Emergency Housing Assistance (EHA)
State Homeless Assistance (SHAP)
COVID-19 Rent Relief Program (CVRRP)
June 3, 2020

State Homeless Funds Program Operations Manual

Contacts

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1. Program Summary

Emergency Housing Assistance (EHA) provides state funds to supplement effective existing local programs and/or establish new programs designed to prevent and reduce homelessness. EHA funds are available for the following program components: street outreach, emergency and transitional shelter; transitional housing; homelessness prevention; supportive in-home services; rapid re-housing; data collection; shelter or transitional housing acquisition, rehabilitation or conversion; and community capacity building designed to enhance, expand or sustain homeless services. EHA can serve households that are homeless or unstably housed with an income that is at or below 80% area median income. *[ORS 458.650]*

The **State Homeless Assistance Program** (SHAP) provides operational support for emergency shelters and related client supportive services for homeless individuals, families and households. SHAP funds are available for the following program components: street outreach, emergency and transitional shelter; data collection; and shelter acquisition, rehabilitation or conversion. There is no income eligibility requirement for SHAP-funded assistance.

The **COVID-19 Rent Relief Program (CVRRP)** provides funds for rent assistance to individuals and families who experienced a loss of income related to COVID-19, been directly impacted by business closure related to COVIID-19, diagnosed or exposed to COVID-19, and/or displaced or unstably housed as a result of public health measures taken to reduce the spread of COVID-19. Households must meet income eligibility, housing status requirements and at least one of the COVID-19 Rent Relief program specific eligibility requirements.

EHA program funding comes from legislatively approved state general funds and the Document Recording Fee (DRF). EHA funds, including DRF, are allocated annually, effective with the 2019-2021 Master Grant Agreement. The DRF funding for Veterans requires separate tracking and reporting of Veteran clients and expenditures. *[ORS 458.650]*

SHAP program funding comes from legislatively approved state general funds allocated on a biennial basis.

CVRRP program funding comes from Oregon's Emergency Fund and are provided in response to the COVID-19 pandemic.

2. Administrative Requirements

(A) *MGA Operational Standards*

MGA Operational Standards are not applicable to CVRRP.

Master Grant Agreement (MGA) Operational Standards are specific identified criteria used to set a foundation of administrative, fiscal and service delivery expectations for community action agencies. The purpose of the standards are to ensure that no matter where individuals and families enter the homeless system, Oregonians will be provided the same access to quality services.

Five service delivery components have been included in the MGA Operational Standards. They are:

(1) The use of Housing First;
The Housing First Model encourages clients to create and implement their own goals while immediately housing or sheltering clients with no preconditions (except complying with a shelter code of conduct or standard lease agreement). Research has shown that Housing First programs increase housing stability for clients serve, are cost effective compared to traditional services that impose sobriety perquisites to shelter or housing and increase client utilization of other services. More information can be found at: https://endhomelessness.org/resource/housing-first or at https://www.usich.gov/solutions/housing/housing-first/.

(2) Maximizing participation in Coordinated Entry;
Coordinated entry is a process developed to ensure that all people experiencing a housing crisis have a single or coordinated point of entry and equal access to the homeless delivery system. This type of entry allows homeless persons and those at-risk of homelessness to be quickly identified, assessed, referred and connected to the appropriate shelter or housing, and assistance. It also facilitates the assessing agency's ability to prioritize the most vulnerable individuals and households for immediate assistance. More information can be found in the Homeless Coordinated Entry Process section of this manual and at https://www.hudexchange.info/resources/documents/Coordinated-Entry-Policy-Brief.pdf.

(3) Ensuring availability of low-barrier shelters in the community;
Low and no barrier policies allow homeless individuals and households to access shelter, housing and services without preconditions such as sobriety, compliance with treatment plan, no pets, or agreement to participate in specific programs, activities or classes. These policies allow the most in need to have access to shelter and housing. More information can be found at https://www.usich.gov/resources/uploads/asset_library/emergency-shelter-key-considerations.pdf.

(4) Incorporating the lived experiences of homelessness into program design and implementation; and
Incorporating the lived experience of homelessness into program design and implementation is a commitment and framework to include everyone, especially people with lived experience, in planning, implementation and evaluation. The Lived Experience Advisory Council in Canada developed seven principles for ensuring equitable participation for people with lived experiences that can further inform inclusion strategies. More information can be found at the Persons with Lived Experience Feedback section of this manual and at https://www.usich.gov/news/people-with-lived-experience-must-be-meaningful-partners-in-ending-homelessness/ and https://homelesshub.ca/sites/default/files/LEAC-7principles-final.pdf.

(5) Ensuring service provision has components for equity and racial justice.

(6) OHCS is committed to advancing equity and racial justice in alignment with the Statewide Housing Plan and informed by national promising practices and lived experience of communities of color. OHCS and Community Action Agencies commit to an intentional, data-driven approach to reduce disparities in housing and social service provision. Use of the EPIC Outcomes Tool to establish and measure equity and racial justice performance goals will help CAAs to analyze their progress in meeting these goals. More information can be found at the Performance Measure Requirements section of this manual and at https://www.centerforsocialinclusion.org/our-work/our-four-strategies/, http://center4si.com/sparc/, and https://www.usich.gov/news/racial-equity-an-essential-component-of-our-nations-homelessness-response/.

