

COVID-19 Rent Relief CARES Coronavirus Relief Fund (CRF) September 12, 2020



Program Guidance

Contacts

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Homeless Services Section
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Federal and State updates are regularly received during the COVID-19 pandemic. Check with Homeless Services staff or submit questions directly to CVRRP.CARES@oregon.gov for Program Updates, revisions to Program Guidance policy and the latest state and or federal changes.

1. COVID Rent Relief Program Intent

The Oregon eBoard awarded Oregon Housing and Community Services \$52,250,000 in rental assistance for people who experienced a loss of income, compromised health conditions, at risk of losing their housing, or diagnosed or exposed to COVID-19, and/or displaced or unstably housed as the result of public health measures taken to reduce the spread of COVID-19. Oregon Housing and Community Services, in partnership with the CAPO network, is taking steps to ensure that people impacted by the coronavirus have access to resources delivered through Community Action Agencies across the State. COVID-19 Rent Relief and COVID-19 Rent Relief (CARES) Program funds will be disbursed using a formulaic method as defined in the Master Grant Agreement.

It is widely acknowledged that people experiencing poverty and other marginalized groups have historically borne the brunt of infectious disease epidemics and the lack of socially conscious government responses to them. According to Oregon Health Authority data, communities of color are disproportionately impacted by COVID-19. Using a robust and authentic approach rooted in a commitment to equity and racial justice, agencies are expected to administer culturally specific outreach to ensure communities of color are informed on the program and, if income eligible, are receiving access to these services.

2. Program Summary

CVRRP and CVRRP CARES CRF Program provides rental assistance for households who have experienced a loss of income related to COVID-19, been directly impacted by business closure related to COVID-19, have a compromised health condition, diagnosed or exposed to COVID-19, and/or displaced or unstably housed as a public health measure to reduce the spread of COVID-19.

Funds are provided through Oregon's Emergency Board Fund and the United States Treasury CARES Act, federal coronavirus relief fund, in response to the COVID-19 pandemic.

In order to qualify for assistance, households must meet:

- Income eligibility,
- Housing status requirements and
- Other CVRRP CARES CRF Program eligibility requirements

3. General Program Requirements

(A) Homeless Coordinated Entry Process

Subgrantees and subrecipients are required to actively participate in and promote the Continuum of Care (CoC) coordinated entry process for their service area

(B) Release of Information

Personally identifiable information is protected by federal laws (Privacy Act of 1974, as amended) and will be collected for the purpose of determining program eligibility, providing assistance/service, data collection, reporting and monitoring. Personally identifiable information will be shared with Oregon Housing and Community Services as is necessary to carry out the intent of an assistance or service program for the benefit of the person applying for such assistance or service and may be disclosed to Oregon Housing and Community Services without written authorization. Clients may also be asked to sign a Release of Information; however, refusal to sign such authorization cannot be the basis for denying program services to otherwise eligible clients. Client refusal to sign a Release of Information does not negate the inclusion of personally identifiable in secure reporting to Oregon Housing and Community Services. Oregon Housing and Community Services will de-identify client demographic data for the purposes of reporting. Subgrantees and their subrecipients must document in the client file that this privacy notification was provided to the client either verbally or in writing. For all other purposes of collecting personally identifiable information, subgrantees and their subrecipients must follow state and federal laws for the collection, use and sharing of client information.

(C) Confidentiality

Subgrantees and subrecipients must have policies and procedures that ensure all client information and records are secure and confidentially maintained. Subgrantee and subrecipient officers, employees and agents must be aware of and comply with the subgrantees' and subrecipients' confidentiality policies and procedures.

Confidential records includes all applications, records, files, and communications relating to applicants for, and clients of, CRF-funded services.

Electronic collection of client information requires procedures for ensuring confidentiality including:

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

Note to Domestic Violence Providers:

Subgrantees and subrecipients must have procedures that ensure the safety and security of program participants who are victims of domestic violence, including maintaining strict confidentiality of records.

