



OREGON HOUSING *and*
COMMUNITY SERVICES

Oregon Rehousing Initiative (ORI)

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Program Overview

1. Program Summary

Oregon Housing and Community Services (OHCS) created the Oregon Rehousing Initiative (ORI) in response to Executive Order (EO) 24-02, signed by Governor Kotek in 2024. The purpose of that executive order was to maintain the added capacity to the state's shelter system, rehouse people experiencing homelessness, and prevent homelessness. ORI is part of Oregon's broader effort to combat poverty and improve housing stability across the state. ORI aims to address homelessness through a comprehensive approach that includes Street Outreach, Rapid Rehousing, Unit Access, and data collection. ORI is funded through state general funds, and funds disbursed through ORI are intended to support placement into permanent housing. ORI centers on a Progressive Engagement approach that tailors the intervention for each Household's unique needs and allows up to 24 months of rental assistance to each Household placed in housing.

2. Program Intent

A. Critical Characteristics

This Rehousing program is intended to rapidly move Households along the continuum from homelessness to permanent, stable, and safe housing.

Rapid Rehousing programs have been demonstrated to be effective in getting people experiencing homelessness into permanent housing and keeping them there. Unit Access activities assist with rehousing programs by engaging landlords in the rehousing process. By connecting people with a home, they are in a better position to address other challenges that may have led to their homelessness, such as obtaining employment or addressing substance abuse issues. Rehousing programs have been used to provide shelter diversion services for families and individuals facing a temporary economic crisis, and they are also useful for those who need moderate levels of support for just a few months to 24 months. Rehousing programs can be successfully deployed for unsheltered populations through Street Outreach services or as part of a housing-focused shelter system, where the intervention has been shown to reduce shelter lengths of stay significantly. Data collection activities assist with the tracking of

program metrics that measure program effectiveness and efficiency from Street Outreach through program exit, better informing program implementation.

B. Core Components

There are three core components to Rapid Rehousing: housing identification, rent and move-in assistance, and case management and services. While each ORI Grantee must make all three available, it is not required that a single entity provide all three services or that a Household utilize them all.

C. Strategies

Grantees/Subrecipients should prioritize a housing-first approach with low barriers to entry and tailored services that allow a Household to access a range of supports, including housing placement, employment support, behavioral health, childcare, and others. ORI utilizes a Progressive Engagement Approach to Rapid Rehousing. Progressive Engagement is an approach to helping Households end their homelessness as rapidly as possible, despite barriers, with individually tailored financial and support resources. Through Progressive Engagement, assistance may be provided to any Household entering the homelessness system at a level needed. In many cases, a Household may need a small amount of assistance to stabilize, while others may need more resources and tailored assistance.

3. Guiding Principles

A. Lead with racial equity

Racial equity is achieved when one's racial identity is no longer, in a statistical sense, predictive of disparate housing, economic, and health outcomes. Instead, outcomes for all racial groups are improved. Racial equity includes addressing the root causes of inequities. OHCS strives to embed racial equity into the design, implementation, performance measures, and monitoring of our work. Some examples of leading with racial equity include:

1. Eliminating policies, practices, attitudes, and cultural messages that reinforce differential outcomes by race or otherwise fail to address them. Achieving racial equity is a process. This means that Black

people, Indigenous people, and people of color (BIPOC)—those most impacted—are part of the decision-making about funding, policies, and programs;

2. OHCS is committed to advancing racial equity and justice. OHCS' racial equity work is informed by national promising practices and the lived experiences of communities of color. OHCS commits to an intentional, data-driven approach to reducing disparities in housing and social service provision. OHCS is continuing to develop additional guidance and information to further identify how OHCS and Grantees can advance equity and racial justice within state and federally funded programs. To achieve racial equity in the community, government (local, regional, and state) must be working in partnership with the community and other institutions; and
3. In recognition that Black people, Indigenous people, and people of color (BIPOC) across Oregon continue to be disproportionately impacted by the crisis of homelessness, the Oregon Rehousing Initiative is prioritizing resources for Culturally Responsive Organizations to support those communities most impacted.

B. Remove barriers and simplify processes

Structure the program's design and operation to be streamlined, offering support where applicable to rehouse a Household with minimal barriers for both Participants and landlords. Program design should be intentional to reduce barriers to housing.

C. Support local flexibility and responsiveness

Allow for local flexibility where possible to build on previous rehousing initiative investments.

D. Strengthen relationships with landlords

Building strong partnerships with landlords is essential to addressing each community's unique needs. Landlords are vital in preventing evictions and helping individuals and families find new homes. For example, partnering with landlords to make more units accessible to those in need can make a real difference in ending homelessness.

Participant Eligibility

1. Eligibility Criteria

Participant eligibility criteria for the Oregon Rehousing Initiative are summarized in the following chart and described in more detail below:

Participant Eligibility	Description
Housing Status	• Category 1: Literally Homeless, including those living in a shelter, unsheltered, or exiting an institution. • Category 3: Homeless Under Federal Statutes • Category 4: Fleeing/Attempting to Flee Domestic Violence
Household Composition	• An individual living alone • Family with or without children; or • A group of individuals who are living together as one economic unit
Income Requirement	• No income requirements
Citizenship	• Citizenship may not be used as a basis of program decisions for Grantees and Subrecipients.
Oregon Inhabitancy	• Those who are inhabiting and intending to reside within Oregon • For Category 4 housing status, funds may be used for eligible categorical costs associated with moving out of Oregon to a safe location. • If permanent housing is found outside of Oregon, funds may be used for eligible categorical costs associated with moving out of Oregon. • OHCS does not require strict adherence to Grantees or Subrecipients' service area boundaries.

Participant Eligibility	Description
Exiting Institutional Facilities	• No maximum time limit for days spent in an institutional care facility
Age	• No age restrictions

Grantees and Subrecipients are responsible for ensuring that Households admitted to ORI meet the eligibility requirements described in this section. Grantees and Subrecipients will conduct an initial evaluation of Participants at the time of Participant evaluation. If applicable, the evaluation must be conducted in accordance with local Continuum of Care (CoC) requirements. For Participant eligibility, Grantees/Subrecipients must determine which category of housing status each Household meets. Eligibility of Household shall be determined based on the housing status of the head of Household at the initial point of engagement. For questions or technical assistance, [please email ORI grant administrator](#).

A. Housing Status

Participants must meet one of the following housing status categories, which are based on the categories established by the U.S. Department of Housing and Urban Development in the definition of “homeless” found in 24 CFR 578.3.

Category 1: Literally Homeless—Individual or family that lacks a fixed, regular, and adequate night-time residence, meaning:

- a. Has a primary night-time residence that is a public or private place not designed for human habitation (including, but not limited to, a car, park, abandoned building, bus or train station, airport, or camping ground);
- b. Is living in a publicly or privately operated shelter designated to provide temporary living arrangements (including congregate shelters, transitional shelters, and hotels or motels paid for by charitable organizations or by federal, state, or local government programs); or

- c. Is exiting an institution where the individual or family has resided, if the individual or family resided in an emergency shelter or place not meant for human habitation immediately before entering that institution.

Category 3: Homeless Under Federal Statutes—Unaccompanied youth under 25 years of age, or families with children and youth, who do not otherwise qualify as homeless under another category, (literally homeless or fleeing/attempting to flee Domestic Violence) but who:

- a. Are defined as homeless under a federal statute, such as:
 - 1. Runaway and Homeless Youth Action (34 U.S.C. sec. 11201 to 11281);
 - 2. Head Start Act (42 U.S.C. 9801 et seq.);
 - 3. The Violence Against Women Act of 1994 (34 U.S.C. sec. 12511 to 12512) (VAWA);
 - 4. Section 330 of the Public Health Service Act (42 U.S.C. 254b and 254b-1);
 - 5. Food and Nutrition Act of 2008 (7 U.S.C. 2011 et seq.);
 - 6. Section 17 of the Child Nutrition Act of 1966 (42 U.S.C. 1786); and
 - 7. Subtitle VII-B of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11431 et seq.)
- b. Have not had a Lease, ownership interest, or Occupancy Agreement for permanent housing during the 60 days prior to the ORI assistance eligibility determination;
- c. Have experienced persistent instability as measured by at least two moves during the preceding 60 days; AND
- d. Can be expected to continue in such a status for an extended period of time due to special needs or barriers.

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

- a. Is fleeing or attempting to flee Domestic Violence;
- b. Has no other safe residence; AND
- c. Lacks the resources or Support Networks to obtain other permanent housing.