(B) *System Wide Performance Requirements*

The Oregon Legislative Fiscal office adopted a set of criteria that agencies must meet when developing key performance measures. In alignment with the federal and state strategic plans to end homelessness, OHCS has established two performance measures:

- Increased housing stability as measured by the percentage of total program participants served who reside in permanent housing at time of exit from program; **and**
- Increased housing stability as measured by the percentage of program participants who at program exit reside in permanent housing and maintain permanent housing for six months from time of exit.

EPIC Outcomes Measures are not applicable to CVRRP.

In addition to the current two required measures listed above, subgrantees will have the opportunity to choose additional performance measures from four categories – **E**nding Homelessness, **P**reventing Homelessness, **I**nclusion and Diversity, and **C**apacity of the Community (EPIC), as referenced in the Master Grant Agreement. The EPIC Outcomes Tool is a table listing a selection of performance measures and outcomes under each of the four headings.

All performance measures use HMIS as their primary data source, unless otherwise noted.

These outcome measurements will be in addition to reporting of required universal data elements that track client characteristic and service data.

Reporting of the performance measures are required in the year-end report and is client household-based, not funding source. Assistance with HMIS data entry and reporting may be found on our website at: http://www.oregon.gov/ohcs/Pages/housing-assistance-providers-in-oregon.aspx.

Locating and following up with clients can be challenging. Strategies that have shown the best results include the following:

✓ Follow-up is provided by the case manager or staff whom the client knows and has worked with;

- ✓ Informing the client at time of intake/assessment of the need and value of follow-up and requesting their permission to contact them and/or other identified contacts after they exit the program;
- ✓ Securing multiple points of contact for the client prior to their exit such as a friend, family member, employer, landlord or someone who the client is likely to stay in touch with during the six month period;
- ✓ Utilizing the subgrantee's LIHEAP or OEAP list of clients to verify permanent housing since LIHEAP and OEAP can only be delivered to those residing in permanent housing; and
- ✓ Development of MOUs with other agencies such as DHS, Housing Authorities, CDCs, etc. to determine the housing status of clients.

Regardless of the method of follow-up utilized, subgrantees must obtain client permission through a signed release of information to contact others.

(C) *Training*

Training is not applicable to CVRRP.

Subgrantee and subrecipient staff that provide direct services and supervise staff who provide direct services and manage homeless grants must receive training and demonstrate competency, as documented through the CSBG Organization Standards #5.8 (Board) and #7.9(Staff). Training is an eligible expense of case management and may include:

- Trauma Informed Services
- Mental Health First Aid
- Harm Reduction
- Supporting Victims of Domestic Violence
- Local Coordinated Entry Policies and Procedures
- Fair Housing
- Best Practices in Serving Homeless and Chronically Homeless Families and Individuals

(D) *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

(E) *Persons with Lived Experience Feedback*

Persons with Lived Experience Feedback is not applicable to CVRRP.

Subgrantees and subrecipients must develop a systematic approach for collecting, analyzing and reporting client satisfaction data. A person with lived experience feedback system must document the steps the subgrantee and subrecipient will use to review feedback and will include how the persons with lived experience feedback is used or not used. Feedback may be through surveys, participation on advisory boards and other formats and may be received by the subgrantee or subrecipient in person, on paper, by posting through a website or by email or other electronic means.

3. General Program Requirements

(A) *Release of Information*

Client information (including identifying the person as a client) should not be released without written authorization from the client. Subgrantees and subrecipients are required to have a signed agency Release of Information form for each adult member of the identified household authorizing the release of information pertinent to determining program eligibility, providing assistance/service, HMIS reporting and other relevant need for sharing information. Each adult member must complete and sign their own ROI privately and ROIs cannot be shared with other household members. Unaccompanied youth who are the head of household must also have a signed Release of Information form on file. Release forms must be time-limited and specific as to with whom and what information will be shared.

OHCS is required to be listed as an entity with which client information will be shared as it pertains to data collection and monitoring (including third-party audits and reviews).

Client refusal to sign a Release of Information must be documented, dated and kept in the client file. Client refusal to sign such authorization **cannot** be the basis for denying program services to otherwise eligible clients.

(B) *Client Service or Housing Plan*

[ORS 458.528]
Client Service or Housing Plan is not applicable to CVRRP

Development of a client service or housing plan is required for those clients receiving more than one-time only services. Plans are required to be client driven, using input and goal setting by the client. Warming shelters are excluded from this requirement. Existing and active service/housing plans with other providers may be used and amended for state-funded services.

(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, EHA SHAP 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 the EHA and SHAP 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. Additionally, the address and location of EHA and SHAP funded domestic violence shelter facilities must be protected from public disclosure except as authorized by the director of the organization responsible for operations of the shelter.

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 EHA and SHAP-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 by 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 EHA/CVRRP/SHAP.

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*

[OAR 813.046. 049, 240]

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 EHA, CVRRP and SHAP 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 a Implementation Report Amendment Request form.