The confidential policy standards maintained by subgrantees and subrecipients must comply with all applicable local, state and federal requirements. All records shall be open for review to federal, state, and subgrantees' auditors and/or examiners in the course of their regular audits and monitoring functions of CRF-funded programs.

(D) *Service Termination or Denial of Assistance*

Subgrantees and subrecipients must have written termination, denial, and grievance policies and procedures. The policies and procedures should be readily available to program participants either at intake or by posting the policy in a public place. It is important to effectively communicate these policies and procedures to applicants/clients and ensure they are fully understood.

Subgrantees and subrecipients are required to provide **written notice** to applicants/clients when denied program assistance or assistance is terminated. The notice must include the specific reason(s) for the denial/termination and identify the steps to appeal the subgrantee's and subrecipient's decision.

(E) *Grievance and Appeals Process*

Subgrantees and subrecipient are required to have an established, written process for addressing client grievances for decisions, including termination or reduction of benefit, denial of benefit or other grievance. At a minimum, the process must include the following components:

- Informs the participant/applicant of the policy and policy must be posted in general locations in which a client/applicant is expected to be;
- Informs the participant/applicant that they may contest any subgrantee's or subrecipient's decision that denies (for any reason) or limits eligibility of participant/applicant and/or terminates or modifies any benefits and identifies the steps to follow to contest the decision;
- Allows any aggrieved person a minimum of thirty days to request an administrative review;
- Informs the applicant/participant of their right to present written or oral objections before a person other than the person (or a subordinate of that person) who made or approved the decision;
- Informs OHCS of the request for administrative review within 10 days of receiving the request; and
- Informs the applicant/participant and OHCS in writing of the final determination and basis for the decision within ten days of the determination.

Any person or persons designated by subgrantee and subrecipient can complete the administrative review, other than the person who made or approved the decision under review or a subordinate of this person.

Subgrantees and subrecipients must make accommodations for clients who have language or disability barriers that would prevent them from participating in the appeals process.

OHCS retains the right to require modification of any review or appeals process that in its determination does not meet basic principles for notification, instruction, time allowance, impartiality, access and other necessary components.

(F) *Nondiscrimination*

Subgrantees and subrecipients are required to comply with all state and federal statutes relating to nondiscrimination. Subgrantees and subrecipients may not take any of the following actions based on race, color, national origin, religion, gender, familial status or disability (federal) or marital status, sexual orientation, gender identity or source of income (state):

- Refuse to accept an application for housing assistance or services
- Deny an application for housing assistance or services
- Set different terms, conditions or privileges for housing assistance or services
- Provide different or specific housing, facilities or services
- Falsely deny that housing is available for inspection or rental or that services are available
- Deny anyone access to a facility or service.

The Fair Housing Act prohibits discrimination based on protected classes in the housing activities of advertising, screening and unit rentals. Using a target population in screening is allowed; however, refusal to accept application or provide information on services or available housing to any protected class, even if these groups do not fit into your targeting strategy, is prohibited.

Screening criteria cannot be discriminatory and must be consistently applied. For example, a provider might decide to give priority to clients who graduate from a tenant readiness education program that is inclusive of all protected classes. If two applications come in at the same time and both meet the screening criteria, the applicant who also has the tenant readiness education experience could receive priority over the applicant who does not; however, providers should always accept the first applicant meeting their criteria or prioritization policy.

For more information, see the [Guide to Fair Housing for Nonprofit Housing and Shelter Providers](#) produced by the Fair Housing Council of Oregon, or contact them directly at www.fhco.org.

(G) *Limited English Proficiency*

The Federal government has issued a series of policy documents, guides and regulations describing how subgrantee and subrecipient should address the needs of citizens who have limited English proficiency (LEP). The abbreviated definition of persons with limited English proficiency is those who: have difficulty reading, writing, speaking, or understanding English, and do not use English as their primary language.