B. Household Composition

An eligible "Household" may consist of an individual living alone, a family with or without children, or a group of individuals who are living together as one economic unit. The Household shall be determined without regard for actual or perceived sexual orientation, gender identity, or marital status.

C. Income Limits

There is no income eligibility requirement for the Oregon Rehousing Initiative. However, regional programs may establish income limits for eligibility. Where income limits have been established, Grantees/Subrecipients will evaluate income eligibility at the time of program admission. Income limits help determine program eligibility by comparing an applicant's Household's annual income to the relevant income limit based on Household size, as established by the Grantee. Should the Grantee choose to implement income limits, they must notify the OHCS grant administrator through the quarterly reporting process via an OHCS-provided template.

D. Citizenship

The Oregon Rehousing Initiative does not require Grantees/Subrecipients to obtain or verify Social Security Numbers (SSNs) or documentation proving citizenship before enrolling Households in the program. Decisions regarding program participation may not be based on citizenship status.

E. Residency

1. Oregon Inhabitancy

Services are only available to those who live in and intend to remain in Oregon; however, there is no minimum amount of time a Participant must be present in the state of Oregon prior to being eligible for ORI.

However, there are exceptions given in the following situations:

- a. If a Household's documented housing status is Category 4, Fleeing Domestic Violence, ORI funding may be used for eligible categorical costs associated with moving out of Oregon to a safe location. In this situation, documentation is required in the Participant's service/housing plan that confirms that the

Participant's destination is a verified safe housing option and that no funds are used for rent, hotel or motel stays, utilities, or other services in a state other than Oregon. Such allowable costs are restricted to moving costs;

- b. ORI funds may also be used for Households that meet other ORI eligibility criteria to pay for eligible costs associated with moving out of Oregon to a permanent housing destination, provided there is documentation in the Participant's case file confirming the destination as a permanent housing destination and that no funds are used for rent, hotel or motel stays, utilities, or other services in a state other than Oregon. Such allowable costs are restricted to moving costs.

2. Service Area Boundaries

OHCS does not require strict adherence to Grantees' or Subrecipients' service area boundaries. Participants may start intake and assessment with one Grantee or Subrecipient and then find housing in or move to another Grantee or Subrecipient's service area. OHCS recommends coordination or a soft hand-off between Grantees and Subrecipients to meet Participant needs and continue support. Roles and responsibilities should be clearly identified to effectively support the Participant.

F. Exiting Institutional Facilities

Individuals or Households exiting institutional care facilities (e.g., hospitals, jails, substance abuse or mental health treatment facilities, or other similar facilities) are eligible if the individual or Household was experiencing homelessness before entering the institutional care facility. There is no maximum time limit for days spent in an institutional care facility that would make an individual or Household ineligible for the Oregon Rehousing Initiative. This differs from HUD's definition of homelessness, which states that time spent in an institution must not exceed 90 days to avoid being considered a break in homelessness. OHCS acknowledges the importance of recognizing the entry point for communities and is expanding the eligibility criteria for Rapid Rehousing accordingly.

2. Eligibility Documentation

All Participant eligibility information must be documented in Participant files, in a secured hard or electronic file, and available to OHCS upon request in

the format requested by OHCS. Grantees must refer to HUD's documentation verification hierarchy, where written third-party verification is the applicable first preference (e.g., paystubs, bank statements, payroll summary reports, Social Security Administration benefit award letters, etc.). When lower verification preferences are used, such as self-certification, attempts to obtain higher verification preferences must be documented in the Participant file.

General Program Requirements

1. Prioritizing Equity and Racial Justice in Programming

Grantee is encouraged to prioritize equity and racial justice in its programs.

This means that the Grantee proactively considers steps to ensure that programs are designed and implemented in a representative fashion in the communities served, with racial justice at the forefront of service delivery by:

- a. Proactively ensuring that programs are accessible to all eligible individuals and organizations, regardless of race, color, national origin, religion, sex, familial status, or disability;
- b. Taking proactive steps to reach out to and engage with communities that have been historically underserved or marginalized. This should include direct engagement with people who have lived experience of homelessness to inform program design and strategy, and deliver higher quality services.
- c. Ensuring that programs are designed and implemented in a way that considers and values equity and racial justice. This may include, but is not limited to:
 1. Providing targeted outreach to historically underserved or marginalized communities;
 2. Ensuring that application review and selection processes are fair and unbiased; and
 3. Utilizing data analysis, community input, equity-based decision making, and continuous quality improvement led by people with lived experience to inform programmatic decisions.
- d. Providing technical assistance and support to help Subrecipients ensure equity and racial justice within programming;

- e. Complying with all applicable fair housing laws and the equal protection clause of the 14th Amendment to the U.S. Constitution. Please consult your legal counsel for advice on program design and determining criteria for Participant eligibility; and
- f. Prioritizing incorporating the lived experience of homelessness into program design, implementation, and evaluation. See more in General Program Requirements under section 2, Lived Experience.

2. Lived Experience

Grantees must incorporate the lived experience of homelessness into their program design and implementation. Incorporating lived experience is a commitment and a framework for including everyone, especially people with lived experience, in planning, implementation, and evaluation.

Lived experience best practices include, but are not limited to:

- a. Bringing the perspective of people with lived experience to the forefront by ensuring that no one is left out or misrepresented. Grantee ensures that communications, fundraising, research, and programs do not reinforce the misconceptions that homelessness is caused by individual problems or can be solved by charity. In addition, using professional influence to help advance the goals identified by first voice people and dedicating time and resources to advocacy and supporting grassroots social change efforts.
- b. Including people with lived experience at all levels of the organization by ensuring they are: hired in positions at all levels within the organization; invited to join the organization's board and committees; included in creating the Grantee's equity and diversity policies. Additionally, they should serve as liaisons within municipal governments, such as city councils and police boards, and the Grantee should work toward sustainability and advancement for peer positions so that those hired as peer counselors or researchers can advance to permanent positions.
- c. Valuing the time of those with lived experience by: providing appropriate supports, anticipating the compensation required, and including those costs within the organization's budget; properly including people with lived experience; creating a welcoming environment in which it is safe to express emotions; providing training

and capacity building to all members of the organization; and ensuring timeframes for lived experience initiates work at a reasonable pace.

- d. Challenging stigma, confronting oppression, and promoting dignity by: providing training that addresses these issues to the whole organization; confronting oppression; educating around the intersectionality of racism, sexism, classism, and ableism and how they work together and reinforce each other; and reviewing organizational policies and practices to ensure they promote equity, dignity, and the rights of people facing homelessness.
- e. Recognizing lived experience expertise and engaging those with lived experience in decision-making by mandating that they are included in decision-making roles in the organization and including them in influential roles, allowing them to speak when they can, using social media and other platforms and methods as they are available.
- f. Working together toward equitable representation by: including equitable representation in the organization's strategic planning process; setting concrete objectives and specific timeframes; working with other organizations that have successfully implemented equitable representation; and evaluating the organization's progress, seeking input from people with lived experience in the process.
- g. Building authentic relationships between people with and without lived experience by: cultivating an environment of caring, acceptance, and openness where differences are celebrated, and everyone's contribution is acknowledged; ensuring that all members of the organization are included in social activities and that those activities are accessible to all; and breaking down rigid roles such as "service provider" and "service user".

3. Coordinated Entry

Coordinated Entry (CE) is a centralized, coordinated process for Participant intake assessments and referrals. This centralized system covers the geographic area, is easily accessible to individuals and families seeking housing or services, is well-advertised, and includes a comprehensive and standardized assessment tool. OHCS defers to the local Continuums of Care (CoC) to determine if ORI Grantees and Subrecipients will use Coordinated

Entry for ORI-funded services in that CoC's geographic area. While OHCS encourages the use of CE for ORI-funded services, it is not required. If an ORI Grantee would like to use the CE system in their region, they must consult their local CoC to determine whether it is willing to make any necessary adaptations to the CE system to accommodate ORI program requirements.

4. Length of Assistance

The maximum length of rental assistance is 24 months per Household. OHCS recommends Grantees tailor the intervention for each Household's unique needs, including the length and amount of rental assistance provided.

5. Amount of Assistance

Rehousing programs will not be required to adhere to Fair Market Rent (FMR) constraints. Specific monthly rent assistance amounts may be determined by local programs, according to available funding.

6. Habitability Standards

To be considered eligible for permanent housing, housing facilities must align with Participant choice and should meet habitability standards, including minimum safety, sanitation, and privacy requirements outlined in 24 CFR Section 576.403. Grantees and Subrecipients must perform a habitability inspection and complete a Habitability Report for the ORI Program if performing Renovation, Rehabilitation, or Conversion on a unit. For more information, please reference, Allowable Program Components and Expenditures section 4, Unit Access.

