients have policies/procedures that align with OHCS requirements and are consistent with the intent of such a policy/procedure as outlined by OHCS. OHCS retains the right to require modification of any policy/procedure that in its determination does not meet basic principles or requirements of such a policy/procedure.

For example, repair to a vehicle might be preferable to a bus pass if the community does not have public transportation or if the client works at night when public transportation is not operational.

Transportation does not include insurance to pay for roadside assistance (such as a membership to AAA) or traffic violations or any collection costs associated with fines

related to traffic violations. 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. Insurance is paid before the period of service and vehicle owners have 10 days in which to make payment; therefore, insurance arrears is not a factual cost and is unallowable.

A Private Vehicle Costs policy/procedure must include:

- I. Dollar limitation per participant and frequency of such limitation (e.g., once per biennium);
 - II. Number of months limitation per participant for insurance costs;
 - III. Identification on what factors are used to determine whether such costs are preferable to public transportation; and
 - IV. Identification of how justification of expense and documentation of that justification is performed. Participant files must include such documentation.
- 23) **Client Non-Categorical Services** are the rare provision of goods or payments of expenses not included in other allowable expense categories, which directly help a household to obtain or maintain permanent housing or meet a unique essential household need (“essential” is described as of the utmost importance, basic, indispensable, necessary), as documented in the client service or housing plan. Consumer debt payments are not allowed as a client non-categorical service. Client Non-Categorical Service payment cannot be made for expenses already allowed in a program category and cannot be used as a means of covering an unallowable expense. Client Non-Categorical Services is **not** a cash or cash-equivalent payment to a client and such use is unallowable, except where expressly identified in this manual. Prior approval by the case manager’s supervisor is required before goods or payments are delivered.
- 24) There are no **duration or amount of assistance** limitations imposed on subgrantees/subrecipients, with the exception of any specific limitations for particular types of services or expenses as identified in this manual (e.g., rent arrears). Subgrantees have the discretion to set a maximum number of months that a participant can receive assistance and a maximum dollar amount of assistance. The process for determining such conditions must be applied consistently for **all** households and, if subgrantee makes any such limitation, they must have a policy/procedure describing these limitations and how such limitations are determined and monitored and communicated in advance to eligible participants. Such policy/procedure must be available to OHCS upon request. Subgrantees must ensure that subrecipients have policies/procedures that align with OHCS requirements and are consistent with the intent of such a policy/procedures as outlined by OHCS. OHCS retains the right to require modification of any policy/procedure that in its determination does not meet basic principles or requirements of such a policy/procedure.

2) ALLOWABLE COSTS FOR FINANCIAL ASSISTANCE:

ALWAYS USE GUIDANCE IN THIS MANUAL FOR LIMITATION. THE TABLE BELOW IS NOT MEANT TO REFLECT ALL LIMITATIONS RELATED TO EACH ACTIVITY, BUT IS A HIGHLIGHT FOR CONVENIENCE ONLY!

Expense ERA is excluded from all Rapid Rehousing Activities. SHAP is excluded from all Houselessness Prevention Activities.	HP Allowable	RRH Allowable
Mortgage payment (inclusive of property taxes)/manufactured home payments <i>[ERA is excluded from mortgage payment allowability].</i>	X	
Housing relocation costs such as rent payments and security deposit (inclusive of first, last, pet rent, and if accepted by landlord as an incentive, forward rent).		X
Rent/mortgage arrears (limited to 6 months and ERA is excluded for mortgage payment arrears allowability).	X	
Previous Landlord Rental-related expenses		X
Rent or Lease-to-Own payments, inclusive of late fees. Lease to-Own payments do not include equity/interest/tax payment.	X	
Tenant's share of a Transitional Housing portion of rent. <i>[SHAP is excluded from Transitional Housing activities].</i>	X	
Manufactured home rental space "lot rent" or RV space lot if used for primary housing.	X	X
Utility payments (utilities include water, sewer, garbage, gas, electricity, phone, internet) (see guidance above for limitations).	X	
Utility arrearages (utilities include water, sewer, garbage, gas, electricity, phone, internet) (see guidance above for limitations).	X	X
Utilities deposits.		X
Phone services.	X	X
Internet-related fees and taxes, equipment.	X	X
Moving costs (van/truck rental) (see guidance above for limitations).		X
Storage costs.		X
Pet deposit, limited to one pet per household.		X

Pet rent, limited to one pet per household.	X	X
Application fees.		X
Clothing for employment, fleeing DV.	X	X
One-time Food benefit (see guidance above for limitations).	X	X
Installation of temporary modifications to housing for purposes of mobility.	X	X
ID, license, birth certificates.	X	X
Transportation costs, such as bus/train passes, gas vouchers, Uber/Lift/Cab fares, car repair/insurance (see guidance above for limitations).	X	X
Client non-categorical services (see guidance above for limitations).	X	X

3) UNALLOWABLE COSTS FOR HP/RRH FINANCIAL ASSISTANCE, INCLUDE, BUT ARE NOT LIMITED TO:

- a) Cash;
- b) Cash-equivalent funds provided to applicants/participants, except through an OHCS-prior approved gift card policy;
- c) Hotel/motel expenses (emergency shelter costs are covered under the Emergency Shelter component);
- d) Consumer debt payment,
- e) Home repairs and/or maintenance;
- f) For **ERA**, mortgage payments are unallowable;
- g) Civil or criminal legal services;
- h) Parking/carport/garage rent/fees;
- i) Childcare/eldercare services/nursing care/cleaning services;
- j) Renter's Insurance, even if required by landlord;
- k) Personal solar or other powered generators;
- l) Stipends or direct payment to client for any purpose;
- m) Over the counter medication;
- n) Phone purchases for clients;
- o) Property damages to a unit, except as otherwise provided in Previous Landlord Rental Related expenses.
- p) Landlord damage or loss mitigation programming; and
- q) HOA fees.