Subgrantee and subrecipients must have a LEP policy document that describes the actions subgrantee and subrecipient took to identify LEP populations in their service area and define actions they will take to provide language assistance and address language barriers. The policy must also state how and how often staff will receive training about assisting LEP persons, how the level of success of the policy will be identified and how changes will be made if needed.

Links to more information about Limited English Proficiency requirements are provided in the appendices “Applicable Rules and Regulations”.

Subgrantees and subrecipient should create a written Language Access Plan (LAP) to provide a framework to document how the agency’s programs will be accessible to all populations in their service area. Subgrantees and subrecipient who serve few persons needing LEP assistance may choose not to establish a LAP; however, the absence of a written LAP does not release subgrantee’s and subrecipient’s obligation to ensure LEP persons have access to programs or activities.

(H) Conflict of Interest

Subgrantee and subrecipient must keep records to show compliance with program conflict of interest requirements.

(1) Organizational

The provision of any type or amount of assistance may not be conditioned on an individual’s or household’s acceptance or occupancy of emergency shelter or housing owned by subgrantee, subrecipient or an affiliated organization. Conflict of interest waivers regarding rent assistance and rental agreement requirements can only be approved by OHCS. If a subgrantee or subrecipient wishes to apply for a waiver, they should contact the OHCS homeless program analyst or manager for guidance in submission of a waiver request, which must be approved by OHCS.

A subgrantee and subrecipient may conduct a participant’s intake assessment to determine program eligibility if the participant resides in housing where the subgrantee or subrecipient has ownership interest for the expediency of housing placement services and to create seamless service delivery while keeping the client engaged in services. A waiver of the conflict of interest policy for this purpose is not required for CRF-funded programs.

Subgrantees and subrecipients cannot steer potential renters to units owned or operated by the subgrantee or subrecipient, if the renters will be using a rent subsidy paid with any OHCS funds. Rent-subsidized tenants are free to enter into a rental contract with another landlord within the subgrantee or subrecipient’s jurisdiction or they may choose to rent a unit owned or operated by the subgrantee or subrecipient. A waiver request is not required for this situation; however, subgrantees and subrecipients must comply with this provision of the conflict of interest policy.

(2) Individual

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

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

(I) *Monitoring*

OHCS will conduct a program monitoring of subgrantees once every three years or more frequently at OHCS' discretion. Fiscal monitoring will be conducted annually unless circumstances require sooner. Subgrantees will be notified thirty (30) days in advance of the monitoring visit and informed of what documents and records will be reviewed and any required staff or Board interviews. OHCS will provide subgrantees with a written monitoring report inclusive of any findings, concerns or comments. Subgrantees are required to submit timely corrective action to findings and failure to do so may result in the withholding and/or return of CRF funds to OHCS.

Subgrantees must notify and receive approval from OHCS when adding subrecipients and/or renewing subrecipients. Notification and approval normally occurs during the Master Grant Agreement funding application process. However, if changes are made outside of the funding application, subgrantees must submit an Implementation Report Amendment Request form.

(J) *Subrecipient Monitoring*

Subgrantees must monitor their subrecipient organizations at least once during a biennium or the term of the Master Grant Agreement, as determined by OHCS. Subrecipient organization monitoring procedures must be in place and adequately ensure compliance with CRF program requirements. Monitoring reports will be retained by the subgrantee and available for review by OHCS or other authorized entity.

All subrecipients must comply with all program rules and regulations as noted in this program guidance, the Master Grant Agreement and Program Element: Scope of Work.