Grantees that receive ORI 360 behavioral health pilot funding are exempt from the requirement to perform a habitability inspection and complete a Habitability Report when performing Renovation, Rehabilitation, or Conversion on a unit. This exemption only applies to activities performed under the ORI 360 behavioral pilot scope.

Grantees and Subrecipients must ensure a Household has a lease or sublease agreement in the Household's own name, unless OHCS approves an alternative plan. A copy of the lease or sublease agreement must be kept on file, unless otherwise agreed upon by OHCS, along with a copy of the pre-lease agreement inspection or formal documentation of the condition of the unit prior to move-in from the landlord.

Please see section 7 under General Program Requirements for more information on requirements for Transitional Living Programs, Oxford Housing Models and Alcohol & Drug Free Community Housing, and RV Housing Options. For questions and technical assistance around meeting habitability standards, please [email the ORI grant administrator](#).

7. Required Policies

The following policies are required for Grantees and their Subrecipients. These include policies about privacy, confidentiality, grievance and appeal procedures, nondiscrimination, limited English proficiency, and conflicts of interest.

A. Privacy Policy

Grantees and Subrecipients must have a written document that meets the requirements of this section and a Stand-Alone Policy that describes how Grantees or Subrecipients verbally provide their privacy notification to Participants.

A privacy notification must be provided to Participants either verbally or in writing that identifies the following:

“Personally identifiable information is protected by federal laws (Privacy Act of 1974, as amended) and will be collected for the purpose of determining program eligibility, providing assistance/service, data collection, reporting and monitoring.

Personally identifiable information will be shared with Oregon Housing and Community Services and other state agencies as is necessary to carry out the intent of an assistance or service program for the benefit of the person applying for such assistance or service and will be disclosed to Oregon Housing and Community Services without written authorization. Oregon Housing Community Services Program and Fiscal Compliance will not share the information to any other agency. Information obtained through monitoring is only shared with other agencies as necessary for monitoring purposes.”

Participants may also be asked by the Grantees or Subrecipients to sign a release of information that includes the privacy notification. If

required to sign a release of information, in addition to the information above, such form must include a statement that:

“Refusal to sign this authorization cannot be the basis for denying program services to otherwise eligible Participants.

Participant refusal to sign a release of information does not negate the inclusion of personally identifiable in secure reporting to Oregon Housing and Community Services. Whether or not a release is signed, Oregon Housing and Community Services will de-identify Participant demographic data for the purposes of reporting.”

Grantees and their Subrecipients must document in the Participant file that a privacy notification was provided to the Participant either verbally or in writing. When collecting personally identifiable information, Grantees and their Subrecipients must follow state and federal laws for the collection, use, and sharing of Participant information.

Grantees must ensure that Subrecipients have policies that align with OHCS requirements and are consistent with the intent of such a policy as outlined by OHCS. OHCS retains the right to require modification of any policy that it determines does not meet the requirements described in this guidance or comply with applicable statutes or administrative rules.

B. Confidentiality

Confidential records include all applications, records, files, and communications relating to Participants, regardless of format.

Policies and procedures pertaining to confidentiality must include:

1. Identification of how all Participant records are secured and confidentially maintained;
2. A statement that all Participant records must be maintained within state guidelines for the proper retention and destruction of records;
3. A requirement that all Grantee officers, employees, and agents are aware of and comply with the Grantee's confidentiality policy and acknowledge such policy in writing;

4. A provision for the electronic collection of Participant information, which states that:
 - a. Computer terminals must be in a secure location, limiting access to only those people who have a legitimate interest in and are responsible for Participant records;
 - b. Computer monitors must be cleared (or a screen saver activated) immediately after accessing a Participant record;
 - c. Computer terminals must be in “locked” mode or turned off if the terminal is unattended;
 - d. Access to personally identifiable HMIS data shall be given to only authorized personnel as necessary for performing the work required for OHCS-funded programs; and
 - e. All records shall be open for review by federal and state authorized representatives, auditors, and/or examiners in connection with regular audits and monitoring functions of OHCS-funded programs.

Grantees must ensure that Subrecipients have policies that align with OHCS requirements and are consistent with the intent of such requirements. OHCS retains the right to require modification of any policy that it determines does not meet the requirements described in this guidance or comply with applicable statutes or administrative rules.

C. Grievances and Appeals Procedure

Grantees are required to have an established, written Stand-Alone Policy for addressing Participant grievances/appeal requests. Grantees must ensure that Subrecipients have policies that align with OHCS requirements and are consistent with the intent of such requirements.

Participants must have the right and opportunity to grieve or appeal any decision that terminates, denies, limits, reduces, or modifies benefits for any reason. Participants must be notified of their right to grieve or appeal such decisions, and the Grantee's policy must clarify how and when Participants are notified of this right. Such grievance/appeal policy can be posted in a public place; however, Participants must receive a written notification for any decision that

terminates, denies, limits, reduces, or modifies any benefit, even if the reason for denial is a Grantee's/Subrecipient's lack of funding.

At a minimum, the grievance/appeal policy must include the following components:

1. Informs the Participant that they can contest any Grantee's or Subrecipient's decision that terminates, denies, limits, reduces, or modifies any benefits and identifies the steps to follow to contest the decision;
2. Informs the Participant of the reason for termination, denial, limitation, reduction, or modification of benefit;
3. Allows any aggrieved person a minimum of 30 calendar days to request an administrative review or appeal of such decision;
4. Informs the 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;
5. Identifies what reasonable accommodations are available for Participants who have language, mobility, or disability barriers that would prevent them from participating in the review or appeal process and how to request such accommodations; and
6. Informs the Participant and OHCS in writing of the final determination and basis for the decision within 10 calendar days of the final determination.

Other than the person who made or approved the decision under review/appeal or a subordinate of this person, any person or persons designated by the Grantee and Subrecipient can complete the administrative review or appeal.

OHCS retains the right to require modification of any policy that, in its sole determination, does not meet basic principles or requirements for such a policy as described in this section.

D. Nondiscrimination

Grantees are required to comply with all state and federal statutes relating to nondiscrimination. Grantees must have a Stand-Alone Policy that complies with the following:

1. Includes a statement that the Grantee will comply with all state, federal or local statutes, rules, and guidelines for all protected

classes and will not take any of the following actions based on race, color, national origin, age, religion, gender, familial status, disability (federal), victims of Domestic Violence, marital status, sexual orientation, gender identity, or source of income (state):

- a. Refuse to accept an application for housing assistance or services;
 - b. Deny an application for housing assistance or services;
 - c. Set different terms, conditions, or privileges for housing assistance or services;
 - d. Provide different or specific housing, facilities, or services;
 - e. Falsely deny that housing is available for inspection or rental or that services are available; or
 - f. Deny anyone access to a facility or service; and
2. Identifies how Participants can request reasonable accommodation to access assistance or services, how that process is communicated to Participants, and how those requests are processed.

Grantees must ensure Subrecipients have policies that align with OHCS requirements and are consistent with the intent of such requirements. OHCS retains the right to require modification of any policy that, in its sole determination, does not meet basic principles or requirements for such a policy as described in this section.

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 applications or provide information on services or available housing to any protected class, even if these groups do not fit into the targeting strategy, is prohibited.

Targeting of funds must not violate the Fair Housing Act or other applicable anti-discrimination requirements.

Screening criteria cannot be discriminatory and must be consistently applied. A Priority Population means persons who are determined to have the greatest need and will receive services first; however, priority cannot be used as a means of denying any person assistance, and refusal to accept applications or provide information on services, or available housing, to any protected class, even if these groups do not fit into the Priority Population, is prohibited.

OHCS reserves the right to require prioritization when such prioritization is intended from a specific funding source. Grantees and Subrecipients must adhere to such prioritization required by OHCS.

For more information, see the *Guide to Fair Housing for Homeless and Domestic Violence Shelter Providers* produced by the Fair Housing Council of Oregon, or [contact them directly on their website](#).

E. Limited English Proficiency

The abbreviated definition of persons with Limited English proficiency (LEP) is those who have difficulty reading, writing, speaking, or understanding English, and do not use English as their primary language.

Grantees must have a LEP Stand-Alone Policy that describes the following:

1. The actions Grantee took to identify LEP populations in their service area and any source(s) used for evaluation;
2. Actions Grantee will take to provide language assistance and address language barriers; and
3. How and how often staff will receive training about assisting people with LEP.

Grantee's LEP Stand-Alone Policy must provide for the evaluation of LEP populations at least biennially. Following each such evaluation, the LEP Policy must be updated to incorporate any needed changes to address new or emerging LEP populations.