(J) *Subrecipient Monitoring*

[OAR 813.046, 049, 240]

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 EHA, CVRRP and SHAP 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 manual, the Master Grant Agreement and Program Element: Scope of Work.

4. Applicant Eligibility

Applicant Eligibility	Emergency Housing Assistance (EHA)	State Homeless Assistance Program (SHAP)	COVID-19 Rent Relief Program (CVRRP)

Homeless Status	• literally homeless
	• imminent risk
	• other federal statutes
	• fleeing DV
	• unstably housed
		• literally homeless
		• other federal statutes
		• fleeing DV
			• literally homeless
			• imminent risk
			• other federal statutes
			• fleeing DV
			• unstably housed
			  ○ loss of income
			  ○ health impacts

Income Requirement	80% or below area median income	no income requirements	50% or below area median income
Program Specific Requirements	N/A	N/A	• loss of income due to COVID-19-related factors • compromised health status or elevated risk of infection or vulnerability due to COVID-19-related factors

(A) *Household Composition*

[ORS 458.650, OAR 813.046, 049, 240]

"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) *Legislatively Targeted Populations for EHA*

[ORS 458.650, OAR 813.046]

Legislatively targeted populations for **EHA** include veterans, seniors over 65 years of age, persons with disabilities, farmworkers, and Native Americans.

(C) *Housing Status*

[ORS 458.528, 458.650]

Homeless households are eligible to receive **EHA, CVRRP** and **SHAP** funded services; and unstably housed households can receive **EHA and CVRRP** 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:

EHA
• 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.
CVRRP

- 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.

  **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, or displaced as a result of public health measures taken to reduce the spread of COVID-19, and it is unknown if the problem will resolve in time to avert a loss of housing.*

(D) *Income*

[OAR 813.046, 049]

There is no income eligibility requirement for **SHAP** funded assistance.

EHA-provided services require applicants to be low income; i.e., gross household income at or below 80% of area median income.

CVRRP provided services require applicants to be very-low income; i.e., gross household income at or below 50% of area median income. Additional supplemental employment income ($600) issued during the COVID-19 pandemic are excluded for the purpose of income eligibility requirements.

Income includes the current gross income of all adult household members at the time of assessment. 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. Documentation of income for 30 days prior to the assessment must be kept in the applicant file. If income statements are not available for 30 days prior to the assessment, applicant must self-certify the 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.

(E) *Program Specific Eligibility Criteria*

CVRRP-provided services require applicants to meet **one** of the program specific eligibility criteria to qualify for this program.

(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.

(F) *Veteran Status*

[ORS 408.225; OAR 813.046]

Eligible applicants for **EHA DRF** veterans funding (EHA DRF VET) 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.

(G) *Citizenship and Residency*

There is no client citizenship or residency requirement to be eligible for EHA, CVRRP-and SHAP- funded assistance.

(H) *Eligibility Documentation*

[OAR 813.046, 049, 240 – also see Records Section of this Manual]

(1) Documentation of all client/applicant eligibility information must be available in client/applicant files or if kept electronically, available upon request in the format requested. Documentation of all efforts to obtain higher preference of verification (3rd party and Intake Worker Observation) when lower forms of preference are used, must be in writing and kept in the client/applicant file.

(2) **Remote Application and Documentation**

The standard preference is for applicants to apply for assistance in person or to have in-person contact with the subgrantee or subrecipient throughout the application and service delivery process. A remote application and documentation process may be used when necessitated.

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 available for review by OHCS, upon request. Such policies and procedures must be applied equally across services that use or are supported by EHA, CVRRP or SHAP funding.

These policies and procedures must address the following elements:

a) In what circumstances a remote application and documentation process will be used;

b) Verification of the identity of the applicant;

c) Verification and documentation of qualification for assistance in relation to program eligibility criteria;

d) Verification and documentation as appropriate for ongoing demonstration of eligibility;

e) Notification and documentation to client in relation to release of information, service denial or termination and grievance and appeal requirements.

(3) **Order of Preference**

OHCS requires program staff to comply with the following general documentation standards listed in order of preference:

- **Third-party documentation**, where it is available, is the preferable form of documentation. Third party documentation includes verification from an employer, landlord, public benefit worker, agency service provider, etc. Written verification sent directly to program staff or via the applicant is preferred.

- **Intake Worker Observation** may include oral statements made by a social worker, case manager, or other appropriate official at an institution, shelter, or other facility and documented by the Intake Worker. When the Intake Worker is unable to obtain a written or oral statement from a shelter, institution or facility staff, the Intake Worker must document, in writing, their efforts to obtain eligibility documentation and must place their documentation in the client's file.

- **Applicant Self-Certification** requires a written and signed document by the individual or head of household seeking assistance attesting to the facts for which they are certifying. A third-party may be designated by an applicant to sign documents on their behalf when they are unable to do so. It is the responsibility of the subgrantee and subrecipient to provide access to language interpretation

services and assistive devices necessary for applicants to understand the documents they are certifying.