4. Applicant Eligibility

Program	COVID Eligibility	Housing Status Eligibility	Income Eligibility	Eligible Program Components
CVRRP	<ul style="list-style-type: none"> • Loss of income due to COVID-19 related factors • Compromised health status • Elevated risk of infection or vulnerability due to COVID-19 factors 	<ul style="list-style-type: none"> • Unstably housed • Literally homeless • Imminent risk of homelessness • Fleeing Domestic Violence • Homeless under other federal statutes 	<ul style="list-style-type: none"> • At or below 50% AMI 	<ul style="list-style-type: none"> • Homeless Prevention • Rapid Re-Housing
CVRRP CARES CRF	<ul style="list-style-type: none"> • Loss of income due to COVID-19 related factors • Compromised health status • Elevated risk of infection or vulnerability due to COVID-19 factors 	<ul style="list-style-type: none"> • Unstably housed • Literally homeless • Imminent risk of homelessness • Fleeing Domestic Violence • Homeless under other federal statutes 	<ul style="list-style-type: none"> • At or below 80% AMI 	<ul style="list-style-type: none"> • Homeless Prevention • Rapid Re-Housing

(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.

(B) **Housing Status**

Homeless households are eligible to receive CRF-funded services; and unstably housed households can receive CRF services. Eligible applicants for program services must meet one of the following categorical definitions of homeless or unstably housed and at risk of homelessness:

Category 1: Literally Homeless—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 human habitation (including, but not exclusive to, a car, park, abandoned building, bus or train station, airport or camping ground);
- Living in a publicly or privately operated shelter designated to provide temporary living arrangements (including congregate shelters, transitional shelter, and hotels or motels paid for by charitable organizations or by federal, state or local government programs);

OR

- Exiting an institution where he or she has 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 Homelessness—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;
- 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: Homeless Under Other Federal Statutes—Unaccompanied youth under 25 years of age, or families with children and youth, who do not otherwise qualify as homeless under this definition, (literally homeless, imminent risk of homelessness or fleeing/attempting to flee domestic violence) but who:

- Are defined as homeless under other listed federal statutes;
- Have not had a lease, ownership interest, or occupancy agreement in permanent housing during the 60 days prior to the program assistance application;
- Have experienced persistent instability as measured by two moves or more during the preceding 60 days; **AND**
- Can be expected to continue in such status for an extended period of time due to special needs or barriers.

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

- Is fleeing, or is attempting to flee, domestic violence;
- Has no other safe residence; **AND**
- Lacks the resources or support networks to obtain other permanent housing.

Category 5: Unstably Housed—Individual or family who:

CVRRP CARES CRF
<ul style="list-style-type: none">• Is at risk of losing their housing, and does not otherwise qualify as homeless 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; AND• Lack the resources or support networks to obtain other permanent housing. <p>*High risk may be demonstrated by, but is not solely defined as: having experienced a loss of income or other threat to housing stability due to the COVID-19 crisis (For instance, a roommate or household member that was contributing to the rent is no longer able to pay their portion of the rent due to COVID), or displaced as a result of public health</p>

measures taken to reduce the spread of COVID19, and it is unknown if the problem will be resolved in time to avert a loss of housing.

(C) Income

- (1) CVRRP – 50% AMI (\$8.5 Million allocation):
CVRRP funding from the \$8.5 Million allocation is to be used for people needing assistance during the pandemic earning up to 50% Area Median Income (AMI).
- (2) CVRRP CARES CRF – 80% AMI (\$52 Million allocation):
CVRRP CARES CRF funding from the \$52 Million allocation is to be used for people needing assistance during the pandemic earning up to 80% Area Median Income (AMI).

Although both funding sources are under federal guidance the income criteria remains at the initial AMI.

Additional supplemental employment income (\$600) issued during the COVID-19 pandemic is excluded for the purpose of income eligibility requirements.

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. While household assets should be identified to determine that a program applicant lacks the resources to obtain or retain permanent housing, they are generally not counted as income. There are other exceptions to income based on federal guidance, so please reach out to OHCS for additional clarification on what is counted toward income.

Subgrantee’s process for determining income eligibility and the documentation required should be consistent and must be applied equally across services that use or is supported by CVRRP or CVRRP CARES CRF funding. Subgrantees’ policies and procedures must identify what method they will use to determine income eligibility and exceptions to the policy, if any. Documentation methods may include:

- Previous 12 months of income;
- “Snapshot” of current income (at time of assessment);
- Previous 30 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.