Grantees must ensure that Subrecipients have policies that align with OHCS requirements and are consistent with the intent of such requirements. OHCS retains the right to require modification of any policy that it determines does not meet basic principles or requirements for such a policy as described in this section.

Grantees and Subrecipients can create a written Language Access Plan (LAP) to provide a framework to document how the program will be accessible to all populations in their service area. Grantees and Subrecipients who serve few persons needing LEP assistance can choose not to establish a LAP; however, the absence of a written LAP

does not release Grantees' and Subrecipients' obligation to ensure LEP persons have access to programs or activities.

F. Conflict of Interest

In the performance of work, program Grantees and Subrecipients will create no potential or actual conflict of interest, as defined by ORS Chapter 244 or ORS 65.361, as applicable, for a director, officer, agent, or employee of Grantee or Subrecipient. A conflict of interest exists if, among other things, a decision or recommendation could affect the finances of the Grantee's or Subrecipient's officers, agents, or employees or the finances of their officers, agents, or employees' relatives.

If a conflict of interest exists, the Grantee's or Subrecipient's officer, agent, or employee must always give written notice of the conflict, and the officer, agent, or employee may be restricted by Grantee's conflict-of-interest policies and applicable law from participating in the matter that presents the conflict of interest.

No Grantee or Subrecipient officer, agency, or employee may carry out the initial evaluation required to obtain services for any person in which an actual or perceived conflict of interest does or would exist, unless in rare circumstances it is in the interest of the Participant for the expediency of housing placement services or to create a seamless service delivery while keeping the Participant engaged in services and such situation is documented in the Participant file. This determination shall be made by the Grantee in accordance with the Grantee's conflict-of-interest policy and applicable law.

Grantee must have a conflict-of-interest policy that outlines the process for disclosing, in writing, any potential or actual conflict of interest and for addressing actual or potential conflicts of interest. This includes procedures for staff when employees, board members, friends, or family members apply for program services.

Grantees and Subrecipients must comply with the Grantee's conflict-of-interest standards for both individuals and organizations. Grantee and Subrecipient must keep records to show compliance with Grantee's conflict of interest requirements.

8. Records Access

Grantees and Subrecipients are required to permit OHCS, the Oregon Secretary of State's Office, and the duly authorized representatives of such entities access to, and the right to copy, all program Participant 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 removal of records from the Grantees' and Subrecipients' offices.

OHCS, including its authorized representatives and authorized third parties, will monitor the activities and records of Grantees and Subrecipients as it deems necessary or appropriate for, among other things, to ensure: (1) Grantees and its Subrecipients comply with the terms of the agreement, including but not limited to the program guidance, and that ORI grant funds are used properly for authorized purposes hereunder; and (2) that performance goals are achieved as specified in the agreement, notice of allocations (NOA), and the program guidance, and that performance is to the satisfaction of OHCS.

9. Records Retention

Grantees and Subrecipients shall retain all program records pertinent to applicant and Participant services and expenditures incurred under the Oregon Rehousing Initiative in a manner consistent with the requirements of state and federal law and in accordance with the grant agreement.

Records can be stored electronically; however, electronic records must be maintained securely and confidentially and be available in paper format if requested by OHCS for monitoring, audit, or other purposes. HMIS can be used as a method of document collection and Maintenance when it represents all required records and is appropriate.

Grantees and Subrecipients must retain and keep accessible all such fiscal and program records, Participant records, digital and electronic records, books, documents, plans, and writings for a minimum of six (6) years, or for such longer period as may be required by applicable law, whichever is later. Destruction of records must occur in a timely manner and comply with applicable law and retention schedules. Retention begins from the later of the date that final payment is made or from the termination of program

funding, or until the conclusion of any audit, controversy, or litigation arising out of, or relating to the program.

10. Program Compliance Monitoring

OHCS' Housing Stabilization Division's (HSD) program compliance section ("Program Compliance") is responsible for evaluating the risk of OHCS Grantees operating programs using public funds. Grantees will be monitored according to the written requirements for ORI operations, performance, and fund use outlined in ORI program guidance, legislation, administrative rules, and other written guidance. Program Compliance will monitor a Grantee once per funding distribution period but reserves the right to monitor more or less frequently, based on staff capacity and previously issued risk ratings. Program Compliance may require Grantees to complete a self-certification report in lieu of full monitoring.

Program Compliance will notify Grantees at least 30 calendar days before the monitoring kickoff. This notice will outline policies, procedures, Participant files, payment information, and other details that will be reviewed as part of monitoring. The monitoring review may take place in person or virtually, as determined by Program Compliance.

After completing the monitoring review, Program Compliance will provide the Grantee with a findings report within 30 calendar days that includes information on any findings identified in the monitoring process. Upon receipt of the findings report, Grantees will be given 30 business days to review, correct, respond, and/or dispute any findings identified.

As part of the monitoring, Program Compliance will issue a final risk rating report to the Grantee with the close-out letter. This rating will be based on the average of actual findings and the severity of those findings. Grantees will be rated as "No Risk," "Low Risk," "Moderate Risk," or "High Risk".

In addition to any of the remedies available to OHCS under a grant agreement, if Program Compliance determines a Grantee is of "High Risk," Program Compliance, HSD program staff, and the Grantee will create a corrective action plan which addresses areas of deficiency. The Grantee will be required to implement this plan with support from HSD Program staff. Creation and implementation of the corrective action plan does not waive any rights or remedies available to OHCS under the grant agreement or this Program guidance.

Once all findings are resolved and closed, Program Compliance staff will send out a final risk ratings report and close-out letter. Should the result of the monitoring require recapture of funds and/or a reduction in grant funding, instructions for any repayment will be provided at that time.

A. Subrecipient Monitoring

The term "Subrecipient" means an entity that, by contract with the Grantee agency, provides assistance payments or services to Participants. The Subrecipient may receive funding directly from the Grantee agency. Grantee must ensure all Subrecipients comply with applicable program rules and requirements as noted in this program guidance, administrative rules, legislation, and other written guidance and agreements.

OHCS requires Grantees to conduct a monitoring review of their Subrecipients once per performance period. Program Compliance reserves the right to direct Grantees to review Subrecipients on a more frequent basis, informed by previous risk ratings. Program Compliance will request records of Subrecipient monitoring reports for review during monitoring. The goal of Subrecipient monitoring is to ensure compliance with grant agreements, contracts, and program guidance, and the achievement of performance goals.

Program Compliance will provide training and technical assistance to Grantees on Subrecipient monitoring and oversight responsibilities. Program Compliance will provide documents to Grantees, which will assist in the monitoring of Subrecipient Participant files for eligibility and compliance with program guidance. The Grantee is responsible for follow-up on any deficiencies found in the Subrecipient reports. A follow-up report is required with supported documentation (e.g., pictures and reports).

As OHCS directs, Grantee monitoring of Subrecipient must include, but is not limited to, the following:

1. Evaluation of the Subrecipient's risk of non-compliance with rules, regulations, and guidance applicable to programs operated by the Subrecipient;
2. A review of documented policies and procedures related to program operation;

3. A review of financial and performance reports;
4. A review of Participant records for eligibility and denials of service compared to the written guidance;
5. A review of any required and completed physical inspections;
6. A review of documented policies and procedures related to document security, Maintenance, retention, and destruction, and adherence to these policies;
7. Follow up, including reinspection reports, within 30 calendar days on all identified deficiencies related to HSD (OHCS) funding in accordance with program rules, regulations, and contract agreements; and
8. A final closeout letter or report upon completion of the monitoring and resolution of findings.

Grantees must have a Subrecipient monitoring policy that identifies the following:

1. Frequency of Subrecipient monitoring, conducted at a minimum once per term of the Subrecipient funding agreement;
2. The number of relevant samplings of Participant files (both eligible and non-eligible), and that such review includes eligibility, notification, and documentation;
3. The number of relevant samples of HMIS or record-keeping entries to ensure appropriate entry and tracking of Participant information and service transactions;
4. A review of Subrecipient records to ensure compliance with Personally Identifiable Information (PII) security, Maintenance, retention, and destruction of records; and
5. A review of Subrecipient policies and procedures, forms, documents, and notifications to ensure compliance with all program, state, and federal rules, regulations, and guidance.

Program Compliance retains the right to require modification of any policy that, in its determination, does not meet the basic principles or requirements for such a policy as described in this guidance.