4) GIFT CARD USAGE IN FINANCIAL ASSISTANCE

Gift cards/cash equivalents (such as a prepaid laundry card) given to eligible clients for the purpose of purchasing items related to financial assistance must be in support of the client's written housing goals (client case/housing plan) and is allowable within **EHAP GF** and **SHAP** financial assistance funds only, provided that adequate documentation exists to support the purpose and the expense and there is an OHCS-prior approved Gift Card Policy/Procedure with established policies and procedure in place to address the process. Such policy/procedure must be submitted and prior-approved by OHCS during each funding application process/cycle (gift card usage is not allowable in EHAP DRF or ERA).

Use of gift cards/cash equivalents must be rare, for very specific housing-related goals and only when other options are not available. "Rare" means very unusual or not occurring often. It is not rare if, for example, 10% of your clients receive gift cards/cash equivalents, which would denote that gift cards/cash equivalents are used as a method of service delivery. There are multiple alternatives to using gift cards/cash equivalents which are highly recommended:

- Partner¹ with bus or transportation services that bill for their eligible clients.
- Partner with stores for a voucher system. A voucher is a document which is worth a maximum dollar value, and which may be used only for specific items at a specific vendor. Vouchers are very similar to purchase orders. In advance, the organization establishes agreements with a vendor under which the vendor agrees to accept a "voucher" at the point of sale and then invoices the organization for the actual purchase. The voucher is created in multiple parts with one copy being sent to the vendor, one copy given to the individual making the purchase and at least one copy retained by the organization. The voucher must be uniquely numbered and must clearly detail the allowed item(s) and the maximum cost the purchaser is allowed to spend on the item(s). The vendor invoices for the actual amount of the purchase up to the maximum established cost listed on the voucher.
- Partner with clothing stores that will bill for clothing selected by eligible clients and the clothing can be picked up once the bill is paid (for example, Salem-Keizer Schools currently has this arrangement with Kohl's).
- Online purchases. Subgrantees can use a credit card to purchase the item through an online vendor and have the item shipped. Some online vendors (such as Walmart.com) also offer a same day pick up option for items currently available in local stores. Same day pick up allows an organization to make the purchase online and specify the name of an individual(s) authorized to pick the item up at their local store.
- Employee purchase. An employee goes to a store and purchases the needed items with either a company credit card or receives reimbursement by submitting detailed receipts for allowable costs.

a) Gift Card Requirements:

- 1) Subgrantee must have prior approval of a stand-alone gift card policy/procedure by OHCS **before incurring costs for gift cards/cash equivalents**. Prior approval must occur through the funding application only. Email, text or phone calls

¹ CCB potential for increasing partnerships.

cannot be a method used for the approval of a Gift Card Policy/Procedure. Approval of a Gift Card Policy/Procedure in one biennium, does not mean approval is provided in a prior or subsequent biennium. The date in which a Gift Card Policy/Procedure is approved, is the date in which costs may be incurred for such purpose and does not allow for purchases of gift cards/cash equivalents prior to the approval date, retroactively and will be disallowed. Approval runs through the end of the biennium in which the policy/procedure was approved. The gift card policy/procedure must be prior-approved each biennium during the OHCS funding application. OHCS retains the right to require modification of any policy/procedure that in its determination does not meet basic principles or requirements of such a policy/procedure.

- 2) Subrecipients of a subgrantee **must** follow the provision of the subgrantee's approved gift card policy/procedure and all OHCS requirements for the use of gift cards/cash equivalents; however, subrecipients can create their own procedures for how they will implement the subgrantee's OHCS-approved policy (such as the position title of an approver, etc.) Subrecipients cannot have their own policy that does not comply with OHCS requirements and if funds are awarded under a policy not meeting OHCS requirements, costs will be disallowed.
- 3) Costs will be disallowed without a prior OHCS-approved Gift Card Policy/Procedure.
- 4) Gift cards/cash equivalents cannot be used as a standard way of delivering program services allowable under other components of OHCS funds, such as rent assistance, deposits, hotel/motel costs, etc.
- 5) Gift cards/cash equivalents cannot be used for events as a means of attracting applicants, but must be specific to clients receiving financial assistance and in support of a client's written housing goals (case/housing plan).
- 6) Subgrantees must document in their Gift Card Policy/Procedure the justification as to why they must 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.
- 7) Subgrantee procurement policies/procedures must be followed when purchasing gift cards/cash equivalents.
- 8) Gift cards/cash equivalents must be purchased and issued to clients within the same grant period. For any gift cards/cash equivalent that are not issued within the same grant period in which they were purchased, subgrantees must submit a negative request for funds for the grant period in which the gift cards/cash equivalents were purchased totaling the amount of the unissued gift cards/cash equivalents and other non-OHCS funds must be used for the cost of the gift cards/cash equivalents. Such negative request for funds must be submitted within 60 days after the end of the performance period (Aug 30).
- 9) Subgrantee must maintain complete record of gift card/cash equivalent purchases and issuance and gift cards/cash equivalents must be kept in a secure location.

- 10) Issuance of a gift card/cash equivalent must be in the context of an action plan or goal designed to increase housing stability and such plan/goal clearly documents, in writing, how the purpose of the gift card/cash equivalent is helping the client obtain or maintain housing stability.
- 11) Documentation will be reviewed during monitoring and costs will be disallowed without sufficient documentation.
- 12) The cost must be allocable, within program guidelines and must adhere to internal controls (OMB 200.403, 200.303) and must clearly meet the intent of ORS 458.650(1), showing a connection to housing stabilization.
- 13) Gift cards/cash equivalents for the purchase of food must follow OHCS guidance for limitation of food expenses.
- 14) Subgrantee must identify the dollar limitation for gift cards/cash equivalents per client and the frequency limitation for a client's receipt of gift cards/cash equivalents and such limitations must be reasonable as determined by OHCS.
- 15) Client must receive documentation that identifies the purpose and intent of the gift card/cash equivalent and must acknowledge, by written, legible, wet signature, the same, and such documentation must be kept in the client's file. Gift cards/cash equivalents require an in-person exchange and **must not** ever be mailed to a client.

b) Gift Card Policy/Procedure must include the following:

- 1) Justification as to why the subgrantee must use gifts cards/cash equivalents 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) If gift cards/cash equivalents will be used for food purchases, policy must clearly identify the limitations as stated in this manual;
- 3) Identifies internal controls on how gift cards/cash equivalents are purchased and issued to clients within the same grant period;
- 4) Identifies internal controls on how gift cards/cash equivalents are securely maintained, who has access to gift cards, and how the issuance of gift cards/cash equivalents is tracked;
- 5) Identifies, per client, dollar limitation for gift cards/cash equivalents and frequency limitation for how often a client can receive a gift card/cash equivalent. Additionally, policy must identify internal controls on how these limitations are tracked to ensure compliance with the limitation;
- 6) Requirement that issuance of gift card/cash equivalent is in context to a client's action plan or goal designed to increase housing stability and that such plan is included in the client file; and
- 7) Written, legible, wet signature statement from client that identifies purpose and intent of gift card/cash equivalent and acknowledging and agreeing to the receipt of the gift card under the intended purpose.

(F) Program Delivery

Program Delivery are those staffing costs associated with providing services to clients residing in Emergency Shelter or Transitional Housing facilities.

Program Delivery also applies to those who are Rapidly Re-Housed or to Prevent Houselessness.

Program Delivery are costs determined necessary to enable a household to obtain/retain their housing and achieve housing stability as identified and documented in their client service/housing stability plan (when receiving more than one-time assistance).

1) Requirements for Program Delivery activities:

- a) Case management is one of the primary services offered to individuals and families who face multiple challenges, including severe mental illness, addiction, and houselessness or are unstably housed. Effective case management must include **assessment, planning, implementation, coordination and evaluation**. Best practices in case management skills are available on the OHCS Homeless Services Section dashboard.
- b) Costs that can be directly attributed to program delivery can be paid with program funds, such as a direct staffing costs attributable to the delivery of the program (case worker, housing navigators, mediation, tenant readiness education, etc.). Indirect costs, by their nature (such as a subgrantee's utilities or maintenance of a copier used for many programs) are not a direct cost and may not be directly attributed to the delivery of program services. Indirect costs charged to program delivery must be in accordance with an organization's written cost allocation plan or Negotiated Indirect Cost Rate Agreement (NICRA) and must be consistently applied to all programs, whether OHCS-funded or not. See [OMB 2 CFR 200 Subpart E](#) for more information.
- c) Participant meal/refreshment costs associated with disseminating technical information necessary and reasonable for successful performance of HP/RRH participant education opportunities, such as tenant readiness education, financial/budgeting education and other client educational services is allowable as identified in OMB 200.432 and Oregon Accounting Manual 10.40.10 (such cost would be attributable for clients and thus would not be allowable as a shelter expense).

2) Allowable Costs for Program Delivery

- a) Staffing costs for intake, client needs assessment, data entry, data reporting, data mining and data analysis relative to HMIS;
- b) Staffing costs for case management including pre-eligibility determination for housing and other needed services;
- c) Staffing costs for housing navigation assistance;
- d) Staffing costs for crisis intervention/counseling;
- e) Staffing, and participant meal/refreshment costs, associated with the delivery of education and training in such areas as personal finance and budgeting, job search and access to job training, life skills, and literacy (see limitation above);

- f) Staffing costs associated with assistance in completing/submitting applications for other state/federal benefits (SSI/SSDI, TANF, SNAP, Unemployment, etc.);
- g) Staffing costs associated with providing referrals and/or “warm hand-offs” to counseling, addiction and mental health services;
- h) Staffing costs associated with assisting the client with linkages to family support and/or community social support networks or to perform welfare checks on clients in their own home (including travel) (Case management program delivery travel-related expenses must be expended and documented in accordance with guidance for travel identified in the Administration Section of this manual);
- i) Staffing costs for mediation services between client and landlord;
- j) Tenant readiness education staffing and material costs; and
- k) Costs to cover a program-required NSPIRE (or similar) inspection, such as required in Home Tenant Based Rental Assistance and the Emergency Solutions Grant (does not include repair/rehabilitation costs (see the Rehabilitation Section of this manual). This Program Delivery cost is not allowable under ERA; and
- l) Costs related to HMIS, including user licenses, equipment upgrade, network system upgrades, training and technical assistance for the subgrantee and to support subrecipient organizations, reporting, data quality management and end-user support and troubleshooting.

3) Unallowable Costs for Program Delivery

- a) Food, candy, treats, gifts for employees

(G) *Engagement Incentives*

EHAP GF funding can be used to support a Subgrantee’s efforts to engage **client’s** feedback and provide payment of a **client’s** participation in focus group or feedback sessions. Such engagement opportunities must include, as part of its scope, the desire to understand the housing-related needs, barriers and supports that community members identify rather than general data collection that is not related to the broad purpose of EHAP GF funds.

Use of EHAP GF for this purpose must be connected to houselessness and housing instability. If a survey opportunity incidentally discusses related topics such as food scarcity, public safety, and public health, that is permissible so long as there is a housing connection **This allowability does not extend to subrecipients of a subgrantee.** If a subrecipient wishes to use OHCS funds for this purpose, they must coordinate with the subgrantee.

Subgrantee must be responsible for the purchase of gift cards for this purpose, drawing funds from the Engagement category within OPUS, and must maintain the required documentation in the subgrantee’s file of meeting all requirements identified in this Engagement Incentive section of this manual.

Funds can be used, in the form of gift cards, for the completion of surveys, focus groups or other feedback sessions in order to further inform community needs regarding houselessness and inform program development in addressing houselessness or housing instability. Persons receiving this incentive **must** meet the definition of “**client**” as identified in this manual (this

limitation excludes those receiving Street Outreach services as those served under Street Outreach are not clients [see definition section]).

Funds used for this purpose must be budgeted and drawn from the Engagement category in OPUS and be a part of a program's allocation of funds. Use of funds for this purpose does not permit the use of gift cards for any other purpose except as described in this section. An approved gift card policy/procedure under the "Gift Card Usage" in Financial Assistance does not extend to the approval of gift cards for engagement purposes – these are two separate processes. Allowability within this program component does not include the use of cash payments and the incentive **must** be delivered through a gift card provided in a face-to-face interaction and requires a client's wet signature of acknowledgment and acceptance. Documentation will be reviewed during monitoring and costs will be disallowed without sufficient documentation of Survey Requirements and/or Engagement Requirements.