(D) Program Specific Eligibility Criteria

CVRRP and CVRRP CARES CRF services require applicants to meet one of the program specific eligibility criteria to qualify for the programs:

- (1) Loss of employment or income due to COVID-19 related factors; **OR**
- (2) Directly impacted by business closure related to COVID-19; **OR**
- (3) Diagnosed or exposed to COVID-19; **OR**
- (4) Compromised health status or elevated risk of infection or vulnerability to health as related to COVID-19.

(E) Citizenship

CVRRP and CVRRP CARES CRF Funds are permitted to be utilized for individuals who are non-citizens, including undocumented individuals. Additional rationale for this allowance is listed below:

Federal law passed in the 90's (welfare reform act) generally prohibits "an alien who is not a qualified alien" from receiving any "Federal public benefit." Federal public benefit" to include "any retirement, welfare, health, disability, public or assisted housing, postsecondary education, food assistance, unemployment benefit, or any other similar benefit for which payments or assistance are provided to an individual, household, or family eligibility unit by an agency of the United States or by appropriated funds of the United States." 8 USC 1611(c)(1)(B).

There are exceptions to this prohibition, including for "short-term, non-cash, in-kind emergency disaster relief" as well as "public health assistance...for testing and treatment of symptoms of communicable diseases whether or not such symptoms are caused by a communicable disease." As "appropriated funds of the United States," the Coronavirus Relief Fund created by the CARES Act appears to be subject to this prohibition. To the extent that 8 USC 1611 applies to funds distributed under the CARES Act, it appears that CRF Rental Assistance would be excepted from the prohibition given the emergent crisis.

(F) Eligibility Documentation

COVID-19 related eligibility may be documented through Self Certification and/or within guidelines for Remote Application and Documentation.

Self-Certification may include, but is not limited to:

- Declaration that a household member's health is at risk due to COVID-19 related factors,
- Employment or income has been lost due to COVID19 related factors,
- A household member has been directly impacted by a business closure related to COVID-19,
- A household member has been diagnosed with COVID19,
- Overcrowding has occurred in the household's current living situation and they have been requested to move due to COVID-19 social distancing guidelines.

Applicants who apply for assistance and provide eligibility documentation remotely may do so via electronic and other communication; e.g., phone, email, text, electronic messaging, mail and other electronic or remote means. The documentation must be kept in the client file.

Subgrantees and subrecipients are required to develop and maintain policies and procedures for the use of a remote application and eligibility documentation process and be available for review by OHCS, upon request. Such policies and procedures must be applied equally across services that use or are supported by CVRRP and CVRRP CARES CRF funding.

These policies and procedures must address the following elements:

- In what circumstances a remote application and documentation process will be used;
- Verification of the identity of the applicant;
- Verification and documentation of qualification for assistance in relation to program eligibility criteria;
- Verification and documentation as appropriate for ongoing demonstration of eligibility; and
- Notification and documentation to client in relation to release of information, service denial or termination and grievance and appeal requirements.

5. Allowable Program Components and Expenditures

COVID-19 Rental Relief Program funds are intended as a one-time allocation to assist people impacted by loss of income, compromised health conditions and are at risk of losing their housing due to COVID-19.

CVRRP incurred related expenses are eligible for the period that begins March 1, 2020 and ends January 31, 2021. Rent payments incurred before 03/01/20 cannot be paid with CVRRP CARES funds. All request for funds should be submitted by the subgrantee to OHCS no later than 12/30/20.

Program expenditures must be supported by documentation that demonstrates how the expenditure aligns with the allowable Rental Assistance component and helps the client to attain or maintain safe shelter. CVRRP and CVRRP CARES CRF Rental Assistance is unique and charges

are under the OPUS Category of Homeless Prevention/ Rental Assistance (HP-RA) for COV RENT RELIEF or HP/RRH RA when using COVID RR CARES.

