

Housing Stability Council

MEETING MATERIALS PACKET



Creekside Apartments
Central Point Oregon

September 4, 2020
9:00 a.m. – 1:30 p.m.
Oregon Housing & Community Services
Conference Phone

Council Members:
 Claire Hall, Chair
 Sarah DeVries
 Sami Jo Difuntorum
 Barbara Higinbotham
 Anna Geller
 Mary Li
 Gerardo F. Sandoval, PhD
 Charles Wilhoite

AGENDA

September 4, 2020 9:00 a.m.-1:30p.m.
 Oregon Housing and Community Services
 725 Summer St NE, Salem OR 97301

Call In Mtg Only

Call-In: 1-253-215-8782 or Toll Free: 1-888-788-0099
 Meeting ID: 955 2359 5676 Password: 402403



TIME	TOPIC	SWHP Priority	ACTION
9:00	Meeting Called to Order <i>Roll Call</i>		Call Roll
9:05	Public Comment		Discussion
9:15	Meeting Minutes Approval: Aug 07, 2020		Decision
9:25	Homeownership Division (pg. 06) <i>Emese Perfecto, Director, Homeownership Division</i> <ul style="list-style-type: none"> Oregon Bond Loan Approvals: <i>Kim Freeman, Single Family Program Manager</i> MH Replacement Endorsement: <i>Chelsea Catto, Manufactured Housing Senior Program Analyst</i> 		Decision
10:00	Affordable Rental Housing Division (pg. 14) <i>Julie Cody, Director, Affordable Rental Housing</i> <p>Multifamily Housing Transactions</p> <ul style="list-style-type: none"> Orchards / Solhavn: <i>Rick Abrego, Production Analyst; Casey Baumann, Production Manager</i> Deer Creek Manufactured Home Park Preservation: <i>Edward Brown, Program Analyst</i> COVID Response Fund – Portfolio Operating Support: <i>Natasha Detweiler-Daby, Assistant Director ARH Planning and Policy</i> PSH Framework: <i>Amy Cole, State Development Resources Manager; Natasha Detweiler-Daby, Assistant Director ARH Planning and Policy</i> Additional LIFT Awards: <i>Amy Cole, State Development Resources Manager</i> 		Decision
11:45	Housing Stabilization Division (pg. 88) <i>Andrea Bell, Director, Housing Stabilization</i> <ul style="list-style-type: none"> ESG Briefing: <i>Andrea Bell, Director of Housing Stabilization, Sam Kenney, Senior Operations and Policy Analyst</i> RMR Update: <i>Andrea Bell, Director of Housing Stabilization, Brizna Garcia, Program Analyst, Vicki Massey, Rental Assistance Programs Coordinator</i> 		Briefing
12:45	Report of the Director: <ul style="list-style-type: none"> Legislative Update 		Update
1:15	Report of the Chair		Briefing
1:30	Meeting Adjourned		

All times listed on this agenda are approximate and subject to change. Agenda items may also be taken out of order and addressed at different times than listed. The agenda may be amended by the Council at the time of the meeting.

Council Members:

Claire Hall, Chair
Sarah DeVries
Sami Jo Difuntorum
Barbara Higinbotham
Anna Geller
Mary Li
Gerardo F. Sandoval, PhD
Charles Wilhoite

AGENDA

September 4, 2020 9:00 a.m.-1:30p.m.
Oregon Housing and Community Services
725 Summer St NE, Salem OR 97301

Call In Mtg Only

Call-In: 1-253-215-8782 or Toll Free: 1-888-788-0099
Meeting ID: 955 2359 5676 Password: 402403



The Housing Stability Council helps to lead OHCS to meet the housing and services needs of low- and moderate-income Oregonians. The Housing Stability Council works to establish and support OHCS' strategic direction, foster constructive partnerships across the state, set policy and issue funding decisions, and overall lend their unique expertise to the policy and program development of the agency.

The 2019-2023 Statewide Housing Plan outlines six policy priorities that focuses OHCS' investments to ensure all Oregonians have the opportunity to pursue prosperity and live from poverty.

For more information about the Housing Stability Council or the Statewide Housing Plan, please visit Oregon Housing and Community Services online at <https://www.oregon.gov/ohcs/OSHC/Pages/index.aspx>

Statewide Housing Plan Policy Priorities



Equity & Racial Justice



Homelessness



Permanent Supportive Housing



Affordable Rental Housing



Homeownership



Rural Communities

All times listed on this agenda are approximate and subject to change. Agenda items may also be taken out of order and addressed at different times than listed. The agenda may be amended by the Council at the time of the meeting.

Council Members:
 Chair: Clair Hall
 Sarah DeVries
 Sami Jo Difuntorum
 Barbara Higinbotham
 Anna Geller
 Mary Li
 Gerardo F. Sandoval, PhD
 Charles Wilhoite



August 07, 2020

Oregon Housing Stability Council Meeting Minutes

Chair Hall called the meeting to order at approximately 9:00 am, and then asked for the roll call:

Agenda Item: Roll Call

Councilmember	Present	Excused	Absent	By phone
Devries, Sarah	X			
Difuntorum, Sami Jo	X			
Chair Hall, Claire	X			
Higinbotham, Barb	X			
Geller, Anna	X			
Li, Mary	X			
Sandoval, Gerardo	X			
Wilhoite, Charles		X		

**With at least six members in attendance, we have reached a quorum for voting purposes*

Public Comment:

Alison McIntosh, Neighborhood Partnerships and Oregon Housing Alliance: supporting the request that OHCS seek a change in statute and welcome continued dialogue around this change.

Emily Reiman, DevNW: support for statute changes and for opening the door for culturally specific and BIPOC organizations to serve communities that are most impacted.

Alan Evans, Helping Hands Reentry Outreach Centers: support the statute change to increase access to resources and support.

Zeenia Junkeer, Oregon Health Equity Alliance: support for the statute change in ways that are culturally affirming and responsive in order to serve individuals who are unable to access resources through existing structures.

Norma Ramirez-Gonzalez, Eastern Oregon Health Equity Alliance and Euvalcree: Support the proposed changes, communities that they work with they don't feel comfortable due to language access and circumstances where they don't want to share information, or they don't get a response from the agency. Important to fund Community Based Organizations.

Commissioner Thompson, Clatsop County: Important that every voice is heard including people who have not had access and appreciate the emphasis from Governor Brown to address disproportionate impacts.

Quinn Erickson, All Care Health Tribal Liaison: Express frustration in trying to access food, healthcare and housing. Tribal communities are hit even more due to historic lack of funding.

Maria Elena, Farmworker Housing Development Corporation: Culturally specific organizations need more flexible assistance, and consider flexible scoring systems for these organizations to achieve equity.

Steven Lewis, Hilltop Ranchito Cooperative: Expressing thanks for the GHAP grant to manage the manufactured home park as a cooperative. 27 families are living in the park, and everyone is paying the same amount. They couldn't do this without support from partner agencies and the GHAP grant from OHCS.