Survey Requirements:

- 1) Subgrantee must document the following;
 - a) what client population was targeted to complete the survey,
 - b) why this client population was targeted, and
 - c) the method used to solicit this client population's participation.
- 2) Survey must be focused on a specific program or policy designed to address houselessness or housing instability, which can also include community needs assessment survey completion by clients.
- 3) Surveys **are not** ongoing customer satisfaction surveys.
- 4) Surveys must minimally require that:
 - a) Clients are provided sufficient context of the purpose of the survey and how their results will be used;
 - b) Clients are engaged with in-depth questions that influence either program design, expansion of existing services or identify gaps in services;
 - c) Includes a record of client's legible name and address (or denotation of "Houseless"); and
 - d) Be limited in duration for the length of time that the survey will be open for clients to complete, with a beginning and end date that does not exceed a period of 60 days.
- 5) Subgrantee must identify and document how responses to survey were used and the outcome of the survey (i.e., how did the results change houselessness/housing instability policy or program or identify community needs).
- 6) Compensation must not exceed \$25 per client.
- 7) Employees of the subgrantee do not qualify for survey compensation, regardless of whether or not they are a client.
- 8) Subgrantee must provide compensation through gift card (not cash).
- 9) Clients must acknowledge receipt of gift card in a face-to-face interaction with written, legible, wet signature and date and must include acknowledgement, in writing, that they are engaging as an independent contractor being paid for services, and not as an employee of the subgrantee.

- 10) Clients are limited to a one-time payment for survey participation per fiscal year and the Subgrantee must have policies/procedures in place to ensure this limitation is not exceeded (such policy/procedures must be made available to OHCS upon request).
- 11) Subgrantee **must** maintain records of survey engagement which includes a copy of the survey questions, either individual or aggregate responses, outcomes, targeting information and client payment records. Records must be maintained for a period of 6 years after the date of the close of the survey.

Engagement Requirements:

- (1) Subgrantee must document:
 - a) what clients were targeted to participate in the engagement,
 - b) why this client population was targeted, and
 - c) the method used to solicit this client population's participation.
- (2) Engagement must be focused on a specific program or policy designed to address houselessness or housing instability.
- (3) Engagement opportunities can be a single session, focus group or workshop or can be a limited series of such activity. If a limited series, there must be a beginning and end date to the series and does not exceed more than 12 days of attendance in a calendar year.
- (4) Subgrantee must document times, dates and locations of engagements and must produce written minutes or notes from each engagement session.
- (5) Subgrantee must document the outcome of engagement session(s).
- (6) Engagement clients must receive compensation through a gift card (not cash).
- (7) Clients must acknowledge receipt of gift card in a face-to-face interaction with written, legible, wet signature and date and must include acknowledgement, in writing, that they are engaging as an independent contractor being paid for services, and not as an employee.
- (8) Engagement clients must minimally provide legible name and address (or denotation of "Houseless").
- (9) Compensation must not exceed \$25 for each day in which clients engaged in such activities (aggregate maximum is \$300). Each \$25 gift card must be provided only at attendance of each session (face-to-face, with written acknowledgment) and cannot be combined.
- (10) If a series of session applies, then a gift card for each session must be provided after attendance of each session.
- (11) Employees of the subgrantee do not qualify for engagement compensation, regardless of whether or not they are a client.
- (12) Clients must not participate in more than one engagement opportunity (whether a single session or a series) per fiscal biennium, and the subgrantee **must** have policies/procedures in place to ensure this limitation is not exceeded (such policy/procedures must be available to OHCS upon request).

- (13) Subgrantee must maintain records, which includes targeting information, meeting agendas, notes/minutes, outcomes, and client payment records for a period of 6 years after the final date of an engagement session or series of engagement sessions.

Gift Card Usage for Survey and Engagement Opportunities Requirements

- 1) Approval of the usage of gift cards for the purpose of survey and engagement compensation does not provide approval for the use of gift cards for any other purpose. Other uses of gift cards must be aligned with an approved Gift Card Policy/Procedures as identified in the State Houseless Funds Operation Manual's Gift Card Usage in Financial Assistance Section.
- 2) Documentation will be reviewed during monitoring and costs will be disallowed without **ALL** documentation as identified in each of the Survey Engagement and Engagement Opportunities noted above.
- 3) The cost must be allocable, within program guidelines and must adhere to internal controls (OMB 200.403, 200.303).
- 4) Subgrantee must maintain complete records of engagement gift card purchases and issuance for a period of 6 years.
- 5) The Survey/Engagement Policy/Procedure must be submitted to OHCS through the subgrantee's funding application and OHCS retains the right to require modification of any policy/procedure that in its determination does not meet basic principles or requirements of such a policy/procedure.
- 6) Subgrantee must have a stand-alone Survey/Engagement Policy/Procedure (or a separate section from a Gift Card Policy/Procedure as defined in this manual's Gift Card Usage in Financial Assistance Section) that includes:
 - a) A statement that gift cards for the purpose of compensation for surveys/engagement must be issued to EHAP GF clients (*see definition section of this manual for "client"*).
 - b) Identification of internal controls on how gift cards are purchased and issued to clients within the same grant period.
 - c) Identification of internal controls on who has access to gift cards, how gift cards are securely maintained and how the issuance of gift cards is tracked to ensure the safeguarding and oversight of gift card assets.
 - d) Identification of how subgrantee ensures that they do not exceed the per-client limitation for use of gift cards for survey or engagement purposes.
 - e) A statement of compliance with OMB 200.403, 200.303
 - f) A statement that clients must acknowledge receipt of gift card in a face-to-face interaction with written, legible, wet signature and date and must include acknowledgement, in writing, that they are engaging as an independent contractor being paid for services, and not as an employee.