(4) **Simplified Documentation Option**

When a subgrantee or subrecipient moves an active client from the Housing Stabilization Program (HSP) to EHA, SHAP or Elderly Rental Assistance (ERA) programs or between state funds (EHA, SHAP, ERA), they may choose to use a simplified documentation process for the client's homeless status and income; whereby the subgrantee or subrecipient case manager verifies that the client meets the homeless status and income of the funding source at the time of entry and that the client is eligible for the funding source to which they are moving, without requiring additional documentation. Documentation from the original source of funding must be readily accessible for monitoring purposes. To use the Simplified Documentation Option, there can be no lapse in service from one program to the other.

Subgrantee and subrecipient may use the sample form provided on the OHCS website to document the client file using this simplified documentation option.

Emergency Solution Grant (ESG) funds still require separate documentation and are not subject to a simplified documentation option.

(5) **CVRRP Specific Eligibility Documentation Guidance**

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 COVID-19 related factors, a household member has been directly impacted by a business closure related to COVID-19, a household member has been diagnosed with COVID-19, overcrowding has occurred in the household's current living situation and they have been requested to move due to COVID-19 social distancing guidelines.

5. Allowable Program Components and Expenditures

[ORS 458.650]

Documentation of allowable program components and expenditures must identify how an expense or service helped a client maintain or attain permanent housing.

EHA (inclusive of EHA Document Recording Fee (DRF) and EHA DRF VET), and **SHAP HF** can be used in **one or more** of the following eight program components:

(A) Street Outreach

(B) Emergency & Transitional Shelter

a. Shelter and Facility Operations (inclusive of motel/hotel vouchers)

b. Shelter Resident Support Services

(C) Transitional Housing

(D) Homelessness Prevention & Rapid Re-Housing

(E) Supportive In-Home Services

(F) Shelter or Transitional Housing Facilities Acquisition. Rehab/Conversion

(G) Community Capacity Building

(H) Data Collection

CVRRP can be used in either of the following two program components:

(A) Homelessness Prevention Rental Assistance

(B) Rapid Re-Housing Rental Assistance

(A) *Street Outreach*

EHA (and DRF/DRF VET) and **SHAP** funding can pay for street outreach services for the specific purpose of reaching out to unsheltered homeless people; connecting them with emergency shelter, housing, or critical services; and providing urgent, non-facility-based care. Eligible services include, but are not exclusive to:

(a) Conducting an initial assessment of applicant needs and eligibility;

(b) Providing crisis counseling;

(c) Addressing urgent physical needs, such as providing meals, blankets, clothes, or toiletries;

(d) Actively connecting and providing information and referrals to needed services;

(e) Cost of outreach including, but not limited to, marketing and outreach materials, translation and interpretation services and cell phone costs of outreach workers, etc.

(f) Case management activities;

(g) Emergency health services to the extent that other appropriate services and treatment are unavailable or inaccessible within the community;

(h) Emergency mental health services to the extent that other appropriate services and treatment are unavailable or inaccessible within the community; and

(i) Travel expenses incurred by outreach workers, social workers, medical professionals or other service agency employees during the provision of allowable street outreach services.

(B) *Emergency and Transitional Shelter*

(1) Shelter Facility Operations

EHA (and DRF/DRF VET) and **SHAP** funding can pay for the costs of maintaining and operating **Emergency or Transitional Shelter** facilities whose primary purpose is to provide temporary or transitional shelter to the general homeless or specific populations of the homeless. Eligible facility costs include, but are not exclusive to:

(a) Lease or rent payments for shelter facility;

(b) Utilities for shelter facility;

(c) Security equipment or service to operate shelter facility;

(d) Janitorial supplies and service to operate shelter facility;

(e) Facility management;

(f) Repairs to facility (for rehabilitation or conversion costs see Section 5F of this manual);

(g) Furnishings for shelter facility; and

(h) Hotel/Motel vouchers for clients.

(2) Shelter Resident Support Services

EHA (and DRF/DRF VET) and **SHAP** funding can pay to meet the essential needs of shelter residents to facilitate transition out of shelter into more stable housing. Support services must be made available to households that receive hotel or motel vouchers to ensure quick and successful transition to more stable housing. Eligible support service costs include, but are not exclusive to, at the discretion of the subgrantee or subrecipient case manager:

(a) Intake and case management including pre-eligibility determination for housing and other needed services;

(b) Housing relocation (e.g., first and last month's rent payments and arrearages, manufactured home rental space "lot rent", application fee, security deposit, utility deposit);

(c) Purchase of identification and driver's license;

(d) Purchase of birth certificates;

(e) Credit repair assistance (not debt payment);

(f) Tenant readiness education;

(g) Food and clothing;

(h) Crisis intervention/counseling;

(i) Transportation; and

(j) Client direct services.

(C) *Transitional Housing*

EHA (and DRF/DRF VET) funding can pay for temporary housing and services intended to facilitate a homeless household's transition to permanent housing within a reasonable amount of time (usually less than 24 months). Transitional Housing is designed to provide interim support to successfully move to and maintain permanent housing and will require program participants to sign either a lease or an occupancy agreement.