Note on Utility Payments: Utility payments were allowed under prior versions of this guidance document. Utility payments directly to utility companies are no longer allowed after 8/19/20. OHCS will honor past guidance on this allowance to ensure clients served under past iterations of this program will be supported with these payments.

OHCS allows flexibility if you approved payments prior to 8/19/20, but processing the payment occurred after this date.

Utility payments to landlords, when utility payments are included as part of the rent or when a landlord charges a fee or a bill back to the tenant, are allowed retroactive to the beginning of the grant. If utility payment is payable to the land lord, rather than the utility company, it continues to be an allowable expense. Utility payments are inclusive of gas, water, garbage and electricity.

(A) CVRRP Conversion to CVRRP CARES

CVRRP (50% AMI - \$8.5 Million) program will have a new grant period to align with the federal CRF Guidance. The new dates are 03/01/20 to 12/30/20. If you have already paid for expenses before or after these dates, OHCS can work with you to grant exceptions to these unique situations.

(B) CVRRP CARES 50% AMI Homelessness Prevention Rental Assistance

Eligible **Homelessness Prevention Rental Assistance and Rapid Re-Housing Rental Assistance** services are included in the OPUS category COV RENT RELIEF HP-RA, but are not exclusive to:

- (a) Rent payments
- (b) Late fees and arrearages (one-time payment of arrears may be paid for past due rent incurred back to 3/1/2020)
- (c) Manufactured home rental space “lot rents” or RV space for primary housing;
- (d) Moving and storage costs;
- (e) Security deposits and application fees;
- (f) Hotel/Motel vouchers.

CVRRP 50% AMI (\$8.5 Million allocation) cannot be used for client services, case management, or housing navigation expenses.

NOTE: CVRRP CARES CRF (80% AMI - \$52 Million allocation) funds can be used for Admin-No Indirect and Program costs. Under OPUS, CVRRP 80% is identified as COV RR CARES and allowable expenditures include Admin-No Indirect and HP/RRH RA. Admin-No Indirect includes Direct Admin, Fiscal reporting, Auditing, Procurement, Planning HR, Case Management, Intake, Date Entry, Outreach, Application/forms and Communication. HH/RRH RA includes Homeless Prevention/Rapid Rehousing Rent Assistance.

6. Financial Management

(A) **Administration**

CVRRP – 50% AMI (\$8.5 Million) converted to CVRRP CARES funding September 2020. It does not have any administrative funds attached to the funding allocation and the eligible income limit remains at 50% AMI. Since the CVRRP 50% AMI program did not include any allocated Administrative resources, prior OHCS guidance indicated CAAs use of state resources such as EHA to operate the program. We would like to clarify what available fund sources you can use for this program:

- EHA – can pay indirect and direct Admin costs for CVRRP (50% AMI - \$8.5 Million allocation)
- CSBG – Can only pay directly allocable (direct admin) costs for CVRRP (50% AMI - \$8.5 Million allocation)
- CVRRP CARES CRF (80% AMI - \$55 Million allocation) – can pay Direct Admin for CVRRP CARES (50% AMI - \$8.5 Million) only. CVRRP CARES Admin includes more than direct admin costs as provided below.

Both “Admin” and “Program Delivery” activities are captured under CVRRP RR CARES “Admin-No Indirect” in OPUS; allowed activities are listed below.

- Admin-No Indirect **and** Program Delivery:
 - Fiscal reporting
 - Auditing
 - Procurement
 - Planning HR
 - Case Management
 - Intake
 - Data Entry
 - Outreach
 - Application/forms and communication

(B) **Use of OPUS**

The OPUS System is a web-based centralized data system designed to meet business-processing needs. Subgrantee staff must complete training before being authorized to use the fiscal operations program of OPUS. Training can be provided by the Fiscal Grant Specialist at OHCS.