Michelle Glass, Regional Health Equity Coalition of Southern Oregon: Support for the changes for flexibility to allow access to resources for communities of color, and acknowledgement that systemic racism that has impacted trust.

Travis Phillips, Catholic Charities of Oregon, representing Housing Oregon: Commenting on the Affordable Rental Housing COVID Response Funds draft framework. The program must be centered to focus the resources on households most in need. Statewide Housing Plan: Equity and Racial Justice and Rural Communities Priorities must be included in the framework.

Approval of Meeting Minutes for July 10, 2020:

Chair Hall introduced meeting minutes for council approval and called to motion. Councilmember Li moved to accept the minutes, and Councilmember Geller seconded the motion. Chair Hall then called for the vote.

Agenda Item: Meeting Minutes Approval

Motion: Move to approve the Oregon Housing Stability Council Meeting Minutes from July 10, 2020

	Motion	Yes	No	Abstain	Excused
Sarah Devries				X	
Sami Jo Difuntorum				X	
Chair Claire Hall		X			
Barb Higinbotham				X	
Anna Geller		X			
Mary Li	2	X			
Gerardo Sandoval	1	X			
Charles Wilhoite					X

**With five members voting to approve, we have met the quorum requirements to pass this item.*

Report of the Director:

Director Salazar provided an overview in preparation for the Special Legislative Session that will focus on the State's budget crisis. Director Salazar highlighted the resources allocated to OHCS from Coronavirus Relief Fund, and the Emergency Solutions Grant (ESG) allocation from HUD was larger than expected. Current planning is that approx. \$7M would be directly allocated to Community Action

Agencies to get funds out quickly. Director Salazar said we will work with HSC to create a vision and deployment approach for the remainder of approximately \$42M to serve communities of color.

Director Salazar introduced Sup Thanasombat, Senior Advisor for Strategic Planning and Business Operations to give an overview of outcomes from the first fiscal year of implementing the Statewide Housing Plan. (Found in the packet on page 10.)

Homeownership Division (pg. 13)

Emese Perfecto, Director, Homeownership Division

Manufactured Home Replacement Program: *Chelsea Catto, Manufactured Housing Senior Program Analyst*

More information and audio recording can be found [here](#).

Affordable Rental Housing Division (pg. 18)

Julie Cody, Director, Affordable Rental Housing

More information and audio recording can be found [here](#).

Multifamily Housing Transactions

- **Hilltop Ranchito Manufactured Home Park:** *Alan Borges, Production Analyst; Casey Baumann, Production Manager*

MOTION: Move to approve MDPP GHAP funds in an amount up to and not to exceed \$1,260,000 to Hilltop Ranchito Cooperative for purchase of Mobile Home Park, subject to the borrower meeting OHCS and NOAH’s underwriting and closing criteria, documentation.

	Motion	Yes	No	Abstain	Excused
Sarah Devries	1	X			
Sami Jo Difuntorum		X			
Chair Claire Hall		X			
Barb Higinbotham	2	X			
Anna Geller		X			
Mary Li		X			
Gerardo Sandoval		X			
Charles Wilhoite					X

**With five members voting to approve, we have met the quorum requirements to pass this item.*

- **Stillwater Crossing Apartments:** *Tyler Young, Lead Production Analyst; Casey Baumann, Production Manager*

MOTION: Move to approve Pass-Through Revenue Bond in an amount up to and not to exceed \$35,000,000 to Stillwater Housing Associates Limited Partnership for the new construction of the project known as Stillwater Crossing Apartments, subject to the borrower meeting OHCS and Citi

Community Capital’s underwriting and closing criteria, documentation satisfactory to legal counsel and State Treasurer approval of the bond sale.

	Motion	Yes	No	Abstain	Excused
Sarah Devries		X			
Sami Jo Difuntorum		X			
Chair Claire Hall		X			
Barb Higinbotham		X			
Anna Geller	1	X			
Mary Li		X			
Gerardo Sandoval	2	X			
Charles Wilhoite					X

**With five members voting to approve, we have met the quorum requirements to pass this item.*

- **NOFA Funding Awards (Preservation, HOME only, 9% LIHTC):** *Tai Dunson-Strane, Senior LIHTC Program Manager, Roberto Franco, Assistant Director Development Resources and Production; Natasha Detweiler-Daby, Assistant Director Planning and Policy*

MOTION:

Approve the funding reservation of the following resources:

- Nyssa Court in Nyssa, \$1,150,000 in Gap (GHAP/HDGP)
- Ankeny Woods in Portland, \$3,800,000 in Gap (GHAP/HDGP), and \$68,460 OMEP funds
- Garden Grove in Grants Pass, \$5,000,000 in Gap (GHAP/HDGP) funds, and \$126,455 OMEP funds
- Grand Apartments in Roseburg, \$200,000 in Gap (GHAP/HDGP), and \$1,435,000 in HOME or Gap funds
- Hillside Terrace Apartments in Coquille, \$200,000 in Gap (GHAP/HDGP), \$2,200,000 in HOME or Gap, and \$122,973 OMEP funds
- Freedom Square II in White City, \$200,000 in Gap (GHAP/HDGP), \$900,000 in HOME or Gap funds
- Chelsea Gardens in Warrenton, \$200,000 in Gap (GHAP/HDGP), \$1,977,436 in HOME or Gap, and \$136,960 OMEP funds
- Ontario Affordable Housing in Ontario, \$200,000 in Gap (GHAP/HDGP), and \$3,482,202 in HOME or Gap funds
- Canal Commons 2 in Bend, \$200,000 in Gap (GHAP/HDGP), \$2,100,000 in HOME or Gap, and \$218,459 OMEP funds
- Spring Garden Apartment in Rogue River, \$200,000 in Gap (GHAP/HDGP), \$600,000 in HOME or Gap, and \$138,268 in OMEP funds

East West Preservation Portfolio, \$199,633 in Gap (GHAP/HDGP), \$932,761 in HOME or Gap, and \$50,609 OMEP funds

	Motion	Yes	No	Abstain	Excused
Sarah Devries		X			
Sami Jo Difuntorum	2	X			
Chair Claire Hall		X			
Barb Higinbotham	1	X			

Anna Geller		X			
Mary Li		X			
Gerardo Sandoval		X			
Charles Wilhoite					X

**With five members voting to approve, we have met the quorum requirements to pass this item.*

Permanent Supportive Housing, Year-Two Resources, Introduction: *Amy Cole, State Development Resources Manager; Natasha Detweiler-Daby, Assistant Director Planning and Policy*

Affordable Rental Housing COVID Response Fund, Introduction: *Natasha Detweiler-Daby, Assistant Director Planning and Policy*

Housing Stabilization Division (pg. 89)

Andrea Bell, Director, Housing Stabilization

More information and audio recording can be found [here](#).