B. Physical Inspections

Grantees or their Subrecipients must perform a habitability inspection and complete a Habitability Report if performing Renovation, Rehabilitation, or Conversion on a unit. Please refer to Habitability Standards, Allowable Program Components,

and Expenditures of this program guidance for further information and guidance on this requirement. A copy of all completed inspections must be placed inside the Participant's file. Inspection records must be available for OHCS review or Program Compliance monitoring upon request.

Eligible Uses of Funds

Oregon Rehousing Initiative funding may be used in one or more of the following activities: Street Outreach, Rapid Rehousing, Unit Access, data collection, and administration. Quick Reference Table:

Eligible Expenses	Ineligible Expenses
Street Outreach - Housing Navigation and Placement Services - Marketing and Outreach - Sanitation Services Rapid Rehousing - Coordinated Entry Planning and Delivery - Housing Navigation and Placement Services - Move-In Financial Assistance - Rehousing and Supportive Housing Services - Rental Assistance (24 months maximum) - Renter's Insurance Unit Access - Block Leasing - Landlord Engagement - Landlord Incentives - Unit Repair Data Collection - HMIS Training and Technical Assistance Administrative Costs	Acquisition Capacity Building Construction

1. Street Outreach

Oregon Rehousing Initiative funding may be used to pay for Street Outreach services. Street Outreach is a service delivery that targets unsheltered homeless individuals and Households. Street Outreach includes reaching out to people who do not otherwise seek assistance. Street Outreach involves going outside of the agency to connect with individuals and Households where they are located, to build rapport and meaningfully engage with unhoused individuals and families. Street Outreach includes connecting with individuals and Households experiencing homelessness who may be disconnected or alienated from supports and services, and is focused on moving people into permanent housing without preconditions for receiving assistance.

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

Allowable expenses for Street Outreach include, but are not limited to:

- a. Housing navigation and placement services;
- b. Assessing emergent health, behavioral, and mental health needs and connecting and/or referring Participants to these services;
- c. Safety & Comfort Resources such as food, tarps, sleeping bags, clothing, blankets, tents, toiletries, and propane tanks are allowed; however, this must not be the sole strategy for Street Outreach services, and such items must be limited and provided as a means of building rapport with homeless individuals to connect them to shelter, permanent housing options, and additional health and human services;
- d. Marketing and outreach costs, inclusive of written materials, translation, and interpretation services; and
- e. Sanitation services such as portable bathrooms, hand washing, shower stations, and waste management.

To confirm the eligibility of Street Outreach expenses not listed above, please [email the ORI grant administrator](#).

2. Rapid Rehousing

Oregon Rehousing Initiative funds are primarily intended to support Rapid Rehousing activities. Rapid Rehousing activities are those services that enable Households to obtain permanent housing when they are currently homeless. Rapid Rehousing is used when a Household's housing status is literally homeless (category 1), homeless under federal statutes (category 3), or when a Household is fleeing or attempting to flee a Domestic Violence situation (category 4).

Allowable expenses for Rapid Rehousing include, but are not limited to:

- a. Housing costs such as rental assistance (up to 24 months per Household) and security deposit (inclusive of first, last, pet rent, and if accepted by landlord as an incentive, forward rent), renter's insurance, and late fees;
- b. Utility payments and arrearages (utilities include water, sewer, garbage, gas, electricity, phone, internet);
- c. Moving costs (van/truck rental) and transportation costs, such as bus/train passes, gas vouchers, Uber/Lift/Cab fares, car repair/insurance;
- d. Housing navigation and case management, including pre-eligibility determination for housing and other needed services;
- e. Education and training in such areas as personal finance and budgeting, job search and access to job training, life skills, and literacy, as well as assistance in completing/submitting applications for other state/federal benefits (SSI/SSDI, TANF, SNAP, Unemployment, etc.);
- f. Crisis intervention/counseling or referrals and/or "warm hand-offs" to counseling, addiction, and mental health services; and
- g. Supportive services such as Program Delivery and Financial Assistance costs.

To confirm the eligibility of Rapid Rehousing expenses not listed above, [please email the ORI grant administrator](#).

3. Unit Access

Oregon Rehousing Initiative funding can be used to support Unit Access. Unit Access may include expenses tied to landlord engagement, Block Leasing initiatives, and other expenses connected to the access of available units in a region. Unit Acquisition and Construction are ineligible uses of ORI funds.

Block Leasing is a type of lease that gives the lessee the right to control and sublease the property during the lease, while the owner retains the legal title.

For example, a housing authority or service provider would be the lessee, allowing them to sublease the property to Participants. An example of an eligible expense would be those related to a property manager on-site as part of the Block Leasing agreement.

Allowable expenses for Unit Access include, but are not limited to:

- a. Landlord engagement and landlord incentives, including Participant/landlord mediation services;
- b. Block Leasing initiatives, including providing on-site property management; and
- c. Unit Repair:
 - 1. Maintenance of a unit only. For further guidance on what activities fall under Maintenance, please refer to Appendix A;
 - 2. Renovation, Rehabilitation, or Conversion of a unit is allowable under the following circumstances:
 - a. Prior approval is obtained from OHCS program staff before beginning any Renovation, Rehabilitation, or Conversion activity. Requests for approval must be made using the ORI Request Form for Renovation, Rehabilitation, or Repairs. For access to this form, [please email the ORI grant administrator](#); and
 - b. Renovation, Rehabilitation, or Conversion activity is necessary to:
 - i. Bring a unit up to habitability standards as outlined in General Program Requirements Section 5 above; or bring the unit up to ADA standards for a Participant-based need; and
 - c. A Habitability Report is completed for the Renovation, Rehabilitation, or Conversion activities that documents all necessary habitability and/or ADA improvements prior to work beginning and, after work is completed, documents that all the identified habitability and/or ADA issues in the unit have been addressed. A copy of the Habitability Report must be maintained in the Participant's file and made available to OHCS upon request during monitoring;
 - 3. Paying for damages caused by the Participant is allowable under the following circumstances:
 - a. Prior approval is obtained from OHCS. Requests can be submitted through the ORI Request Form for Renovation, Rehabilitation, or Repairs. For access to the form, [please email the ORI grant administrator](#); and

- b. Participants placed in housing during the time period that qualifies them to use the Housing Choice Landlord Guarantee Program (HCLGP) may be directed by OHCS to utilize that resource if it is determined that they are eligible for the HCLGP program.¹

For further guidance on Rehabilitation vs Maintenance activities, please reference Appendix A. For questions and technical assistance on Unit Repair, or to confirm eligibility of Unit Access expenses not listed above, [please email the ORI grant administrator](#).

Grantees that receive ORI 360 behavioral health pilot funding are exempt from the requirement to obtain OHCS approval prior to the Renovation, Rehabilitation or Conversion of a unit, and the restriction of Renovation, Rehabilitation or Conversion only being allowable to bring a unit up to ADA standards or habitability standards. Requirements for performing Renovation, Rehabilitation, or Conversion on a unit with ORI 360 behavioral health pilot funding will be set out in the Grantee's grant agreement. This exemption only applies to activities performed under the ORI 360 behavioral pilot scope.

4. Data Collection

Oregon Rehousing Initiative funding can be used to support data system-related costs necessary to collect and report Participant services, Participant demographic data, performance outcomes, and other reporting requirements.

Allowable expenses for data collection include, but are not limited to:

- a. HMIS user licenses;
- b. Equipment or network systems upgrade to meet HMIS needs;
- c. HMIS training and technical assistance support for partner organizations to maximize effective use of the HMIS system for data entry, reporting, and program management. Such as:
 - 1. Staffing to conduct training related to HMIS;
 - 2. Develop and manage program-specific workflows and onboarding training related to HMIS;
 - 3. Develop and manage data quality plans related to HMIS; and
 - 4. Provide end-user support, ad hoc reporting support, and troubleshooting related to HMIS.

¹ Note that submitting a request to cover damages to both HCLGP and ORI is considered a duplication of benefits and is unallowable under the ORI program.

To confirm the eligibility of data collection expenses not listed above, [please email the ORI grant administrator](#).

5. Administration

Grantees may use up to 15% of the total Oregon Rehousing Initiative regional allocation for administrative costs, including administrative costs for the Subrecipient organization with whom the Grantee contracts. There is an expectation that administrative funds will be shared with Subrecipients commensurate with the services provided through the program by the Subrecipient.

Administrative costs are those that benefit the organization as a whole and cannot be attributed to a particular program. All amounts billed to administration must be supported by actual costs.