OHCS maintains an OPUS Manual and OPUS Help Desk. Staff can be reached at:

Email: opushelp@oregon.gov

Ph: (503) 986-2099

Toll Free: (800) 453-5511 Option 6

(C) Request for Funding Documentation

Subgrantees must retain supporting documentation of all costs charged to the applicable grant and be able to provide evidence that grant funds were spent on allowable costs. When subgrantee submits a Request for Funds (RFF) on OPUS, they are required to download documentation of the costs for which they are requesting payment. Any RFF submitted without accompanying documentation or with insufficient documentation will be returned to the subgrantee with instructions to provide additional information.

(D) Budget Change Requests and Implementation Report Amendments

Changes in a subgrantee's scope of work may necessitate the submission of a budget change request. All budget changes require OHCS approval by submitting a Budget Change Request form electronically to: mga.fiscal@oregon.gov.

At the discretion of OHCS, additional information or an Implementation Report Amendment Request form may be required for a budget change request.

Implementation Report Amendments are required when there is a shift in program delivery and/or scope of work. All Implementation Report Amendments require OHCS approval by submitting an Implementation Report Amendment Request through the appropriate Smartsheet form:

Subgrantees must notify, within 30 days, and receive approval from OHCS when adding subrecipients. Notification and approval normally occurs during the Master Grant Agreement funding application process; however, if changes are made outside of the funding application, subgrantees must notify OHCS and obtain approval by submitting an Implementation Report Amendment Request through the appropriate Smartsheet form.

(E) Funds Spend Down

Time Bound Expenditure Plans (TBEP) are required to be submitted. We know the increased spending rate will be challenging from a capacity perspective; however, CVRRP CARES and CVRRP CARES CRF funds are required to adhere to all fiscal related Spend Down policies.

Subgrantees submit spenddown target to OHCS within the timeline specified by OHCS and in form and format approved by OHCS. OHCS will review subgrantee's grant spending in accordance with subgrantee's Master Grant Agreement and OHCS policy and will review expenditures for CRF-funded program twice per month.

Subgrantees must submit request for funds (RFF) on a monthly basis, at a minimum.

Subgrantees are expected to fully obligate or expend grant funds during each funding cycle in accordance with OHCS policy. Contact your OHCS Program Analyst for any questions regarding your expenditure of funds.

7. Data Requirements

(A) **Key Performance Measures**

The key performance measures of six month follow-up and exit to permanent housing are not required for CVRRP CARES and CVRRP-CARES CRF funding although for HMIS data collection, the “DESTINATION” field is required.

(B) **Data Entry**

Subgrantees and their subrecipients are required to enter CRF-related client and service data into the Service Point Homeless Management Information System (HMIS), except for data of victims of domestic violence clients, which must be entered into a comparable database that meets HMIS standards. Projects serving survivors of domestic violence where the operator is not a victim services provider are required to enter data in their HMIS. Subgrantees and subrecipients are responsible for acquiring and documenting informed written consent from program participants, and protecting program participant’s confidentiality.

Additional guides and assistance with HMIS data entry, data quality and reporting may be found on our website at: <https://www.oregon.gov/ohcs/for-providers/Pages/index.aspx>.

(C) **Data Timeliness**

Timely and accurate data entry is critical to ensuring meaningful data analysis and reporting. Therefore, it is recommended that subgrantees and subrecipients enter data within three business days.

(D) **Required Data Elements**

HMIS Universal and OHCS-required Data Elements that must be collected for ALL programs include, but are not limited to:

1. Name
2. Social Security Number
3. Date of Birth
4. Race/Race Additional
5. Ethnicity
6. Gender
7. Veteran Status
8. Disabling Condition
9. Current Living Situation
10. Prior Living Situation
11. Project Start Date
12. Project Exit Date
13. Destination
14. Relationship to Head of Household
15. Client Location
16. Current County of Residence (for CAAs that cover more than one county)
17. Domestic Violence Victim/Survivor

Additional Elements collected on Rapid Re-Housing and Homelessness Prevention

18. Income and Sources
19. Non-Cash Benefits
20. Health Insurance
21. Disability Type
22. Percent of AMI
23. Housing Move-In Date
24. Direct Service Costs (monthly rent payment)

(E) Comparable Database

Victim service providers are prohibited from entering data in HMIS; however, they are required to maintain comparable databases which provide aggregate information and data consistent with HMIS data collection requirements.