CSBG State Plan: *Leeann Marx, CSBG Program Coordinator*

LIHEAP State Plan: *Tim Zimmer, Assistant Director of Energy Services, David Kaufman, Energy Assistance Coordinator*

HMIS Budget Note/HB 5512: *Hunter Belgard, HMIS Administrator, Sam Kenney, Senior Operations and Policy Analyst*

Deputy Directors Office (pg. 99)

Caleb Yant, Deputy Director, Oregon Housing and Community Services

More information and audio recording can be found [here](#).

HB2003: Methodology Review and Discussion: *Caleb Yant, Deputy Director*

Report of the Chair

No report was given.

Adjourned



**OREGON HOUSING and
COMMUNITY SERVICES**

725 SUMMER STREET NE, SUITE B | SALEM, OR 97301
503-986-2000 | www.oregon.gov/OHCS

Date: 9/4/2020

To: Housing Stability Council

From: Kim Freeman, Homeownership
Section Manager

Re: Residential Loan Program

Recommended Motion: Housing Stability Council approves the Consent Calendar

Background: State statutes require the Housing Stability Council to establish a single-family loan threshold for loans to be review and approved prior to purchase. The current threshold for single-family loans includes all loans equal to or greater than 95% of the applicable area program purchase price limit.

Considerations:

1. The loan(s) under consideration is greater than or equal to 95% of the applicable area program purchase.
2. Staff has reviewed all of the following loan files and concluded that the borrowers and properties meet all relevant program guidelines for the Residential Loan Program. All required documents have been properly executed, received, and the loans have been approved for purchase. In addition to being approved by staff, the loan files have been underwritten by the applicable lenders and are insured by either FHA (FB), Rural Development (RG), or Uninsured (U) with a loan-to-value of 80% or less.

	Loan Amount	Purchase Price Limit	95% of Purchase Price Limit or Max	Monthly Mortgage Payment PITI
Loan #1	\$291,919	\$294,600 Non-Targeted Linn	\$279,870	\$1,580.29



Loan #2	\$295,454	\$296,145 Non-Targeted Jackson	\$281,338	\$1,504.76
Loan #3	\$296,145	\$296,145 Non-Targeted Jackson	\$281,338	\$1,589.03
Loan #4	\$344,444	\$360,067 Targeted Josephine	\$342,064	\$1,609.49



1

			<u>Lender</u>	LOAN DEPOT			
			<u>Purchase Price</u>	289,000.00	<u>Note Amount</u>		291,919.00
			<u>Cost Limit</u>	294,600.00	<u>Principal Balance</u>		\$ 291,919
<u>Property City</u>	TANGENT	OR	<u>Appr. Value</u>	\$ 289,000			
			<u>Year Built</u>	2007			
<u>Hshld. Income</u>	\$ 80,191		<u>Living Area (Sq. Ft.)</u>	1,378	<u>Loan-to-Value</u>		101%
<u>Income Limit</u>	\$ 89,355		<u>Lot Size (Sq. Ft.)</u>	10,454	<u>Insurance Type</u>		RG
<u>% of Income Limit</u>	89.74%		<u>Cost per Sq. Ft.</u>	\$ 209.72	<u>Rate</u>		3.250%
<u>Prior Ownership Yes (Y) or No (N)</u>	N		<u>New (N) or Existing (E)</u>	E			
			<u>Construction Style</u>	Two Story			

2

			<u>Lender</u>	GUILD MORTGAGE COMPANY			
			<u>Purchase Price</u>	292,500.00	<u>Note Amount</u>		295,454.00
			<u>Cost Limit</u>	296,145.00	<u>Principal Balance</u>		\$ 295,454
<u>Property City</u>	EAGLE POINT	OR	<u>Appr. Value</u>	\$ 292,500			
			<u>Year Built</u>	1974			
<u>Hshld. Income</u>	\$ 68,614		<u>Living Area (Sq. Ft.)</u>	1,392	<u>Loan-to-Value</u>		101%
<u>Income Limit</u>	\$ 89,355		<u>Lot Size (Sq. Ft.)</u>	8,712	<u>Insurance Type</u>		RG
<u>% of Income Limit</u>	76.79%		<u>Cost per Sq. Ft.</u>	\$ 210.13	<u>Rate</u>		2.500%
<u>Prior Ownership Yes (Y) or No (N)</u>	N		<u>New (N) or Existing (E)</u>	E			
			<u>Construction Style</u>	One Story			

3

			<u>Lender</u>	GUILD MORTGAGE COMPANY			
			<u>Purchase Price</u>	296,145.00	<u>Note Amount</u>		296,145.00
			<u>Cost Limit</u>	296,145.00	<u>Principal Balance</u>		\$ 296,145
<u>Property City</u>	MEDFORD	OR	<u>Appr. Value</u>	\$ 301,000			
			<u>Year Built</u>	1987			
<u>Hshld. Income</u>	\$ 55,256		<u>Living Area (Sq. Ft.)</u>	1,510	<u>Loan-to-Value</u>		100%
<u>Income Limit</u>	\$ 77,700		<u>Lot Size (Sq. Ft.)</u>	7,841	<u>Insurance Type</u>		VA
<u>% of Income Limit</u>	71.11%		<u>Cost per Sq. Ft.</u>	\$ 196.12	<u>Rate</u>		3.250%
<u>Prior Ownership Yes (Y) or No (N)</u>	N		<u>New (N) or Existing (E)</u>	E			
			<u>Construction Style</u>	One Story			

4

			<u>Lender</u>	GUILD MORTGAGE COMPANY			
			<u>Purchase Price</u>	341,000.00	<u>Note Amount</u>		344,444.00
			<u>Cost Limit</u>	360,067.00	<u>Principal Balance</u>		\$ 344,444
<u>Property City</u>	GRANTS PASS	OR	<u>Appr. Value</u>	\$ 341,000			
			<u>Year Built</u>	1976			
<u>Hshld. Income</u>	\$ 71,529		<u>Living Area (Sq. Ft.)</u>	1,296	<u>Loan-to-Value</u>		101%
<u>Income Limit</u>	\$ 93,240		<u>Lot Size (Sq. Ft.)</u>	30,928	<u>Insurance Type</u>		RG
<u>% of Income Limit</u>	76.71%		<u>Cost per Sq. Ft.</u>	\$ 263.12	<u>Rate</u>		2.500%
<u>Prior Ownership Yes (Y) or No (N)</u>	N		<u>New (N) or Existing (E)</u>	E			
			<u>Construction Style</u>	One Story			



OREGON HOUSING *and*
COMMUNITY SERVICES

725 SUMMER STREET NE, SUITE B | SALEM, OR 97301
503-986-2000 | www.oregon.gov/OHCS

September 4, 2020

To: Housing Stability Council
Margaret Solle Salazar, Agency Director

From: Chelsea Catto, Manufactured Housing Senior Program Analyst
Emese Perfecto, Director Homeownership

Re: Request for Approval: Manufactured Housing (MH) Decommissioning and Replacement Pilot Program Framework

Motion: Approval of the MH Decommissioning and Replacement Pilot Program framework.