Eligible services include, but are not exclusive to:

(1) Transitional housing operational costs such as rent, maintenance, security, utilities;

(2) Rent subsidy;

(3) Housing relocation assistance, including staff time locating permanent housing and related upfront housing costs, such as application fees, moving costs, deposits;

(4) Support services, such as purchase of birth certificates, identification and driver's license; credit repair assistance (not debt payment), tenant readiness education, food and clothing, crisis intervention/counseling, transportation, direct client services;

(5) Case management; and

(6) Education and training in such areas as personal finance and budgeting, job search and access to job training, and literacy.

(D) *Homelessness Prevention and Rapid Re-Housing*

EHA (and DRF/DRF VET) can pay for prevention services to enable households who are at imminent risk of homelessness or unstably housed to regain stability in their current housing or other permanent housing.

EHA (and DRF/DRF VET) funding can pay for rapid re-housing services to enable households who are literally homeless to transition directly to permanent housing.

CVRRP funding can pay for homelessness prevention rent assistance and rapid re-housing rent assistance.

Eligible homelessness prevention and rapid re-housing services include, but are not exclusive to:

EHA (and DRF/DRF-VET): Homelessness Prevention and Rapid Re-Housing
• Housing costs such as rent payments, late fees and arrearages; • Manufactured home rental space "lot rent" or RV space lot for primary housing; • Utility payments and arrearages (other utility assistance programs must be deferred to first, utility assistance is only eligible when other utility assistance cannot be obtained and providing utility assistance is necessary to ensure stability in housing) (utilities is inclusive of water, sewer, gas, garbage, electricity), • Moving costs, security and utility deposits and application fees; • Landlord engagement (such as incentives, communication, newsletters, etc.); • Client direct services; • Case management and housing relocation assistance; and • Self-sufficiency activities including education and training in such areas as personal finance and budgeting, job search and access to job training and literacy.
CVRRP: Homelessness Prevention Rent Assistance and Rapid Re-Housing Rent Assistance
• Housing costs such as rent payments, late fees and arrearages (one-time payment of arrears may be paid for past due rent incurred before inception of program); • Manufactured home rental space "lot rents" or RV space lot for primary housing; • Utility payments and arrearages (other utility assistance programs must be deferred to first, utility assistance is only eligible when other utility assistance cannot be obtained and providing utility assistance is necessary to ensure stability in housing) (utilities is inclusive of water, sewer, gas, garbage, electricity); and • Moving costs, security and utility deposits and application fees.

*CVRRP funds are **not** eligible for case management, housing navigation or other staffing expenses.*

(E) *Supportive In-Home Services*

EHA (and DRF/DRF VET) funding can pay for supportive services designed to enable persons to continue living in their own homes when in-home supportive programs are not available or accessible in their service area. Case manager must document in the client file, the efforts to find other in-home service options. Eligible services include, but are not exclusive to:

(1) Housing modifications to address mobility or safety barriers;
(2) Life skills training and assistance;
(3) Short-term personal care assistance;
(4) Case management;
(5) Needs assessment and linkage with appropriate health care management and safety services;
(6) Linkage with family support and/or community social support networks; and
(7) Costs to cover emergency situations that threaten the health and safety of the household.

(F) *Shelter or Transitional Housing Facilities Acquisition, Rehab/Conversion*

[Refer to your Master Grant Agreement for additional information about procurement requirements. ORS 456.555, 559, 561; 458.625]

EHA (and DRF) funding can be used for the acquisition, rehab or conversion of emergency shelter and transitional housing for households who are homeless or unstably housed and at risk of homelessness.

SHAP funding can be used for acquisition, rehab or conversion of emergency shelter for households who are homeless.

Use of EHA and SHAP funding for acquisition, rehab or conversion must have a separate approved Real Estate Application before entering into a contract or before funds are expended. For the Real Estate Application, contact your OHCS Program Analyst.

(G) *Community Capacity Building*

Homeless services funding is not adequate to ensure that all people experiencing homelessness receive the holistic services they need to obtain housing and remain stable. It is essential for community action agencies to work collaboratively with community partners to provide wrap-around support. **EHA (and DRF)** funding can be used to support projects and activities that increase a subgrantee's service area's capacity to provide emergency housing and services.

Community capacity projects must be defined and approved in the subgrantee's Implementation Report. Allowable activities include, but are not exclusive to:

(1) Expand partnerships and supports in the coordinated entry system;
(2) Advance efforts to locate and increase the number of shelter beds;
(3) Purchase of incentives to attract unsheltered persons to participate in the Point-in-Time Count;
(4) Expand community partnerships and stakeholders providing wrap-around services to homeless individuals and families;
(5) Implement feasibility studies for improving and increasing shelter and services that serve homeless and at-risk individuals and families;
(6) Provide matching funds to Continuum of Care planning grants;
(7) Develop and increase landlord engagement;
(8) Representation of the community's underserved population in decision making capacities; and
(9) Increasing skills, knowledge and resources for residents of the community (such as board training or citizen representative participation on Advisory Boards; education campaign for community groups about the people experiencing homelessness in their communities, or forming a coalition of service providers and the area's Coordinated Care Organization).