Comparable Databases must have the following characteristics:

- The victim service provider controls who can access and see client information;
- Access to the database is carefully controlled by the victim service provider;
- Meets the standards for security, data quality, and privacy of the HMIS within the Continuum of Care. The Comparable Database may use more stringent standards than the Continuum of Care's HMIS;
- Complies with all HUD-required technical specifications and data fields listed in HMIS;
- Be programmed to collect data with the most up-to-date HMIS Data Standards;
- Have the functionality necessary to de-duplicate client records within each system in order to provide an aggregate and unduplicated count of clients by project type;
- Be able to generate all reports required by federal and state partners, for example, the HUD-CoC APR, HUD-ESG CAPER and the OHCS Participant Demographic Report; and
- Data fields that can be modified and customized by the victim service provider to benefit clients.

Additionally, individual survivor data must be routinely destroyed as soon as the program no longer needs it to provide client services or to satisfy grant/legal requirements. Victim service providers may suppress aggregate data on specific client characteristics if the characteristics would be personally identifying. Finally, the program's contract with the database vendor should include binding agreements to ensure security of and program control over client data.

8. Records Requirements

(A) Case Files

Documentation of client eligibility and services received must be maintained in client case files (paper or electronically) and include a copy of the coordinated entry assessment to

confirm participation in coordinated entry. Documentation for applicants found to be ineligible for assistance or for clients who are no longer eligible to receive assistance is required and will include the client's request for assistance, why they are ineligible and how it was communicated to the applicant. Ineligible clients do not need to be entered into HMIS unless the use of HMIS is a part of the subgrantee or subrecipient's intake/assessment process.

File documentation will be the basis of OHCS monitoring to ensure subgrantee and subrecipient is in compliance with program requirements and regulations. OHCS recommends that subgrantees and subrecipients use a client file checklist to ensure adequate documentation of case files. Sample forms are available on the OHCS website.

(B) *Records Access*

Subgrantees and their subrecipient organizations are required to permit OHCS, the Oregon Secretary of State's Office, the federal government, and the duly authorized representatives of such entities access to, and the right to copy, all program client and fiscal records for such purposes as research, data collection, evaluations, monitoring, and auditing. At the sole discretion of OHCS, access to records shall include the removing of records from the subgrantees' and subrecipients' office.

(C) *Records Retention*

Subgrantees and subrecipients shall retain all program records pertinent to client services and expenditures incurred under CRF-funded programs in a manner consistent with the requirements of state and federal law. This includes, but is not limited to, those requirements listed in Administrative Rule, Operations Manual and Special Schedules. Find the OHCS Special Schedule at the Oregon State Archives:

[\(\[https://sos.oregon.gov/archives/Pages/state_admin_schedules.aspx\]\(https://sos.oregon.gov/archives/Pages/state_admin_schedules.aspx\)\)](https://sos.oregon.gov/archives/Pages/state_admin_schedules.aspx).

Find the State Agency General Records Retention Schedules at the Oregon State Archives:

[\(\[https://sos.oregon.gov/archives/Pages/records_retention_schedule.aspx\]\(https://sos.oregon.gov/archives/Pages/records_retention_schedule.aspx\)\)](https://sos.oregon.gov/archives/Pages/records_retention_schedule.aspx).

Subgrantees and subrecipients shall retain and keep accessible all such **fiscal and program records**, client records, digital and electronic records, books, documents, papers, plans, and writings for a minimum of **(6) six years**, or such longer period as may be required by applicable law, whichever date is later. Applicable law includes the following final payment and termination of CRF funding, or until the conclusion of any audit, controversy or litigation arising out of, or relating to CRF-funded programs.

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