Update:

Homeownership Section staff presented the framework for the MH Decommissioning and Replacement Pilot Program to Housing Stability Council on August 7, 2020. Since that meeting, a final framework was presented to the Programmatic Policy Review Committee (PPRC) on August 10, 2020 and received an endorsement. A public hearing on the adoption of administrative rules took place on August 26, 2020.

At the August 7th meeting, Councilmembers gave feedback on staff questions and the following determinations were made:

- Income limits will not exceed the greater of 100 percent of the statewide or local area median income, in order to cast a wider net for potential borrowers. Since this is a pilot program, staff will reevaluate this limit once the pilot program is complete to determine whether or not it should be lowered. In addition, research staff and the executive team are in discussions about culturally-specific AMIs and how they might be applied in the future.
- The program will not specify an upper limit on the age of the home that would qualify for replacement. We will reevaluate this decision at the end of the pilot program based on lessons learned.
- Decommissioning grants will be prioritized for the safe remediation of dwellings with environmental and public health hazards and risks, including asbestos, lead paint and mold, and for homeowners at or under 100 percent of the statewide or local area median income, whichever is greater. While a nonprofit, resident-owned cooperative, housing authority, local government or state governmental entity that has a controlling



interest in a park are able to access decommissioning grants, any single entity may not have more than five grants open at any given time. Once a qualified homeowner has moved into the space where the decommissioning grant was used, that grant will be considered closed and the entity can apply for another grant, provided funding is still available.

- At the recommendation of PPRC members, staff will continue engagement with culturally-specific organizations throughout the program pilot.

Background:

The 2019 Legislative Session, through HB 2896, provided OHCS with several opportunities to develop new resources to preserve manufactured dwelling parks as affordable, including the allocation of \$2.5 million for OHCS to provide grants to qualified individuals/entities to safely decommission and dispose of inefficient and unsafe manufactured homes, and subordinate loans to qualified individuals to affordably replace these homes.

Subordinate loans are intended to fill a subsidy gap and be layered with existing home replacement resources, including a first position loan, energy incentives, weatherization incentives and the decommissioning grants. Decommissioning grants are intended to facilitate the safe decommissioning and disposal of older manufactured homes (many of which contain hazardous materials), removing them permanently from the market.

Data collected by the DC-based nonprofit Prosperity Now shows that manufactured housing is one of the largest sources of unsubsidized affordable housing in the country. In Oregon, 51% of manufactured housing is affordable, compared to only 25% of all housing. A Prosperity Now study also found that manufactured homeowners tend to spend considerably less of their income on housing than residents of other kinds of homes. Yet, approximately 41% of the manufactured homes in Oregon are more than 40 years old (pre-1980), which poses significant health and safety challenges, particularly for households that tend to have lower median household incomes (\$38,466 for manufactured homeowners compared to \$72,519 for all homeowners).

Pilot Program Development Status:

Staff plan to use an RFP process to contract with an approved lender for the administration of the subordinate loans and decommissioning/disposal grants under this Manufactured Housing Decommissioning and Replacement Pilot Program. This will enable funding resources to be streamlined efficiently into one package in order to provide the borrower with a replacement process that is as straightforward as possible.

Loans and grants will be available to manufactured homeowners statewide who are located on land that they own, or in eligible manufactured dwelling parks – specifically parks that have been permanently preserved by nonprofits, housing authorities or resident-owned



cooperatives, as well as parks on tribal lands, and investor-owned parks, provided that the owner enters into a regulatory agreement with OHCS.

Program development efforts to date include:

- Rulemaking during June and July 2020, utilizing a Rules Advisory Committee made up of community partners. Draft rules are currently under review with the Department of Justice. The public comment closes on August 30, 2020 and the legislative comment period will close on September 22, 2020.
- Establishment of a manufactured housing replacement subcommittee by the Manufactured Housing Advisory Committee to concurrently work on mapping out the replacement process and homeowner experience in order to identify existing expertise and gaps.
- Introduction of the program design to internal review teams (PPRC and Executive Team), as well as external stakeholders. An endorsement from PPRC was received on August 10, 2020.

Loan/Grant Terms:

Anticipated loan terms include:

- No minimum loan amount and maximum loan of \$35,000, or as set by legislation;
- Replacement home must meet energy efficiency standards (NEEM 1.1 and NEEM 2.0 specifications or equivalent);
- 0% interest rate;
- No principal payments required;
- Subordinated to a primary home loan;
- Original loan balance will be reduced incrementally and forgiven completely after 10 years. If the home is sold before the 10 year period is up, the outstanding balance at the time of sale must be repaid upon sale unless the loan is assumed by an income-eligible buyer approved by OHCS or the remaining balance is forgiven early by OHCS due to hardship.
- The loan will be secured by a filed or recorded security interest;
- A program loan may be made to refinance an existing subordinate loan, provided the loan was made for the purpose of a qualified manufactured dwelling replacement and was made after January 1, 2020;
- Unless otherwise directed, the outstanding balance must be repaid upon the borrower's sale, voluntary transfer or relocation of the manufactured dwelling without prior OHCS written consent.

Anticipated grant terms include:

- Grants may not exceed 80 percent of the cost of decommissioning and disposal;



- Grants may be prioritized for the safe remediation of homes with environmental and public health hazards and risks, including asbestos, lead paint and mold;
- Documentation, as outlined in the RFP, confirming proper disposal of the old home is required;
- A qualified individual or entity may apply for and receive a grant without applying for and receiving a subordinate loan.

Eligibility:

Borrower eligibility for replacement loans is as follows:

- The home must be the borrower’s primary residence throughout the term of the loan;
- The home must be located in a manufactured dwelling park that has entered into a regulatory agreement with OHCS, or will be sited on ‘fee simple’ land owned by the borrower;
- Incomes may not exceed the greater of 100 percent of the statewide or local area median income adjusted for household size at the time the loan is approved;
- Homeowners must be able to obtain primary home financing from another source that is acceptable to OHCS; and

Eligibility for decommissioning/disposal grants are as follows:

- An individual who owns a manufactured home sited in a manufactured dwelling park that has entered into a regulatory agreement with OHCS, or on land owned by the individual.
 - a. Incomes may not exceed the greater of 100 percent of the statewide or local area median income adjusted for household size at the time the loan is approved
- A nonprofit, resident-owned cooperative, housing authority, local government or state governmental entity that has a controlling interest in either the manufactured dwelling or the manufactured dwelling park where the home slated for disposal is sited.