(H) *Data Collection*

EHA (and DRF/DRF VET) and **SHAP** funding may be used to support staff and related costs necessary to collect and report shelter bed nights, client services, client demographic data, performance outcomes and other reporting requirements. Eligible data collection costs include, but are not exclusive to:

(1) HMIS licenses;
(2) Data entry;
(3) Equipment upgrade;
(4) Network systems upgrade (it is recommended that systems be networked); and
(5) Staff training.

(I) *Ineligible Costs*

(1) State Homeless Funds may not pay for mortgage payments or mortgage payments for manufactured homes being purchased by the applicant receiving these state funds.
(2) State Homeless Funds may not be used for the purchase of gift cards, with the single exception of gas payments as a transportation expenses. See definition of transportation in the Definitions section of this manual.
(3) CVRRP funds are **not** eligible for case management, housing navigation or other staffing expenses.

6. Financial Management

(A) *Administration*

[ORS 458.625, 650; OAR 813.046, 049, 240]
Administration is not applicable to CVRRP.

Subgrantees are allowed to use up to fifteen percent (15%) of their total EHA and SHAP allocation for administrative costs, including those allowed for subrecipient organizations with whom the subgrantee contracts.

Allowable administrative costs 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.

Allowable costs include, but are not limited to:

- Senior executive management personnel salaries and benefits (unless they are directly involved in program operations), administrative staff travel costs;
- General services such as accounting, budget development, personnel, contracting, marketing, agency audit, agency insurance;
- Board expenses;
- Organization-wide membership fees and dues specific to homeless systems and programs;
- General agency facilities costs (including those associated with executive positions), such as rent, depreciation expenses, and operation and maintenance (as part of the organization's direct or indirect cost allocation plan); and
- Equipment rental/purchase, insurance, utilities, and IT costs that are not program specific but relate to the administration of the agency as a whole.

(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*

[OAR 813.046, 049, 240]

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.

EHA DRF program funds may be used for all EHA-eligible components and expenditures and does not require the submission of a budget change request, except for acquisition/rehab. Submission for budget change requests of DRF funds to acquisition/rehab will occur after the Real Estate Application has been submitted and approved.

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 form electronically to: crd.reports@oregon.gov.

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 form electronically to crd.reports@oregon.gov.

(E) *Funds Spend Down*

Subgrantees are expected to fully obligate or expend grant funds during each funding cycle and after expending funds from a previous funding cycle. OHCS will review subgrantee's grant spending in accordance with subgrantee's Master Grant Agreement and OHCS policy. Contact your OHCS Program Analyst for any questions regarding your expenditure of funds.

(F) *Match*

[ORS 458.625]

EHA funds can be used as match for case management costs and supplemental rent subsidy for qualifying OHCS and CoC projects, inclusive of case management for clients entering into or are in permanent supportive housing and need assistance to stabilize. OHCS may require subgrantee to submit periodic reports of this EHA usage.

(G) *Purchasing*

Purchases of equipment or property are subject to additional provisions and requirements as stated in the Master Grant Agreement Standard Terms and Conditions and Special Provisions exhibits. Fixed assets with a value greater than $5,000, includes computer

equipment, electronic equipment, photography equipment, hand tools and other items. Title to all equipment purchased in whole or part with OHCS funds must be in the name and possession of the subgrantee. Subgrantee shall prohibit its subrecipients from using OHCS funds to purchase equipment. Disposal of any item having an original cost of more than $5,000, and which is currently valued above $5,000, requires prior OHCS consent. Property and equipment purchased with OHCS grants shall not be used for collateral or to secure financing.

Purchasing contracted services should only occur when the skills, knowledge and resources are not available within subgrantee's organization or the subgrantee is unable to complete the work within require time limitations. A contractor must be registered to do business in Oregon and have necessary credentials of expertise. Subgrantee is expected to obtain multiple bids or pricing. If using a sole source contract, subgrantee must have written documentation to explain why they were not able to obtain more options.

7. Data Requirements

(A) *Data Entry*

Subgrantees and their subrecipients are required to enter **EHA, CVRRP (and DRF/DRF VET)** and **SHAP** related client and service data into the ServicePoint 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/Pages/best-practices-hmis.aspx.

(B) *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.

(C) *Data Entry Requirements for Shelters*

Emergency or transitional shelters, day or mass shelters, or hotel/motel vouchers are required to collect data and report outcomes using the Entry/Exit method of data collection.

Regardless of the method used to track shelter use, subgrantees and subrecipients must be able to determine who and how many people were served by a shelter or shelter type for any given night, based on HMIS data.

(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 Transitional Housing, 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)

Additional Elements collected on CVRRP

25. How impacted by COVID 19

(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.

A Comparable Database 101 document is available on our website at:
https://www.oregon.gov/ohcs/Pages/best-practices-hmis.aspx

(F) *Reporting Requirements*

[OAR 813.046, 049, 240]

Subgrantees are required to submit quarterly program reports by the 20th of the month following the end of each quarter in accordance with OHCS Master Grant Agreement directives for content and format. Subgrantees are required to submit an annual report within the timeframe set by OHCS. At the discretion of OHCS, other reports may be required when deemed necessary to provide program utilization and performance information. Subrecipient reporting to subgrantee must occur timely, so that subgrantees can meet the required deadline for reports to OHCS. Assistance with HMIS data entry, data quality and reporting may be found on our website at: https://www.oregon.gov/ohcs/Pages/best-practices-hmis.aspx

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.