Allowable expenses for administration include, but are not limited to:

- a. Senior executive management personnel salaries and benefits (unless they are directly involved in Program operations), administrative staff travel costs;
- b. General services such as accounting, budget development, personnel, contracting, marketing, agency audit, and agency insurance;
- c. Board expenses (excluding meals);
- d. Planning and implementation of Multi Agency Coordination (MAC) Group or Local Planning Group (LPG) infrastructure;
- e. Organization-wide membership fees and dues specific to the rehousing program;
- f. General 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
- g. Equipment rental/purchase, insurance, utilities, and information technology costs that are not specific to the rehousing program but relate to the administration of the program as a whole.

To confirm eligibility of administration expenses not listed above, [please email the ORI grant administrator](#).

Allowable Program Components and Expenditures

1. Transitional Living Programs for Youth & Young Adults

Oregon Rehousing Initiative funding can be used for Transitional Living Programs for youth and young adults, ages 14 to 24. Transitional Living Programs facilitate a homeless youth or young adult's transition to permanent housing and are offered to Participants for no more than 24 months. Transitional Living Programs are designed to provide interim support to help a Participant successfully move to and maintain permanent housing. Transitional Living Programs will require program Participants to sign either a lease or an Occupancy Agreement. Transitional Living Programs are not the same as transitional shelter, which requires no lease/occupancy agreement.

A. Oxford Housing Models and Alcohol & Drug Free Community Housing

Oxford Housing models and Alcohol & Drug Free Community (ADFC) program models are deemed as eligible forms of housing, in situations when individuals have a choice between this type of program and others. Participants must be provided with an individual lease or occupancy agreement and must have access to kitchen facilities and a bathroom. Oxford Housing models and ADFC housing must align with Oregon State Law regarding programs of recovery per ORS 90.243.

B. RV Housing Options

If the Household is not seeking traditional permanent housing, and their housing preference is an RV, it can be counted as permanent housing if the RV meets the requirements set out in this section. To be considered permanent housing, an RV must be in livable condition, hooked up to sewer, water, and electricity, and be placed on at least month-to-month leased or owned land. The RV must also comply with any local codes for habitable structures and for RV safety and sanitation.

2. Supportive Services

ORI Rapid Rehousing funds may be used to provide supportive services that help individuals achieve a greater level of housing security. Supportive services are those necessary to provide a Household with safe and stable housing, and costs under this category must be reasonable and sufficient to

stabilize the Household. **Programs are encouraged to utilize strategies to braid or blend funding streams to increase supportive services opportunities.** For unique instances, please [email the ORI grant administrator](#).

Eligible supportive services expenses may include, but are not limited to, the following examples:

A. Program Delivery Expenses:

1. Staffing program expenses related to wraparound case management that supports housing placement and housing retention services;
 - a. The concept of “wraparound” programming is used to describe any program that is flexible, Household- or person-oriented, and comprehensive. In a “wraparound” approach, a team of professionals (e.g., educators, mental health workers, social workers, etc.) and key figures in an individual/Household’s life (e.g., family, community members, religious leaders, etc.) create, implement, and monitor a plan of support;
 - b. A wraparound approach is designed for people/families with complex needs and is a form of collaborative community case management that should reflect the needs of the Household, rather than the availability of services.
2. Housing Search Assistance. As part of supportive services, Grantee/Subrecipients may provide housing search assistance that may include:
 - a. Assistance in identifying eligible units, including physically accessible units as needed;
 - b. Outreach to owners of potentially eligible units;
 - c. Transportation assistance to potential units;
 - d. Assistance for families and individuals with rental applications, rental agreements, and other paperwork;
 - e. Advocacy directly, as needed, with landlords on behalf of the families and individuals; and
 - f. Other help to expedite the rehousing process for families and individuals.

B. Financial Assistance Expenses:

1. Work supports (e.g., training costs; transportation assistance – bus tokens, ride sharing, auto repair; childcare or eldercare; clothing to support employment needs; tech to support Wi-Fi access; phone costs). The purpose of the work supports is to allow the Household to stabilize by addressing costs or expenses in other areas that are a barrier to housing stability;
2. Basic life skills information/counseling on money management, use of credit, housekeeping, proper nutrition/meal preparation, and access to health care (e.g., doctors, medication, and mental and behavioral health services); and
3. Furniture and household goods to support a Household moving to a new home (e.g., bedroom furniture, bedding, pots, pans, kitchen utensils, bath towels).

Financial Assistance refers to expenses for which a Participant receives a direct good or service covered by the expense. **All other available internal/external programs should be leveraged and exhausted before utilizing ORI funding for these purposes. Documentation of attempts to leverage other programs/resources prior to utilizing funding in this manner must be kept in the Participant file.**

Grantees that receive ORI 360 behavioral health pilot funding are exempt from the requirement to leverage internal/external resources prior to utilizing ORI; this exemption only applies to activities performed under the ORI 360 behavioral pilot scope.

3. Landlord Partnerships

A. Housing Choice Landlord Guarantee Program

Landlords who had ORI Participants that were placed into housing between Jan. 10, 2023 and Jan. 10, 2026, and have a Rehousing Certification on file for the Household with OHCS, may be eligible to receive reimbursement for damages to a unit in which the tenant deposit was not sufficient to cover the costs. To learn more about what damages a landlord can request reimbursement for, please [visit the Housing Choice Landlord Guarantee Program Dashboard](#).

No new certifications are being accepted after Jan. 10, 2026. For further information about this opportunity and to confirm whether a

Rehousing Certification was submitted for a Household, [please contact the HCLGP grant administrator](#).

B. Landlord Incentives

Landlord participation rates affect the overall availability of rental options, as well as their location and quality, thus shaping the extent to which Households can access the intended benefits of rehousing assistance. Landlord incentives can be a valuable tool to increase or maintain participation rates. Eligible landlord incentives include:

1. **Landlord bonuses:** One-time payments to landlords, usually at the point of lease-up or renewal. May also include referral bonuses for landlords who refer others who end up leasing to program Participants;
2. **Funds to overcome rental barriers:** Funds to cover costs such as holding fees, security deposits, application fees, rental insurance, and credit or background checks;
3. **On-call support:** Case manager or other staff to quickly respond to concerns or assist with urgent situations;
4. **Mediation services:** Support resolving landlord-tenant or tenant-tenant disagreements; and
5. **Property repair services:** Maintenance support or repair work, with OHCS prior approval, in the event a unit is damaged during the lease term or when a tenant moves out.

To confirm the eligibility of landlord incentives not listed above, please [email the ORI grant administrator](#).

4. Relocation (Portability)

A. Rehousing Outside of Grantee or Subrecipient Region

If a Participant Household prefers to be rehoused in a different geographic area, the Grantee or Subrecipient should use all available options to accommodate when possible. Unit selection in rehousing should be centered around Participant choice. Centering Participant choice is an important element in successful housing placement and sustaining that housing. Equally important is that the supportive services that work concurrently with rehousing are available and accessible to the Participant. It is possible that a provider may have budgetary, staffing capacity, or other limitations that restrict adequate provision of

services and may limit where the Household may be rehoused. If a Household wants to move to a location where the current provider cannot serve them, the provider must make a reasonable effort to connect the Household with another provider in the area where they want to relocate.

B. Costs Associated with Reunification

There may be instances in which individuals or Households prefer housing placement within communities of support rather than engaging with more traditional service provision. Participant choice should be centered in these instances. Paying for transportation costs (such as bus tickets for rehousing in another county or state) is an available Street Outreach tool but is only eligible for use under the Street Outreach funding category, unless an alternative plan is approved in writing by OHCS. Households assisted in this manner would not be counted towards the community's rehousing goal unless approved by OHCS. Long-term success of reunification can be difficult to track, and, in contrast to traditional rehousing efforts, supportive services may not be available. Reunification should be used as part of a comprehensive housing problem-solving conversation that aligns with Participant choice, and not as a stand-alone program offering.

5. Repeat Housing Placements

In instances where a Household that is successfully rehoused later becomes unhoused, that housing placement would still be counted towards the Grantee's rehousing goal associated with ORI.

If a Household is rehoused for a second time through the ORI program, that second placement *may* be counted towards the Grantee's rehousing goal under certain circumstances. If a Household no longer receives a rental subsidy and successfully exits the Rapid Rehousing project, then later falls back into homelessness before becoming housed a second time, the second rehousing will count towards the overall rehousing goal.

If a Household is still engaged in the ORI program and is at risk of, or loses, housing while enrolled, OHCS recommends that attempts be made to locate another acceptable unit to prevent any period of homelessness. A Household that is rehoused into a different housing placement and that did not enter back into homelessness should have one consistent enrollment in

HMIS to maintain an accurate housing history. A Household that relocated housing placements will not be counted as a second “rehoused” Household because the Household was not homeless at the time of moving into the new housing placement.