Stakeholder Engagement:

OHCS has been a participant in various stakeholder groups dedicated to identifying creative and flexible ways to address manufactured housing preservation in Oregon for a number of years. The funding request through HB 2896 for subordinate loans to replace old and inefficient manufactured homes was initiated and developed by partner organizations.

We are currently working with multiple stakeholders as we develop the pilot. To date, we have:

- Utilized the expertise on the Manufactured Housing Advisory Committee (MHAC) to specifically work on manufactured housing replacements, including the formation of a manufactured housing replacement subcommittee to map the process, as well as



identify the barriers that may prevent manufactured homeowners, including homeowners of color, from being able/willing to replace their homes. The MHAC includes tenants, landlords, and representatives from Business Oregon, the Department of Consumer and Business Services, the Department of Environmental Quality, Umatilla Electric Cooperative, DEV NW, Neighborworks Umpqua, Craft3, Commonworks Consulting, St. Vincent de Paul of Lane County, Network for Oregon Affordable Housing (NOAH), Community in Action, CASA of Oregon, Oregon Office for Community Dispute Resolution, and Portland Community Reinvestment Initiatives (PCRI). The manufactured housing replacement subcommittee also includes external partners such as Energy Trust of Oregon and NeighborImpact who bring additional expertise to the conversation.

- Met with tribal members to discuss manufactured home replacement opportunities in parks on tribal lands, with plans to continue that discussion. In addition, we have begun discussions with culturally specific and culturally responsive organizations to determine whether the program presents unintended barriers for manufactured homeowners of color. Stakeholder engagement will continue over the next few months.

Commitment to Equity and Racial Justice:

Households of color are disproportionately impacted by predatory lending practices. Chattel lending, which is predominantly used when buying a manufactured home, has a reputation for high interest rates and predatory practices. By providing flexible and forgivable financing that augments non-predatory and affordable chattel loans, OHCS and our partners can move the needle towards safe, healthy and sustainable homeownership for those who have traditionally been shut out of the market.

Demographic data for manufactured homeowners statewide exists, however, that data has not been disaggregated to accurately reflect the race and ethnicity of residents in resident-owned and nonprofit-owned parks in Oregon. While the data shows that an overwhelming majority of manufactured homeowners statewide are white (88%), we know anecdotally that of the 25 manufactured housing parks that have been preserved through resident or nonprofit ownership, three of them are home to a majority of Latinx households. Currently, affordable housing partners working in manufactured housing preservation collect limited data on race and ethnicity in preserved parks, which creates a challenge for establishing a baseline for measuring impact.

Approved lenders will be expected to sign a Diversity, Equity, and Inclusion agreement and will be required to include an OHCS-approved survey for borrowers at the end of their loan application materials in order to help us gather data and evaluate impact. We will expect partners who participate in this program to demonstrate efforts to serve BIPOC (Black, Indigenous and People of Color) households and conduct culturally appropriate marketing and outreach to manufactured homeowners in eligible manufactured housing parks. Additionally, we will work with OHCS research staff to identify manufactured dwelling parks located on tribal lands in order to facilitate marketing and outreach.



Date September 4, 2020

To: Housing Stability Council
Margaret Solle Salazar, Executive Director

From: Scott Shaw, Production Analyst
Casey Baumann, Production Manager
Roberto Franco, Assistant Director, Development Resources and Production
Julie V. Cody, Director, Affordable Rental Housing

RE: Orchards Plaza & Solhavn Apartments Preservation

MOTION: Move to approve Pass-Through Revenue Bonds in an amount up to and not to exceed \$9,000,000 to Orchards Solhavn Limited Partnership for the acquisition and rehabilitation of the scattered site project known as Orchards Plaza & Solhavn Apartments Preservation, subject to the borrower meeting OHCS and Chase Bank underwriting and closing criteria, and documentation satisfactory to legal counsel and State Treasurer approval of the bond sale.

MOTION: Move to approve Preservation/GHAP program funds in the amount of \$3,500,000 to Orchards Solhavn Limited Partnership for the acquisition and rehabilitation of the scattered site project known as Orchards Plaza & Solhavn Apartments Preservation, subject to the borrower meeting OHCS and Chase Bank underwriting and closing criteria and documentation satisfactory to legal counsel.

Overview and Location:

Orchards Plaza & Solhavn Apartments Preservation is a rural scattered site acquisition, rehabilitation, and preservation project.

Orchards Plaza is an affordable community for seniors and people with disabilities located in McMinnville, Oregon. Orchards Plaza was constructed in 1980 and contains 60 units, 55 (1) Bedroom and 5 (2) Bedroom units that serve very low-income elderly and disabled McMinnville residents.



Solhavn Apartments is located in Clatskanie, Oregon. Thirty-five miles east of Astoria on Highway 30 and sixty miles northwest of Portland. Solhavn Apartments was constructed in 1974/1976 and contains 57 units, 24 (1) Bedroom and 33 (2) Bedroom units that serve very low-income individuals and families in Clatskanie, Oregon.



Funding History:

In October of 2006, Orchards Plaza and Solhavn Apartments received Low Income Housing Tax Credits (LIHTC) to purchase the property. The original LIHTC restrictions will expire on January 2035.

Current Funding Context:

The sponsor applied for noncompetitive 4% LIHTC resources and Conduit Bonds in October 2019, the pre-application was accepted. The 4% LIHTC and Conduit Bond application was accepted in December of 2019. In order to address project-funding needs, the sponsor applied for, and received a reservation of \$3,500,000 in GHAP through a competitive NOFA. On June 30th 2020, Finance Committee approved \$516,471 in annual 4% LIHTC allocation and \$1,800,000 in OAHTC's.

The GHAP funds are a competitive program made available to the OHCS portfolio projects. The funding is intended to preserve housing at risk of converting to market rate rents due to expiring federal contract or maturing or pre-payment eligible federal loans with at least 25 percent of the units are covered by federal project based assistance.

Project Sponsor and Partnership:

Guardian Real Estate Services LLC (GRES), and its affiliates, is locally owned and operated in Portland, Oregon with over 40 years' experience in real estate development, investment and property management.

GRES has worked with Oregon Housing and Community Services and several nonprofit partners to bring diverse housing and service opportunities for populations facing disparities. In

partnership with Native American Youth and Family Center, the NAYA Generations development provides 40 affordable housing units and wraparound resident services programs provided by Cornerstone Community Housing and NAYA Generations Community Outreach. Guardian also developed Bridge Meadows Senior Housing and Bridge Meadows Beaverton, providing affordable intergenerational housing for seniors and youth.

Guardian's knowledge and experience in development, construction and asset preservation as well as existing relationship with financial and business partners allows Guardian Real Estate Services to deliver on their commitment to preserving affordable housing in the Pacific Northwest.

General Contractor:

J.R. Johnson, is the general contractor for both Orchards Plaza and Solhavn. Locally owned, J.R. Johnson employees are 9% female and 40% of the executive team is female. Total workforce is 58% made up of racially minority team members.