A client services or housing plan is required for those clients **receiving more than one time only** services and must be in the case file. Existing assessments and active case plans with other providers may be used and included in the client 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 homeless status. All other shelter provisions, including issuance of hotel/motel vouchers, require that client eligibility documentation be maintained in the client file.

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*

[OAR 166.300; OAR 813.046, 049.240]

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*

[OAR 166.300; OAR 813.046, 049.240]

Subgrantees and subrecipients shall retain all program records pertinent to client services and expenditures incurred under EHA, CVRRP and SHAP 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).

Find the State Agency General Records Retention Schedules at the Oregon State Archives: (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 EHA, CVRRP and SHAP funding, or until the conclusion of any audit, controversy or litigation arising out of, or relating to, EHA, CVRRP and SHAP.

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9. Applicable Rules and Regulations

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

1. ORS 456.515 through 456.725 (OHCS): https://www.oregonlegislature.gov/bills_laws
2. ORS 458.505 through 458.545 (Community Services): https://www.oregonlegislature.gov/bills_laws
3. ORS 458.600 through 458.650 (Oregon Housing Fund): https://www.oregonlegislature.gov/bills_laws
4. OAR 166-300 (Retention Schedule): https://sos.oregon.gov/archives/Pages/records_retention_schedule.aspx.
5. OAR 813-046 (EHA): https://secure.sos.state.or.us/oard/ruleSearch.action
6. OAR 813-240 (SHAP): https://secure.sos.state.or.us/oard/ruleSearch.action
7. HMIS Data Standards Manual: https://www.oregon.gov/ohcs/Pages/best-practices-hmis.aspx
8. 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
9. **This manual** as guidelines for EHA, SHAP and LIRHF are amended from time to time along with all other references made within this manual. All references made in this manual are understood to be as written, and as amended from time to time.
10. **ORS** cited are amended from time to time and can be found at: https://www.oregonlegislature.gov/bills_laws/Pages/ORS.aspx
11. **OARs** cited are amended from time to time and can be found at: http://arcweb.sos.state.or.us/pages/rules/access/numerically.html

10. Definitions

A. Case Management Expense is inclusive of

- Intake and assessment, including time spent assessing a household, whether or not the household is determined eligible;
- Direct client services includes developing an individualized housing and service plan, monitoring and evaluating household progress, identifying creative and immediate housing solutions outside of the traditional homeless service system (diversion), and ensuring that households' right are protected;
- Services that increase access to the income supports of disability benefits programs administered by the Social Security Administration for eligible adults who are experiencing or at risk of homelessness and have a serious mental illness, medical impairment, and/or a co-occurring substance use disorder (i.e., SOAR or similar style services);
- Services for clients entering into or are in permanent supportive housing and need assistance to stabilize;
- Placement services includes services or activities designed to assist households in locating, obtaining, and retaining suitable housing, tenant counseling, assisting households to understand leases, inspections, securing utilities, making moving arrangements, and representative payee services concerning rent and utilities;
- Mediation and outreach to property owners/landlords related to locating or retaining housing;
- Outreach services;
- Connecting clients to resources;
- General liability insurance and automobile insurance;
- Training; and
- Salary, benefits of staff performing case management services.

B. Client Direct Services are the provision of good or payments of expenses not included in other allowable expense categories, which directly help a household to obtain or maintain permanent housing or meet essential household needs, as documented in the client service or housing plan. Consumer debt payments are not allowed as a client direct service. Prior approval by the case manager's supervisor is required before goods or payments are delivered.

C. Code of Conduct Agreements may be required by any type of shelter facility. A Code of Conduct Agreement may required that clients adhere to the shelter facility's rules and expectations of behavior and may be signed by the client. Code of Conduct Agreements are not the same as Occupancy/Lease/Rental Agreements.

D. Emergency Shelter means a facility whose primary purpose is to provide temporary shelter to homeless households or specific populations of the homeless and which do not require occupants to sign leases or occupancy agreements. Emergency shelters types may include, but are not limited to:

- **Low-Barrier Shelters:** shelters with limited entry requirements that enable people, who otherwise may not be willing or able to access shelter services, to be off the streets. Low barrier shelters may not expect residents to abstain from using alcohol or other drugs, or from carrying on with street activities while living on-site, so long as they do not engage in these activities in common areas of the house and are respectful of other tenants and staff. Low barrier shelters may allow pets, allow couples to stay together, and may provide secure storage space for personal item. Low-barrier shelters are a state priority and should be implemented whenever feasible.
- **High Barrier Shelters:** shelters where residents must meet specific entry requirements such as passing a sobriety/drug or alcohol test, criminal background check, allow belongings to be searched, have a specific level of income, participate in program activities, etc.
- **No-Barrier Shelter:** shelters where residents are not required to meet any specific entry requirements.
- **Abstinence-Based or Dry Shelter:** shelter where residents are not allowed to drink alcohol or use other drugs while in tenancy. Residents are expected to be "clean" before moving in and actively working on their recovery while living there and may be discharged from the program if they refuse treatment for a relapse.
- **Wet Shelters:** shelter where residents are not expected to abstain from using alcohol and other drugs, and where entering a rehabilitation program is not a requirement. Residents have access to recovery services and get to decide if and when they use these services.
- **Damp Shelters:** shelter where residents do not need to be "clean" when entering the program but are expected to be actively working on recovery from substance use problems.
- **Day Shelters:** temporary daytime accommodations and services for individuals and families who meet the definition of literally homeless as described under Client Eligibility and are sleeping on the streets, lack a fixed, regular and adequate nighttime shelter and/or are living in an emergency shelter.
- **Emerging Models of Shelter**: may include “sleeping pods”, “conestoga huts”, “sanctioned rest stops” or “sanctioned camping areas”, etc.
- **Warming Shelters:** warming shelters are a short-term, emergency shelter that operates when temperatures or a combination of precipitation, wind chill, wind and temperature become dangerously inclement. Their paramount purpose is the prevention of death and injury from exposure to the elements.
- **Transitional Shelters:** emergency shelter projects with a primary purpose to provide temporary or transitional shelter and essential services to all eligible clients in general and/or for specific populations of the homeless. Some transitional shelter programs have a comprehensive service focus and participants may stay for a period of time based on client need. Transitional shelters are different from transitional housing, as they do not require an occupancy/rental/lease agreement. Transitional shelters may require a code of conduct agreement.
- **Mass Shelters:** high volume, high turnover emergency shelters where multiple individuals and/or family households sleep.

- **Hotel/Motel Vouchers:** used as emergency shelter in those areas and times when no emergency shelter is available.
- **Vehicular Shelters:** vehicular shelters provide clients with a place to park their vehicle that is secure and free from ticketing, where they have access to garbage and sanitation services, onsite management that ensures the safety of participants, site cleanliness and adherence to site rules. Participants in vehicular shelters are provided access to client services.

E. EPIC Outcomes Tool is a table listing a selection of performance measures and outcomes under each of the four headings of Ending Homelessness, Preventing Homelessness, Inclusion and Diversity; and Capacity of the Community. CAAs will have the opportunity to choose additional performance measures from this listing.

F. Essential Components of Service Delivery are included in the MGA Operational Standards. They are the use of Housing First, maximizing participation in Coordinated Entry, ensuring availability of Low-Barrier Shelters in the community, incorporating the Lived Experiences of Homelessness into program design and implements and ensuring service provision has components for Equity and Racial Justice.

G. Housing First is an approach to quickly and successfully connect individuals and families experiencing homelessness to permanent housing without preconditions and barriers to entry, such as sobriety, treatment or service participation requirements.

H. MGA Operational Standards are specific identified criteria used to set a foundation of administrative, fiscal and service delivery expectations for CAAs. The purpose of establishing the standards is to ensure that no matter where individuals and families enter the homeless system, Oregonians will be provided the same access to quality services.

I. 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.

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 homeless families with children). (For example, for the purposes of HSP, TANF clients are a priority as required by the federal funds.)

K. Rent arrearage is past due rent owed (and other rental-related expenses incurred such as filing fees, court fees or lease break fees required by prospective landlord) to a current, prospective or previous landlord. If arrears are owed to a previous landlord or to a collection agency, these arrears may be paid, but only when there is **documented evidence** that payment of the arrears is necessary for the participant to obtain permanent housing and maintain stability in that housing. Payment of arrears is restricted to a one-time payment for up to 6 month's past due rent. Subgrantees and subrecipients have the discretion to limit payments for rent arrearage.

L. Target Population means persons a subgrantee/subrecipient wishes to reach out to who are under-represented in their service population.

M. Transportation Payments may include bus/train passes, fuel vouchers, vehicle insurance payments or vehicle repair. Payments that allow clients to use public transportation are the highest priority; however, case managers have the discretion to provide payments for private transportation. Case managers must document why private transportation options are preferred over public transportation options and that the expense will lead to the stabilization of housing. Car repairs for a vehicle not owned by an individual in the household are not allowed and client must have a valid driver's license. Gift cards may be used ONLY as a gas payment and the expense must have a receipt in the file. If there is no receipt of purchase using the gift card, the cost would not be allowed.

N. 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. Utility arrears assistance must result in utilities being turned on at the new permanent housing location. If arrears are owed to a previous utility company or to a collection agency, these arrears may be paid, but only when there is **documented evidence** that payment of the arrears is necessary for the participant to obtain utility service.

O. Veteran means a person who:

- Served on active duty with the Armed Forces of the United States:
  - For a period of more than 90 consecutive days beginning on or before January 31, 1955, and was discharged or released under honorable conditions;
  - For a period of more than 178 consecutive days beginning after January 31, 1955, and was discharged or released from active duty under honorable conditions;
  - For 178 days or less and was discharged or released from active duty under honorable conditions because of a service-connected disability;
  - For 178 days or less and was discharged or released from active duty under honorable conditions and has a disability rating from the United States Department of Veterans Affairs; or
  - For at least one day in a combat zone and was discharged or released from active duty under honorable conditions;
- 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
- Is receiving a nonservice-connected pension from the United States Department of Veterans Affairs.