(H) Emergency Systems and Strategy Strengthening

EHAP GF funding can be used to support projects and activities that increase a subgrantee's service area's capacity to provide emergency housing and houseless services to those individuals and families struggling with houselessness. The specific focus of Emergency

Systems and Strategy Strengthening (ESSS) is to enhance local houselessness systems to design and implement strategies to build, rebuild and sustain an emergency housing system – especially in deprived communities and in towns, cities and regions suffering from economic decline, worklessness and benefits dependency. The goal is to create a broader capacity and expanded ability for the emergency housing system to meet the needs of those struggling with houselessness.

This is not meant to address disaster recovery efforts. Emergency Systems and Strategy Strengthening is not the same as increasing a subgrantee's capacity to deliver OHCS funds/programs, which are service provider investments (agency capacity building). ESSS are not funds to generally support staffing costs of the subgrantee, but must be for the purpose identified in this section. The flexibility of ESSS does not extend to a subgrantee's subrecipient.

Records of ESSS activities must be kept in accordance with OHCS Records Requirements, inclusive of meeting records, outcomes, and evaluation records, along with any fiscal records associated with the project. Funds for ESSS must be drawn from the same named category in OPUS and are a part of a program allocation of funds.

1) Emergency Systems and Strategy Strengthening:

- a) Increases the range of funders² and potential contributors through community planning and implementation tables and that encourages all levels of government to participate;
- b) Assists organizations in developing networks to undertake joint activities and coordinate their services to achieve common goals and provide better service to houseless participants;
- c) Enhances or more effectively uses skills, abilities and resources of houseless service providers in a joint effort, enabling them to better serve houseless households; and
- d) Designed to increase access to services or increases available services to houseless and unstably housed Oregonians.

ESSS is not a space to simply share program information and available services with other providers which can be accomplished through marketing and outreach efforts. ESSS projects are activities that a subgrantee would not be able to undertake with regular OHCS-funded programs and specifically designed to increase the community's ability to provide houseless services and emergency assistance. Costs associated with advertising and public relations designed solely to promote the subgrantee organization and their activities are not allowable under ESSS.

OHCS-Funded ESSS projects must be defined and receive **prior approval** in the subgrantee's Implementation Report (IR) **before** costs can be incurred. Such IR will require the following elements:

- i. Provide specific outcomes or deliverables that are SMART (Specific, Measurable, Achievable, Relevant, and Time-Bound [project must have a beginning and end date]);

² See example for Funders Table

- ii. Identify specific partnerships needed to carry out the project (ESSS projects must have partnerships to be considered ESSS otherwise it is a service provider investment. For example, supporting documentation may include a Memorandum of Understanding, project charter, agreement or other document that identifies the partnership and such documentation must be submitted with the IR;
- iii. Increase the service area's capacity with the purpose of expanding the community's ability to meet the needs of its houseless or unstably housed population;
- iv. Provide a method to evaluate the effectiveness of the project;
- v. Have a specific budget that is identified and described in detail and must include leveraged resources (such as costs needed for materials, transportation, staff, procurement/service agreements, hardware/software purchases³, and any leveraged resources) and such documentation must be submitted with the IR; and
- vi. Identify what staff will be involved in the project (such as number of FTE, length of time FTE are needed, position types and staff names – this information will be needed to effectively monitor the ESSS project).

2) Example of allowable activities include:

- a) **Regional Houselessness Plan:** Sets out policy directions for addressing houselessness in the region and serve as a template for other sub-regional plans, including efforts by municipalities, neighborhoods and private foundations committed to a structured approach to addressing houselessness.
- b) **Engagement Strategies:** Adopting a membership structure to regional houselessness councils to be more inclusive, strategic and effective, providing for an open membership, a new decision-making body and opportunities for members to participate through Advisory Groups and other forums. Membership, which includes all levels of government, community foundations and agencies that provide a range of services to address houselessness in the region.
- c) **Community Houseless Tables (CHTs):** Develop CHTs to help develop local strategies and promote communication and collaboration. CHTs have created the local councils on community houselessness to help develop local strategies to address houselessness
- d) **Funders Table:** Creating a Funders Table that includes all levels of government and private and philanthropic foundations that fund local houselessness initiatives and support the vision to end houselessness. The purpose of this Table is to create a collaborative forum for regional funders to play a leadership role in: (a) Promoting a common vision for funding priorities to end houselessness; (b) Maximize resources and efficiencies for programs and services to end houselessness; and (c) Advocate for policies and systems changes that promote cross-sector coordination and permanent solutions to houselessness.
- e) **Systems Analysis:** Collection and analysis of a comprehensive set of data elements that describe a community's houseless population, the system's ability to move people to permanent housing quickly, and the system's cost-efficiency. Qualitatively analyze a system by surveying community leaders, providers including executive directors and

³ See example for system mapping or systems analysis

front-line staff, and people experiencing houselessness and involves reviewing planning and operation documents, and evaluation reports. Through training and consultation, guidance provided to the community in creating action plans to achieve identified priorities and, following a training and/or technical assistance, support implementation efforts.