J.R. Johnson has in-depth experience at Solhavn Apartments and Orchards Plaza, as a mitigation/restoration company and also general contractor. J.R. Johnson provides a full spectrum of repairs and rehab services, including in-house certified teams for asbestos abatement, biohazard cleanup (including containing and decontaminating airborne pathogens), painting, and roofing. Approximately 50% of the rehab work planned for Orchards Plaza and Solhavn is self-performed by J.R. Johnson.

MWESB focus:

This sponsor has adopted a goal of 25% MWESB participation; contractor J.R. Johnson reached out to a wide pool of COBID or MWESB sub trade contractors and solicited bids on the following scope: interior cabinetry, interior painting, MEP, site work, railings, siding, etc. Several of the contractors from the sub-contractor pool qualify as COBID or MWESB contractors.

J.R. Johnson will be partnering with West-Meyer, a MWESB certified subcontractor, for the aluminum railing for the Orchard Plaza and Solhavn Apartments projects. For siding subcontracts, J.R. Johnson will be partnering with Premium Exterior's and Right Angle Construction, which both firms are minority owned business although not MWESB certified. JR Johnson will be advertising and hiring locally in Clatskanie and McMinnville for participation in the rehab of both properties.

Management Agent:

Guardian Management LLC attributes its' success to the diversity of its workforce of 400 plus employees. The diversity in ethnicity, family, language, national origin, physical and mental

ability, religion, gender identity or expression, socio-economic status, sexual orientation and veteran status gives its corporate culture vibrancy and vision to drive its success. Guardian Management reports that 26.5% of employees self-identify as a person of color and 56% of the staff is female.

To increase workforce diversity, Guardian attends and hold job fairs in local communities, and partners with community organizations, such as EasterSeals and Goodwill Job Connection, to present job and career opportunities. Besides providing one-on-one mentoring programs, community college scholarships, paid training programs throughout the year, Guardian has an annual Leadership Conference for professional development of all team members.

Guardian's leadership is also committed to supporting youth education. Guardian has played an active role in a college preparatory education program that grants primarily minority and lower-income high school student's access to high quality education and post-secondary studies. The company supports and participates in De La Salle's North Catholic High School Corporate Work Study Program (CWSP), by employing two students each year. The goal of CWSP is to "develop tomorrow's community leaders by making high-quality education accessible to motivated young people in a learning environment that values cultural, spiritual, and ethnic diversity."

For emerging businesses, Guardian encourages vendors to participate in its Net Vendor program and waives the annual application fee. As part of the Net Vendor enrollment process, vendors can distinguish themselves as a MWESB business or employer of adults with disabilities. As an example, Guardian partners with MV Advancements, which employs adults experiencing disabilities, to provide cleaning and light maintenance services at several Guardian-managed properties. MV Advancements volunteer program provides hard and soft skill training, job coaching, and employee matching services for individuals. At Orchards Plaza, MV Advancements has been providing cleaning services since 2017.

Both properties utilize and market accordingly with the Affirmative Fair Housing Marketing Plans. The properties have a waiting list and continues to add more prospects regularly to the list through word of mouth of the community and the outreach done in accordance with the Affirmative Fair Housing Marketing Plans. At no cost to potential renters, translation services are available.

Resident Services:

Guardian Management partners with several local community organizations to provide resident services for the residents of Orchards Plaza. Meals on Wheels has a bus stop in front of Orchards Plaza, where meals are delivered to residents. During the Summer, McMinnville Yamhill County Gleaners provides fresh local produces for residents.

Guardian also partners with Northwest Senior & Disabled Services, which provides services for seniors and adults with disabilities, which includes Medicaid, Medicare, and SHIBA, and resources for physical and mental health.

New garden beds are included in the rehabilitation plans for Orchards Plaza. This Fall, Orchards Plaza will be enrolling in Oregon State University (OSU) Extension Services Master Gardener Program. Yamhill County Master Gardener Association provide volunteers to provide onsite gardening workshops.

Solhavn's resident services are in conjunction with area services agencies to help residents obtain the services they need. Although in the beginning stages of planning, Guardian will be collaborating with Community Action Team to provide a monthly educational program for residents, which will focus on community resources, education, mind and body health, and life skills. Guardian will provide free lunch boxes.

Solhavn has 40 children (under 18) living on site. The children will have the opportunity to meet the general contractor and learn about construction and building industry during the rehab. For the two apartment units that will be improved to ADA standards, JR Johnson will be providing hard hat lessons on basic safety, tool operation, and other skills.

Solhavn's new community manager is committed to providing meaningful resident services at Solhavn. During the rehab, Guardian will be sending out a resident services survey, so that they can identify appropriate resources and services. Since Solhavn has no community space, Guardian will work with local businesses, such as the Clatskanie River Inn and Farmhouse Coffee, which are in walking distance, to host resident services programs.

Site staff works in conjunction with area agencies to help residents get the services they need, including access to food, help with rent and utilities, and access to health services. A binder of resident services is maintained in the management office and is reviewed regularly by supervisory staff to ensure the information is accurate and current. Community Manager conducts annual needs assessment regarding livability issues and each household is contacted for input.

REHAB DETAILS/FEATURES:

Orchards Plaza – a single building, low rise, 60 units, 55 (1) bedroom and 5 (2) bedroom, with elevator. 55 parking spaces at a ratio of 0.9/unit

- Rehabilitation cost per unit is \$53,167 (\$89 per square foot)
- Rehabilitation will include:
 - Exterior
 - Replacement of siding, underlying sheathing and trim.
 - Replacement of damaged wall framing, and insulation as well as add rigid insulation.
 - Repair of gutters, downspouts, fascia, soffits, as well as caulking and flashing doors and windows.

- Replacement of windows and sliding doors.
- Repair and recoat the parking lot
- Rehabilitation of ADA parking spaces and access.
- Interior
 - Replacement of baseboard heat with energy efficient wall mounted cadet style heaters.
 - Replacement of appliances, water heaters and bathroom fans with energy star rated equipment as needed.
 - Replace all common area carpet, tile and trim as well as repainting common areas.

Solhavn Apartments – consists of nine low rise two story buildings, which contains 57 units, 24 (1) bedroom, 33 (2) bedrooms. 86 parking spaces at a ratio of 1.5/unit

- Rehabilitation cost per unit is \$107,480 (\$180 per square foot)
- Rehabilitation will include:
 - Exterior:
 - Replacement of siding, windows, exterior doors, sliding doors and trim.
 - Replacement of stair treads, stringers, handrails, decking and entry framing.
 - Replacement and repair of gutters, downspouts, fascia, soffits, as well as caulking and flashing doors and windows.
 - Repainting the complete exterior as well as trim.
 - Replacement of play area and structure.
 - Rehabilitation of ADA parking spaces and access.
 - Interior:
 - Replace all interior doors, hardware, trim and light fixtures with energy efficient models.
 - Replace all interior flooring with vinyl plank in living areas, with carpet in bedrooms.
 - Replace all plumbing fixtures with low flow water saver models.
 - Replace all countertops, cabinet door and drawer fronts.
 - Install new kitchen hoods and bathroom fans complete with humidistats.
 - Replacement of all non-energy star appliances with new energy efficient models.
 - Repaint the complete interior.