OHCS recognizes that, despite best efforts, rehousing providers cannot prevent or mitigate every situation that could result in a Household falling back into homelessness. If attempts to locate another acceptable unit are unsuccessful, and the Household enters a period of homelessness, they should be exited from the Rapid Rehousing program in HMIS with an exit destination that matches their new living situation. If a Household becomes eligible for rehousing through ORI again, a new enrollment in ORI within HMIS, with a new housing move-in date, is required for the Household to be counted a second time towards the overall rehousing goal.

Please note, it is allowable to expend funds to move an already housed ORI Household from their original placement into a new unit after initial rehousing, so long as they were originally rehoused through ORI, they did not become unhoused between the original (or subsequent) rehousing and the move, and they are still within the maximum of 24 months of rent assistance for that Household. Moving this Household into a new unit would be considered a continuation of the Household's rehousing support and not a new placement; therefore, it should not be counted as a new rehousing placement in HMIS.

Data, Submission, and Reporting Requirements

1. Data Entry

Except for Domestic Violence victims and other specific circumstances approved by OHCS in advance, Grantees will be required to enter data into an approved Homeless Management Information System (HMIS) for all persons assisted through the Oregon Rehousing Initiative. Grantees and their Subrecipients are required to enter reliable, valid, and accurate Participant and service data into the HMIS being operated in their geographic Continuum of Care (CoC). *HMIS Data and Technical Standards* have been established by the U.S. Department of Housing and Urban Development (HUD). Grantees and their Subrecipients must adhere to their CoC's HMIS data quality plan.

Violence Against Women Act (VAWA) and the Family Violence Prevention and Services Act (FVPSA) contain strong, legally codified confidentiality provisions that limit HUD-defined Victim Service Providers (VSPs) from sharing, disclosing, or revealing victims' personally identifying information (PII), including entering it into shared databases like HMIS. To protect Participants, VSPs must enter required Participant-level data into a database that is comparable to and complies with all HUD HMIS requirements, as further described below.

Grantees and any Subrecipients defined as HUD VSPs are still subject to ORI reporting requirements even if using a comparable database; however, no PII will be shared, only aggregate counts.

Grantee must participate in OHCS' required data reporting process, complying with all information requests and reporting deadlines.

2. Data Timeliness

Timely and accurate data entry is critical to ensuring meaningful data analysis and reporting. For all project types, Grantees and any Subrecipients must enter data within 72 hours of initial evaluation and providing services or sooner, depending on local CoC HMIS policies.

3. Comparable Database

Victim service providers are prohibited from entering data in HMIS; however, they are required to maintain comparable databases that provide aggregate information and data consistent with HMIS data collection requirements. Comparable databases must have the following characteristics:

- a. The victim service provider controls who can access and see Participant information;
- b. The database is carefully controlled by the victim service provider;
- c. The database meets the standards for security, data quality, and privacy of the HMIS within the CoC;
- d. The comparable database may use more stringent standards than the CoC's HMIS;
- e. The database complies with all HUD-required technical specifications and data fields listed in HMIS;
- f. The database is programmed to collect data with the most up-to-date HMIS data standards, which can be found on the HUD exchange website;

- g. The database is 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
- h. Data fields must have the ability to be modified and customized by the victim service provider to benefit Participants.

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

4. Program Reporting Requirements

Grantees must meet OHCS deadlines set out in the grant agreement for submitting data, budgets, and reports. The Grantee must refer to their grant agreement for all other reporting requirements. Grantees must submit complete and accurate materials requested by OHCS by the deadline provided by OHCS in the grant agreement and in the format required. Any submission that is incomplete or received after the deadline will be considered late and out of compliance with requirements by OHCS. Grantees may request an extension of the reporting deadline. An extension must be approved in writing by OHCS, and such approval may be granted or withheld in OHCS' sole discretion. [Requests must be emailed to OHCS before the submission deadline.](#)

Grantees may be requested to provide additional reports, and Grantees must attend meetings with OHCS, as reasonably requested by OHCS.

5. Performance Measures

Grantees shall be responsible for tracking and reporting on performance measures as outlined in their grant agreements.

Financial Management

1. Supplanting of Funds/Programs

Oregon Rehousing Initiative funds may not be used to supplant other funds available for the same purpose.

2. Advanced Requests for Funds

Grantees may request and be paid in advance, provided they maintain or demonstrate a willingness to maintain both written procedures that minimize the time elapsed between the transfer of funds and disbursement, and financial management systems that meet the standards for fund control and accountability. Advance payments to a Grantee must be limited to the minimum amounts needed and timed to meet the Grantee's actual, immediate cash requirements for carrying out the purpose of the approved program or project. The timing and amount of advance payments must be as close as is administratively feasible to the actual disbursements by the Grantee for direct program or project costs and the proportionate share of any allowable indirect costs.

An advance can be requested using the field labeled “Projected” in OPUS on the Agency Grant Request (AGR) screen. If OHCS provides an advance disbursement of grant funds, the Grantee must submit supporting expenditure documentation for the advanced grant funds. It is important to note that to have an advance for funds request considered, the Grantee must have all prior pending expenditures submitted for reimbursement for ORI.

The need for an advance must be justified by a short comment in the AGR “Comment” field, or the comment can advise to “see attached”. The comment and/or the attachment will need to provide enough detail to justify the request and demonstrate the impact on the Grantee's operations and cash flow. Supporting documentation may include, but is not limited to, a spreadsheet with supporting detail or a Word document outlining the need for the advance. An advance may be requested in accordance with the terms of the grant agreement, including for the following reasons:

- a. Wait list total, or expected demand, plus additional funds to serve Participants over a specified period. Analysis must be provided on how any additional funds were calculated, the expected number of Households, and the amount per Household;

- b. Amount needed to provide to one or more Subrecipients, with an analysis of the calculated amount (projected volume or demand for Subrecipient, number of Households, etc.), while factoring in timelines for invoicing and processing;
- c. Funds to meet the Grantee's upcoming payroll; or
- d. Participant intake completed in another system, or applications in process of approval.

OHCS is mindful of Grantees' operational needs and cash flow as they work to deliver critical programs. If there are additional questions or if a Grantee would like to talk through the operational and cash flow needs, Grantees may [email the ORI grant administrator](#)

Grantees shall refer to their grant agreements for any other additional conditions around Advanced Requests for Funds.

3. Use of OPUS

OPUS is a web-based centralized data system designed to meet business processing needs. Grantees must use OPUS for all payment requests and submission of supporting documents. Grantee staff must complete training before being authorized to use the fiscal operations program of OPUS. The Fiscal Grant Specialist at OHCS can provide training. OHCS maintains an OPUS manual and OPUS help desk. View the OPUS user manual from the landing page, under the help tab, after logging into OPUS. [Email the OPUS help desk with questions.](#)

4. Request for Funding Documentation

Grantee and Subrecipients 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 the Grantee submits an agency grant request (AGR)/request for funds (RFF) in OPUS, they are required to upload documentation of the costs for which they are requesting payment. Any AGR/RFF submitted without accompanying documentation or with insufficient documentation will be returned to the Grantee with instructions to provide additional information. Grantee is required to submit AGR/RFFs at least quarterly to appropriately expend their funds within their identified spending targets. An AGR/RFF can be denied/voided if

documentation is insufficient, if unallowable costs are included, or if submitted after the grant period has closed.

5. Budget Change Requests

Any changes to the budget approved by OHCS at the time of grant execution require OHCS approval. The Grantee must [submit a budget change request form electronically](#). Budget change requests must be approved by OHCS program staff. At the sole discretion of OHCS, additional information can be required for a budget change request, in the form and format required by OHCS.

For funds that are advanced, any budget change needs must still receive OHCS program staff approval and be kept on file by the Grantee and OHCS. Grantee must [email requests for approval to the ORI grant administrator](#).

6. Funds Spend Down

The Grantee is expected to fully obligate or expend grant funds during the grant's performance period, and Grantee must meet spending targets identified in their time-bound expenditure plan (TBEP). OHCS will review the Grantee's grant spending in accordance with the Grantee's grant agreement and OHCS policy. The Grantee must fully expend funds or have filed a final agency grant status (AGS)/financial status report (FSR) for a previous fiscal period to roll funds, if allowable, and prior to OHCS approving funds in a current fiscal period.

In the event that Grantee spending is below the minimum standard spending target or the time-bound expenditure plan, OHCS may pursue any or all of the remedies available under the grant agreement, this program guidance, or applicable administrative rules. Please review the grant agreement for more information.

Any funds left unexpended 60 calendar days following the end of the funding period are subject to recapture/deallocation by OHCS.