- f) **Houseless Response System Assessment and Recommendations:** Work with CoCs to provide analysis and recommendations to the CoC Collaborative Applicant, CoC Governance Board and community stakeholders on implementation of best practices in crisis response systems, including reviewing core system components such as CoC Governance, Coordinated Entry, Outreach, houselessness Prevention, Diversion, Emergency Shelter, Rapid Re-Housing, Permanent Supportive Housing and others, analyze data including System Performance Measures and key housing outcomes by program type, and develop recommendations on strategies, including the role of CoC governance and its critical role in coordinating this system, to address identified challenges to ensure houselessness is rare, brief, and one time.
- g) **Rapid Re-Housing Learning Collaborative:** Develop a RRH Learning Collaborative as an opportunity for houseless services organizations to make changes in the way they operate, while being supported by their peers and rapid re-housing experts. The goal of the Rapid Re-Housing Learning Collaborative is to increase the number of households being rapidly rehoused and shorten the amount of time households remain houseless. Learning Collaboratives last a year or more, involve three to five in-person meetings, and in-depth technical assistance for participating organizations.
- h) **Emergency Shelter Learning Collaborative:** Develop an ES Learning Collaborative as an opportunity for houseless services organizations to make changes in the way they operate, while being supported by their peers and emergency shelter/houseless crisis response experts. The goal of the Learning Collaborative is to support the implementation of a Housing First or other effective approach to shelter services, increase the number of households being permanently housed, and shorten the amount of time households remain houseless. Learning Collaboratives last a year or more, involve three to five in-person meetings, and in-depth technical assistance for participating organizations.
- i) **Diversion and Problem-Solving Strategies Training:** Strategies training that involves system leaders, providers, coordinated entry staff, HMIS staff, and key community stakeholders to improve the understanding of an effective system, and the role of effective diversion practice. The training focuses on the effective implementation of problem-solving as an intervention across the houseless response system. The training begins with an overview of the effective houseless response system, then focuses on the core components of an effective problem-solving approach and defines problem-solving, diversion, and rapid exit and how these interventions are distinguished from prevention. Last, the training focuses on various diversion and problem-solving strategies, including data collection and analysis; integration with coordinated entry; and effective practices.
- j) **System Mapping:** Development of a system map of existing housing and services throughout the region with specificity on updating the information regularly – this can include a software system for which a form of crowd sourcing could be utilized.

5. Financial Management

(A) ***Fiscal Standards***

Subgrantees/subrecipients must follow fiscal standards identified in the HSS Program Standards Guidance.

(B) ***Administration***

Subgrantees are allowed to use up to fifteen percent (15%) of their total **EHAP GF/DRF, ERA** and **SHAP** allocation for administrative costs, including administrative costs for subrecipient organizations with whom the subgrantee contracts. There is an expectation that administrative funds will be shared with subrecipients (partners) commensurate to the services provided through the program by such subrecipients.

Allowable administrative costs, including indirect administration cost allocations, benefit the organization as a whole and cannot be attributed specifically to a particular program. All amounts billed to administration must be supported by actual costs. Administration funds may be used after the end of the expenditure period until the final report is due (August 30) in order to close out the grant (2 CFR 200.403(h)). If incurred, these costs must be liquidated prior to the due date of the final report(s) (Aug. 30) and charged to the final budget period of the award. Closing out grants is defined as payroll costs incurred after the end of the expenditure period, such as:

1. costs associated with completing final reports;
2. submitting final requests for funds; and
3. closing the grant within the subgrantee's/subrecipient's organization.

This allowability only applies to administrative funds needed to close out the grant, such as payroll costs for fiscal staff. This DOES NOT apply to any street outreach, shelter/transitional housing facility operations, program delivery, financial assistance, or any other category of funding, but applies only to administrative funds and subgrantee/subrecipients must be able to identify in any audit/monitoring that costs were incurred after the end of the expenditure period and were for the sole purpose of closing out the grant. All program funds must be fully expended within the expenditure period of the grant.

There is no universal rule for classifying certain costs as either direct or indirect under every accounting system. A cost may be direct with respect to some specific service or function, but indirect with respect to the award. Therefore, it is essential that each item of cost incurred for the same purpose be treated consistently in like circumstances either as a direct or an indirect cost in order to avoid possible double-charging of awards and that this consistency is included in all grants received by the subgrantee, whether or not they originate from OHCS. Indirect costs must be in accordance with an organization's written cost allocation plan or Negotiated Indirect Cost Rate Agreement (NICRA) and must be consistently applied to all programs, whether OHCS-funded or not. Subgrantee/Subrecipients **must** have a written cost allocation plan or NICRA. Guidelines for determining direct and indirect costs charged to awards are provided in OMB 200.

Travel costs must be adequately documented and support business purposes (documentation is insufficient if verifying the reservation only and not the completed travel and will be disallowed). Payment for travel expenses must be authorized in advance by the person in the subgrantee's/subrecipient's organization with the authority to approve such expenses, in writing, unless the individual has previously been approved to travel by virtue of an approved description of job duties that include travel. Reimbursement of travel expenses does not count as wages or remuneration.

Record of travel expenditures must be kept, including purpose, mileage and payment. When reimbursing for meal, lodging and travel, subgrantees/subrecipients **must** use the U.S. General Services Administration per diem rates located at: <https://www.gsa.gov/travel/plan-book/per-diem-rates> and applied consistently to all volunteers and employees, for actual and necessary expenses backed by receipts. In the case of volunteers, the cost of meals when there is no overnight stay and not associated with an official state-required business meeting is reportable as income. Any funds expended on the reimbursement of expenses for travel must be appropriately documented and cannot be provided through a cash or cash equivalent payment.

Allowable costs include, but are not limited to:

- (1) Senior executive management personnel salaries and benefits (unless they are directly involved in program operations), administrative staff travel costs;
- (2) Salaries, benefits and expenses for general services such as accounting (finance), budget development, personnel, contracting, gatekeeping, marketing, human resources, agency audit, agency insurance;
- (3) Board and commission member expenses (excluding meals), limited to \$25 per day in which they are engaged in the performance of official duties. Members can also receive travel reimbursement. Payment of these expenses cannot be made through cash, gift cards, gas cards or other cash equivalent means (ORS 292.495, DAS OSPA Reference Manual);
- (4) Organization-wide membership fees and dues specific to houseless systems and programs;
- (5) General agency facilities costs (including those associated with executive positions), such as rent, depreciation expenses for building and equipment, and operation and maintenance (as part of the organization's direct or indirect cost allocation plan); and
- (6) Equipment rental/purchase, insurance, utilities, and IT costs that are not program specific but relate to agency-wide administration.

Unallowable costs include, but are not limited to:

- (1) Late fees assessed due to a subgrantee/subrecipient failure to pay in a timely manner;
- (2) Subgrantee/subrecipient facility mortgage payments;
- (3) Food, candy, treats, gifts for employees; and
- (4) Lobbying.