Policy Priorities: The project meets four of its key OHCS policy priorities as outlined in the Statewide Housing Plan.

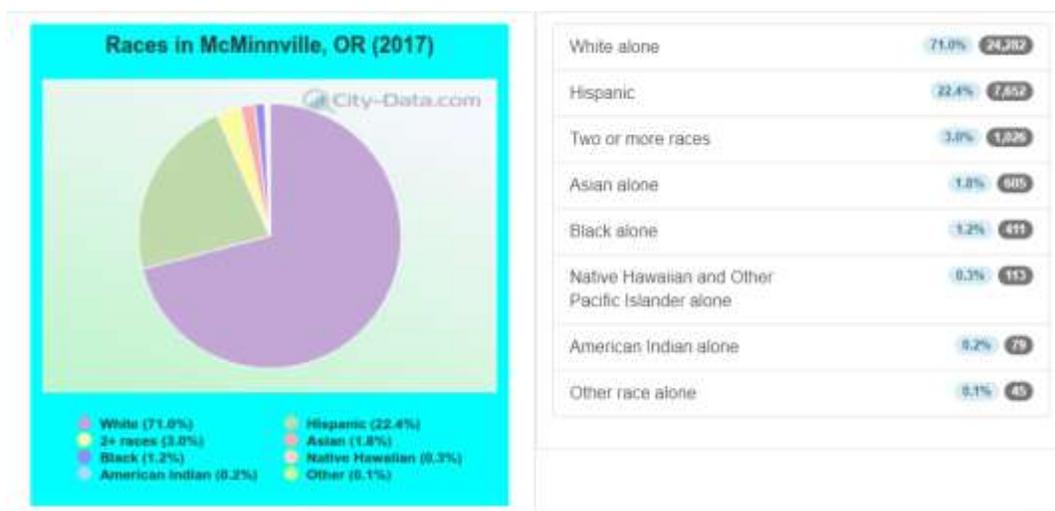
- **Equity and Racial Justice Priority:**

- **Community Demographics:** Below we will review the detailed demographics of the community and high-level information for each of these project locations. This information is used to develop Affirmative Fair Housing Marketing strategies that ensure when there is an available unit in these existing building that the opportunity is appropriately marketed to those least likely to access it.

- **Orchards Plaza** is a rehabilitation project located in the city of McMinnville. As of 2017, there were 34,347 residents in the city of McMinnville. The population density is 3,189 per sq. mi, which is 6,986% higher than the Oregon average and 3,420% higher than the national average. The median age in McMinnville is 35, which is approximately 10% lower than the Oregon average of 39.

In McMinnville, 58% of the population over 15 years of age are married, 79% speak English and 18% speak Spanish. 50% of McMinnville residents were born in Oregon, 35% were born out of state, 1% were born outside of the United States and 14% were foreign born. The racial makeup of the city was approximately 71% White, 1.2% African American, .021% Native American, 1.8% Asian, .03% Pacific Islander, and 4% from two or more races. Hispanic or Latino of any race were about 22% of the population.

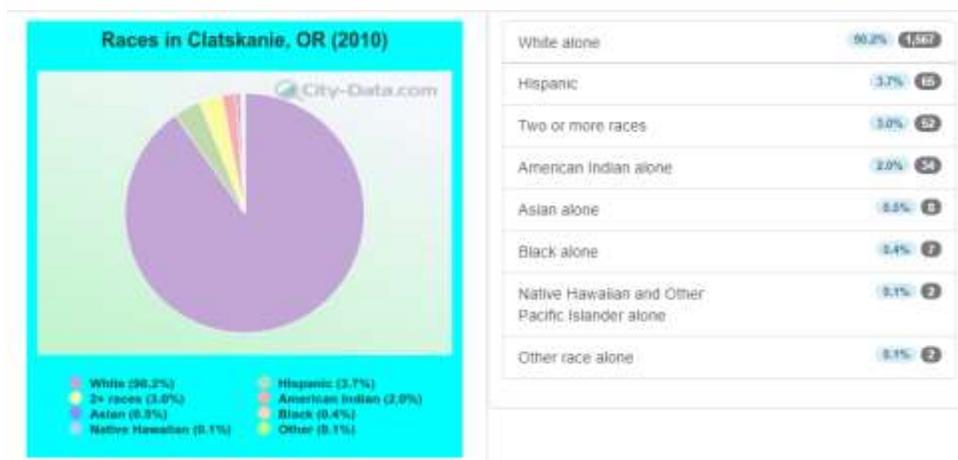
Of the 60 units in the Orchards Plaza project nearly half of the units have single female heads of household, 65% have disabled members, 46% have members over age 62, and approximately 5% are headed by persons of color.



- Solhavn Apartments** is a rehabilitation project located in the city of Clatskanie, with a population of 1,815. There are 760 households in the city. The racial makeup of the city is approximately 71% White, Hispanic or Latino of any race were about 22%, 1.2% African American, .021% Native American, 1.8% Asian, .03% Pacific Islander, and 4% from two or more races. Clatskanie, OR, Population in 2017 1,815 (0% urban, 100% rural). Population change since 2000: +18.8%.

According to 2017 data, the most numerous races are: White alone (1,737 residents), Hispanic (171 residents), and Asian alone (3 residents). 94.6% of Clatskanie residents speak English at home. 2.2% of Clatskanie, OR residents are foreign-born (1.1% born in Latin America, 0.7% born in North America, 0.2% born in Europe, 0.2% born in Asia), which is 351.8% less than the foreign-born rate of 9.9% across the entire state of Oregon.

Of the 57 households in the Solhavn site there are 78% have single female heads of household, 22 units include disabled members, 8% of the units are members over age 62, and nearly 10% of the units are headed by a person of color.



- Affirmative Fair Housing Marketing Strategies:** The project utilizes and markets accordingly with the Affirmative Fair Housing Marketing Plan insuring that the least likely to apply is aware of available rental units. The project has a waiting list and continues to add more prospects in accordance with the Affirmative Fair Housing Marketing Plan.
- Resident Services:** Though resident services are not an allowable expense for RD, the development team has reached out to community partners to provide stability, self-sufficiency and improved quality of life as well as culturally specific services. Site staff works in conjunction with area agencies to help residents get the services they

need. A binder of available resident services and contact information will be maintained in the management office and will be reviewed regularly by supervisory staff to ensure the information is accurate and current. Community Manager conducts annual needs assessment regarding livability issues and each household is contacted for input.