Definitions

Acquisition: Action taken to acquire a building for the purpose of permanent or transitional housing.

Block Leasing: A type of lease that gives the lessee the right to control and sublease multiple units within the same property during the lease, while the owner retains the legal title. For example, a housing authority or service provider would be the lessee, allowing them to sublease the property to Participants. An example of an eligible expense would be those related to a property manager on-site as part of the Block Leasing agreement.

Code of Conduct Agreements: Agreements that may be required by some Oxford Housing Models and Alcohol & Drug Free Community Housing models. A Code of Conduct Agreement can require that Participants adhere to the housing facility's rules and expectations of behavior and may or may not be required to be signed by the Participant. Code of Conduct Agreements are not the same as Occupancy/Lease/Rental Agreements.

Construction: Has the definition provided in ORS 456.515.

Conversion: An activity that materially adds to the value of an existing structure, appreciably prolongs its useful life, or adapts it to new uses.

Coordinated Entry: A centralized or coordinated process designed to coordinate Participant intake assessment and provision of referrals. A centralized or coordinated assessment system covers the geographic area, is easily accessed by individuals and families seeking housing or services, is well-advertised, and includes a comprehensive and standardized assessment tool.

Culturally Responsive Organization: An entity that provides services to a cultural community and has the following characteristics: comprehensively addresses power relationships throughout the organization by methods that include addressing conflicts and dynamics of inclusion and exclusion; has relationships with and is responsive to communities that the organization serves; hires, promotes, trains and supports staff who are culturally and linguistically diverse in ways that reflect the communities that the organization serves; provides Culturally Responsive Services; and has adopted governance structures, policies and cultural norms to hold its leadership and staff accountable and to continue improvements.

Culturally Responsive Services: Services that: are adapted to maximize the respect of and relevance to the beliefs, practices, culture and linguistic needs of the diverse Participant populations and communities being served; have the capacity to respond to the issues of diverse communities; and assures competent language access and incorporates diverse cultural approaches, strengths, perspectives, experiences, frames of reference, values, norms and performance styles of Participants and communities to make services and programs more welcoming, accessible, appropriate, and effective for all eligible and intended recipients.

Domestic Violence: Activities including, but not limited to, dating violence, sexual assault, stalking, attempting to cause, or intentionally, knowingly, or recklessly causing or placing another in fear of imminent serious physical injury or emotional, mental, or verbal abuse, and using coercive or controlling behavior. This does not include other criminal acts such as violence perpetrated by a stranger, neighbor, acquaintance, or friend, unless those persons are family members, intimate partners, or Household members.

Financial Assistance: Activities that provide for a Participant's need by purchasing a good or service from the community outside the organization's Program Delivery model and separate from any formal partnership

Grantee: The entity receiving funds and entering into a grant agreement with Oregon Housing and Community Services.

Household: An individual living alone, a family with or without children, or a group of individuals who are living together as one economic unit.

HMIS: Homeless Management Information System, as defined in 24 CFR 576.2.

Occupancy/Lease/Rental Agreements: Agreements used for temporary or permanent housing, which include transitional housing. These are not the same as a Code of Conduct Agreement.

Participant: A Household that is receiving OHCS-funded services under the Oregon Rehousing Initiative program.

Priority Population: Persons that the Grantee/Subrecipient has determined as having the greatest need and will receive services first.

Program Delivery: The activities to operate and deliver services directly to Participants or through formal partners.

Progressive Engagement: An approach to helping Households end their homelessness as rapidly as possible, despite barriers, with individually tailored financial and support resources. Through Progressive Engagement, assistance may be provided to any Household entering the homelessness system at a level needed by that Household. In many cases, a Household may need a small amount of assistance to stabilize, while others may need more resources and tailored assistance.

Rapid Rehousing: Services provided to enable Households to obtain permanent housing when they are currently homeless. Rapid Rehousing is used when a Household's housing status is literally homeless (category 1), homeless under other federal statutes (category 3), or when a Household is fleeing or attempting to flee a Domestic Violence situation (category 4).

Rehabilitation: Action taken to return a property to a useful state by means of repair, modification, or alteration. Bringing a property to the point where it is usable, safe, comfortable, hygienic, etc., but not necessarily bringing it back to its previous state or improving the property.

Renovation: The process carried out to upgrade an existing structure and to improve performance by either altering the scope of the structure, providing additional facilities, or improving existing facilities. Improving the property.

Maintenance: Actions taken to keep a building at a certain level of integrity, or to restore a structure to such a condition that it can be effectively used for its designated purpose. Actions that make improvements that will raise the building to a higher level of integrity or allow the building to be used for a new activity are not considered Maintenance. Maintenance involves bringing a property back to its original condition or taking action to keep a property at its current condition.

Stand-Alone Policy: A written policy that includes all the requirements for such a policy and is either its own separate document or it is included in a larger document, such as a policy and procedures handbook, that can easily be separated from the larger document for the purpose of approval and review by OHCS.

Street Outreach: A service delivery that targets unsheltered homeless individuals and Households. Street Outreach includes reaching out to people who do not otherwise seek assistance. Street Outreach involves going outside of the agency to connect with individuals and Households where they are located, to build

rapport and meaningfully engage with unhoused individuals and families. Street Outreach includes connecting with individuals and Households experiencing homelessness who may be disconnected or alienated from supports and services, and is focused on moving people into permanent housing without preconditions for receiving assistance.

Subrecipient: Entity that, by contract with the Grantee, provides assistance payments and/or services and may receive funding directly from the Grantee. Through its agreement with Grantee, Subrecipient must comply with all requirements for ORI. Subrecipients include Grantee's subcontractors, contractors, or vendors, and any subcontractors, contractors, vendors, or subrecipients of a subcontractor, contractor, vendor, or subrecipient.

Target Population: Persons a Grantee or Subrecipient wishes to reach out to who are under-represented in their service population.

Transitional Living Programs: Programs that facilitate a homeless youth or young adult's transition to permanent housing and are offered to Participants for no more than 24 months. Transitional Living Programs are designed to provide interim support to successfully move a Participant to, and help them maintain, permanent housing. Transitional Living Programs will require ORI Participants to sign either a lease or an occupancy agreement. Transitional Living Programs are not the same as transitional shelter, which requires no lease/occupancy agreement.

Unit Access: Those activities and services performed to enable a housing unit to become an accessible housing placement for an unhoused Household. These activities and services increase the availability of housing units within a region.

Unit Repair: Activities and services that bring a unit up to habitability standards or to be ADA-compliant to meet a specific Household's need, including, but not limited to, Maintenance, Rehabilitation, Renovation, and Conversion of a unit..

Appendix A- Maintenance/Rehabilitation Activities

Examples of Maintenance Activities vs. Rehabilitation Activities

Feature or System	Maintenance Activities	Rehabilitation Activities
Windows and Doors	• Washing windows • Fixing a broken windowpane(s) or damaged entry door • Replacing a broken door lock • Replacing an entry door if it would restore security to unit • Replacing a single severely damaged window to match • Switch out of damaged window screens	• Retrofitting of inefficient/outdated windows • Replacement of doors for safety or ADA or other non-damaged purposes. • Adding storm windows or storm doors
Interior Walls and Ceilings	• Patching or mending cracked plaster • Patching or fixing holes or cracks in drywall • Replacing stained ceiling tiles • Painting	• Installation of new drywall or paneling • Installation of a new ceiling
Flooring	• Carpet repair/cleaning • Vinyl repair	• Installation of new flooring
Circulation	• In-kind replacement of broken stair treads or balusters	• Rebuilding stairs or constructing new stairs • Installation of a new access ramp

Feature or System	Maintenance Activities	Rehabilitation Activities
Kitchen	• Repairing or replacing parts of necessary appliances (refrigerator, stove, microwave) • Repair of cabinets	• Complete or substantial kitchen remodel
Bathroom	• Installation of grab bars • Repair of toilet/tub/shower • Repair of damaged cabinet/mirror	• Complete or substantial bathroom remodel
Electrical/Lighting Electrical/Lighting	• Changing light bulbs • Replacing a malfunctioning light fixture, electrical switch or outlet	• Major rewiring of a unit • Installation of a new electrical service • Replacing or moving an electrical panel
Plumbing	• Fixing plumbing leaks • Repair of water heater	• Installation of new plumbing system • New water or sewer connection
Life Safety	• Servicing smoke, fire, and CO2 detectors • Installation of the above detectors	• Making substantial physical changes to a building to comply with fire and life safety codes • Installing a fire suppression system
Pest Infestation	• Pest inspection/treatment	