(C) *Funds Spend Down*

Subgrantees/subrecipients must follow fiscal standards identified in the HSS Program Standards Guidance

Subgrantees are expected to fully expend grant funds during the grant's expenditure period. Subgrantees must meet spending targets identified in their Implementation Report spenddown plan (Standard or Time-Bound Expenditure Plan (TBEP), as applicable. OHCS will review subgrantee's grant spending in accordance with subgrantee's grant agreement/contract and OHCS guidance. Any spending below the minimum standard spending target or the time-bound expenditure plan is subject to rescission of grant funds, at OHCS' sole discretion. See Standard Terms and Condition of subgrantee's grant agreement/contract for more information. Expenditure of funds is measured by the amount drawn in OPUS.

EHAP GF and **SHAP** expenditures shall be managed by subgrantee so that services are available throughout the intended service delivery period. **EHAP DRF/VET** and **ERA** may be expended as needed and are not intended to be available throughout the service delivery period.

Any funds not drawn by 60 days following the end of the funding period (Aug 30), will be recaptured and deallocated by OHCS. Exceptions are not guaranteed; however, requests for any exception must be received prior to the 60-day deadline and **cannot** be for the purposes of late invoicing by subrecipients or lack of adequate staffing. Acceptance and approval of any exception request is at OHCS's sole discretion.

(D) Match

EHAP GF can be used to meet match requirements of federal programs for services and financial assistance to persons with low or very low income to address homelessness or housing instability. EHAP GF as a match means that funds expended were for the purpose of EHAP GF and expended on those meeting the eligibility requirements of EHAP GF and are drawn in OPUS from the EHAP GF award. Using OHCS funds as a match is not the same as supplementing another program with OHCS funds

Follow the guidance below when requesting to use OHCS funds for supplementing other programs.

(E) Supplementing Existing Funds/Programs

EHAP GF and **SHAP** funds can be used to supplement existing OHCS funds or to support existing OHCS programs or HUD-funded Continuum of Care projects/programs with the same intent and mission to address the needs of low or very low income homeless or unstably housed individuals and/or families and with eligibility criteria that is in alignment with Oregon Administrative Rules 813-046, and 813-240 and Oregon Revised Statute 458.650.

ERA funds cannot be used to supplement any programs/projects.

Use of EHAP GF and SHAP funds for supplementing another program requires **prior approval** through the subgrantee's Funding Application/Implementation Report. Funds cannot be used on incurred expenses for the supplemented program prior to the date of the approval. Supplementing a program with OHCS funds is not the same as using OHCS program funding as a match requirement to federally-funded programs.

EHAP GF and SHAP can be used in a flexible manner to absorb costs from other programs where there are mutually allowable costs insofar as the subgrantee's cost allocation policy allows for this type of flexibility and the subgrantee/subrecipient outlines the circumstances

in which they will charge other program costs to EHAP GF and SHAP. When using EHAP GF or SHAP as a supplement, funds are drawn from the EHAP GF and SHAP grant in OPUS, but funds are expended on the other program being supplemented, in which that program aligns with the purpose and intent of EHAP GF and SHAP.

When using SHAP to supplement other programs, the supplemented program **must** be designed to serve literally houseless households.

EHAP GF/SHAP cannot be used to supplement another program's activities that require prior approval by OHCS without first obtaining prior approval for the activity (e.g., rehabilitation/renovation of real property, equipment/vehicle purchase, etc.).

EHAP GF and SHAP must not be used to replace costs from another program, meaning they must be used in a manner that supplements and supports those other program operations.

Supplement means EHAP GF and SHAP funds are used to increase the available services and funding for a particular program by incurring certain costs that can be allocable to other programs. Supplementing and supporting funds is allowed. Whenever a cost is being supplemented, it must be thoroughly documented that such costs are allowable under the EHAP GF and SHAP program.

Replacement means utilizing EHAP GF and SHAP funds to completely eliminate or supplant the use of funds from another program. An example of this would be to use EHAP GF or SHAP funds to take over all the costs of a previously established grant, thus eliminating the need for the other program to bear those costs. Replacement of funds **is not allowable**. EHAP GF and SHAP must always be used in a manner that "builds upon" another grant and does not supplant or take over the work of an entirely different grant.

Subgrantees must document their rationale for when and how costs will be used to supplement the costs of other programs through a reasonable basis within their cost allocation plan and such allowable use of funds must be prior approved through the subgrantee's funding application.

6. Data, Submission and Reporting Requirements

Subgrantees/subrecipients must follow the HSS Program Standards Guidance related to data, submission and reporting requirements.

(A) **Data Entry**

Data entry is a program delivery expense.

(B) **Submissions/Reporting Requirements**

Program reporting is a program delivery expense.

7. Records Requirements

Subgrantees/subrecipients must follow the HSS Program Standards Guidance related to records requirements

(A) Case Files

A participant services or housing plan is required for those participants **receiving more than one time only** services (as identified in this manual) and must be in the case file. Existing assessments and active case plans with other providers can be used and included in the participant file.

Drop-in or mass shelter facilities that provide bed nights and no case management must maintain sign-in attendance documentation that includes shelter resident self-certification of their houseless status. All other shelter provisions, including issuance of hotel/motel vouchers as a part of shelter strategy, require that participant eligibility documentation be maintained in the participant file.

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8. Applicable Rules and Regulations

All the following as can be amended from time to time:

1. ORS 456.515 through 456.725 (OHCS): https://www.oregonlegislature.gov/bills_laws
2. ORS 458.600 through 458.650 (Oregon Housing Fund): https://www.oregonlegislature.gov/bills_laws
3. ORS 458.375: Elderly Rental Assistance Program [Rental housing assistance for very-low-income elderly persons](#)
4. OAR 166-300 (Retention Schedule): <https://secure.sos.state.or.us/oard/ruleSearch.action>
5. OAR 813-005 (General): <https://secure.sos.state.or.us/oard/ruleSearch.action>
6. OAR 813-046 (EHAP): <https://secure.sos.state.or.us/oard/ruleSearch.action>
7. OAR 813-053 (ERA): <https://secure.sos.state.or.us/oard/ruleSearch.action>
8. OAR 813-240 (SHAP): <https://secure.sos.state.or.us/oard/ruleSearch.action>
9. HMIS Data Standards Manual: <https://www.hudexchange.info/resource/3824/hmis-data-dictionary/>
10. Limited English Proficiency federal interagency website can be found at: <http://www.lep.gov/> and guidance and additional materials can be found at: https://www.hud.gov/program_offices/fair_housing_equal_opp/limited_english_proficiency_0
11. **This manual** as guidelines for EHAP GF, EHAP DRF, ERA and SHAP identified in the relative Oregon Administrative Rule (OAR).
12. **ORS** cited are amended from time to time and can be found at: https://www.oregonlegislature.gov/bills_laws/Pages/ORS.aspx
13. **OARs** cited are amended from time to time and can be found at: <https://secure.sos.state.or.us/oard/ruleSearch.action>
14. **CFRs** cited are amended from time to time and can be found at: <http://www.ecfr.gov/cgi-bin/text-idx?c=ecfr&tpl=%2Findex.tpl>
15. **OMBs** cited are amended from time to time and can be found at: <https://www.whitehouse.gov/omb/information-for-agencies/circulars>

9. Definitions

- A. **Client** means a household who has received an assessment of need, has been entered into an OHCS-funded program (intake), entered in HMIS and who is receiving financial assistance. Once a household receives financial assistance, they are considered a client.
- B. **Clothing**, unless for the purpose of fleeing domestic violence in which clothing could not be taken at the time, clothing means a specified article or articles of clothing; i.e., shoes, boots, hats, shirts, slacks, skirts, or outerwear, for an employee and required by the employer to perform the functions of the job or provide a distinctive and easily identifiable appearance in performing his or her job, and is not covered by a uniform allowance.
- C. **Code of Conduct Agreements** can be required by any type of shelter facility. A Code of Conduct Agreement can require that participants adhere to the shelter facility's rules and expectations of behavior and may or may not be required to be signed by the participant. Code of Conduct Agreements are not the same as Occupancy/Lease/Rental Agreements.
- D. **Culturally Responsive Organization** means an entity that, as determined by OHCS that:
- 1) Comprehensively addresses power relationships throughout the organization by methods that include addressing conflicts and dynamics of inclusion and exclusion;
 - 2) Has relationships with and is responsive to communities that the organization serves, including communities of color;
 - 3) Hires, promotes, trains and supports staff who are culturally and linguistically diverse in ways that reflect the communities that the organization serves, including communities of color;
 - 4) Provides culturally responsive service; and
 - 5) With respect to paragraphs (1) to (4) above, has adopted governance structures, policies, and cultural norms to hold its leadership and staff accountable and to continue improvements.
- E. **Culturally Responsive Service** means services that:
- 1) Are adapted to maximize the respect of and relevance to the beliefs, practices, culture and linguistic needs of the diverse client populations and communities being served, including clients and communities of color;
 - 2) Have the capacity to respond to the issues of diverse communities; and
 - 3) Ensures competent language access and incorporates diverse cultural approaches, strengths, perspectives, experiences, frames of reference, values, norms and performance styles of clients and communities to make services and programs more welcoming, accessible, appropriate, and effective for all eligible and intended recipients.
- F. **Domestic Violence**: This definition includes domestic violence, dating violence, sexual assault, stalking, attempting to cause, or intentionally, knowingly or recklessly causing or placing another in fear of imminent serious physical injury or emotional, mental or verbal abuse, and using coercive or controlling behavior. This does not include other criminal acts such as

violence perpetrated by a stranger, neighbor, acquaintance or friend, unless those persons are family members, intimate partners or household members.

- G. HMIS** means Homeless Management Information System. Victim Service Providers must use an HMIS Comparable Database.
- H. Occupancy/Lease/Rental Agreements** are used for temporary or permanent housing, which includes Transitional Housing. Occupancy/Lease/Rental Agreements are not the same as a Code of Conduct Agreement.
- I. Participant** means a household who may or may not be a client, but is receiving OHCS-funded services (such as case management).
- J. Priority Population** means persons that the subgrantee/subrecipient has determined as having the greatest need and will receive services first (such as veterans and houseless families with children). OHCS-required priority populations must take precedence over any subgrantee/subrecipient priority population.
- K. Rehabilitation** means action taken to return an emergency shelter or transitional housing property to a useful state by means of repair, modification, or alteration. Bringing a property to the point where it is usable, safe, comfortable, hygienic, etc., but not necessarily bringing it back to its previous state or improving the property.
- L. Renovation** means the process carried out to upgrade an existing structure for the use as an emergency shelter or transitional housing and to improve performance by either altering the scope of structure, providing additional facilities or improving existing facilities. Improving the property.
- M. Repair and Maintenance** means actions taken to keep a building at a certain level of integrity, or to restore a structure to such a condition that it can be effectively used for its designated purpose. Actions that make improvements that will raise the building to a higher level of integrity or allow the building to be used for a new activity are not considered repair or maintenance. Bringing a property back to its original condition or taking action to keep a property at its current condition.
- N. Stand-Alone Policy/Procedure** means a written policy/procedure that includes all the requirements for such a policy/procedure and is either its own separate document or it is included in a larger document, such as a policy and procedures handbook, that can easily be separated from the larger document for the purpose of approval and review by OHCS.
- O. Subrecipient** means entities that, by contract with the subgrantee agency, provides assistance payments/services and receive funding directly from the subgrantee agency. Through its agreements with subgrantee agency, subrecipients must comply with all requirements for the program. Subrecipients may include a subgrantee's subcontractors, contractors, vendor, subrecipients and any subcontractors, contractors, vendors or subrecipients of a subcontractor, contractor, vendor or subrecipient. Subrecipients are those organizations that receive OHCS funds from the Subgrantee or from the Subgrantee's subrecipient.

- P. Support Network:** Examples include family, friends and faith-based or other social networks.
- Q. Target Population** means persons a subgrantee/subrecipient wishes to reach out to who are under-represented in their service population, but delivery of funds cannot be limited to only the target population.
- R. Wet Signature** means any signature affixed to a hard copy with a pen or other writing device. An electronic signature does not meet the requirements of a wet signature.