- **Contracting, Diversity, Equity & Inclusion:** Guardian is committed to a Supplier Diversity Initiative encouraging businesses with certified diversity status to provide products and services direct to Guardian. Guardian aims to provide opportunities for small-businesses as well as minority-owned, women-owned, and other historically disadvantaged businesses to supply high quality, competitively priced goods and services required by Guardian and its clients. It's stated goal for this project is 25% MWESB participation.

- **Homelessness Priority:** Both Orchards Plaza and Solhavn Apartments operate with a total of 110 USDA- Rural Development (RD) project-based vouchers; this rent assistance allows those with little to no income to live in the units.

- **Permanent Supportive Housing Priority: N/A**

- **Affordable Rental Housing Priority:** Both Orchard Plaza and Solhavn Apartments rehabilitates and preserves 117 units of Affordable Rental Housing.

- **Homeownership Priority: N/A**

- **Rural Communities Priority:** Both McMinnville and Clatskanie counties are designated rural areas and operate with 110 Rural Development (RD) project-based vouchers.

Risks and Mitigating Factors:

This development conforms to all OHCS underwriting standards. The primary risk is with the current unknown environment relating to COVID-19 and whether it will affect the construction period or delay any material deliveries necessary for the project. Enough contingency was built into the budget to mitigate delays.

The pages that follow will provide more technical details on the proposed project.

Project Detail: Orchards Plaza & Solhavn Apartments Preservation

Project Sponsor: Guardian Real Estate Services LLC

Property: Orchards Plaza: 1310 NE 27th Street, McMinnville, OR 97128
Solhavn Apartments: 500 SW Bel Aire Dr., Clatskanie OR 97016

Owner: Orchards Solhavn Limited Partnership

Description: Orchards Plaza & Solhavn Preservation is a rural scattered site acquisition/rehabilitation project. Orchards Plaza, built in 1980, is 60 units in one building and 3 stories in McMinnville targeted mainly to seniors. Solhavn, in Clatskanie, built in 1974, is 57 units in nine two-story buildings targeted to families.

Affordability:

FUNDING SOURCE	# OF UNITS	% INCOME	% RENTS	# OF YEARS
LIHTC/Bond	117	60	60	30
GHAP	24	80	80	60
OAHTC	117	80	80	20

Target Population: Seniors and Families at or below 60% MFI.

Environmental Review: Phase I environmental reviews show no existing environmental concerns and do not require a Phase II for either property.

Finance Committee Approval: OHCS Finance Committee Reviewed and Approved this Project to be Recommended to the OHCS Director and the Housing Stability Council on June 30, 2020.

Summary: Orchards Plaza was constructed in 1980 and contains 60 units, 54 (1) Bedroom and 6 (2) Bedroom units that serve very low-income elderly and disabled residents in McMinnville, Oregon. Solhavn was constructed in 1974/1976 and contains 57 units, 24 (1) Bedroom and 33 (2) Bedroom units that serve very low-income individuals and families in Clatskanie, Oregon. The scope of work for the rehabilitation of subject property includes major

system(s) replacement. This project will utilize 4% low income housing tax credits (LIHTC) to generate equity as well as GHAP Funds.

Financing Structure:

Design Consultant: J2 Building Consultants Inc.
Construction Lender: Chase, Community Development Real Estate
Permanent Lender: Chase, Community Development Real Estate
General Contractor: J2 Building Consultants Inc.
Equity Investor: CREA

SOURCES:		USES:	
OHCS Sources:			
Tax Exempt Bonds (Long Term)	\$6,512,000		
Tax Exempt Bonds (Short Term)	\$2,488,000	Acquisition	\$4,086,484
Short Term Use of Bonds	(\$2,488,000)	Construction	\$9,316,465
4% LIHTC Equity	\$4,669,797	Development	\$4,802,118
GHAP Funds	\$3,500,000		
Non-OHCS Sources:			
Deferred Developer Fee	\$565,735		
USDA Transfer Loan-Solhavn	\$519,274		
USDA Transfer Loan-Orchards	\$609,261		
Guardian RE Cash Flow Loan	\$1,150,000		
Seller Note	\$679,000		

TOTAL Sources and Uses: \$ 18,205,067

Bond Structure:

The total tax-exempt conduit bond amount is \$9,000,000, of which \$2,488,000 will be short-term, used for the acquisition and rehabilitation.

Orchards Plaza Scope of Work:

The proposed rehabilitation for includes:

- Removal and reinstallation of exterior doors and windows, waterproofing openings.
- Full elevator modernization.
- Exterior building structural panel sheathing with fire resistive sheathing.
- Replace cladding with new fiber cement siding, insulation and rain screen system.
- Isolated roof repairs will include improving the roof eave and rake connections.

- Attic ventilation brought up to code.
- New stem vents exhaust fans.
- Perform a general roof “tune up” to extend the life of the roof.
- Exterior building light fixtures and building signage.
- Deck waterproofing and guardrails.
- New updated energy efficient lighting, new paint, carpet and base trim.
- Existing electric resistant heaters will be replaced with hydraulic “soft-heat” radiant.

Unit Interiors

- 50% of kitchen appliances have reached their useful life expectancy and therefore in need of replacement. Existing electric resistant heaters will be replaced with hydraulic “soft-heat” radiant units, and bathroom exhaust fans will be replaced with whole-house Energy Star exhaust units, which will provide continuous ventilation.

Site Improvements

The project includes installing a new 2” asphalt lift, striping and wheel stops.

Solhavn Apartments Scope of Work:

The proposed rehabilitation for includes:

- Doors and windows will need to be replaced with energy efficient products
- Exterior building structural panel sheathing with fire resistive sheathing.
- Isolated roof repairs to 5 year old roof
- Structural and waterproofing repairs to front entry landings
- Replace cladding with new fiber cement siding, insulation and rain screen system.
- Replacement of deck guardrails, stairs and handrails to be code compliant.
- Attic ventilation will be brought up to code.
- New stem vents exhaust fans (bathrooms, etc.) to fully exhaust this moist air.
- Perform a general roof “tune up” to extend the life of the roof (replaced in 2011).
- Exterior building light fixtures and building signage.
- Deck waterproofing and guardrails.
- All common areas within the existing building will receive new updated energy efficient lighting, new paint, carpet and base trim.
- Existing electric resistant heaters will be replaced with hydraulic “soft-heat” radiant

Apartment interior work includes:

- Replacement of original interior doors, hardware, countertops, cabinet drawer/door faces and floor surfaces.
- Replacement of apartment-plumbing fixtures to include new low-flow sinks, faucets, tub valves, shower, heads, and toilets.

- Replace all lighting fixtures with energy efficient fixtures.
- The project also includes converting two (2) one-bedroom units to be fully accessible.

Site Improvements

- Improve drainage in play area and yard.
- Accessibility improvements, accessible van parking, lot to the office, laundry room, garbage, and new accessible units.
- Replacement of play structure, concrete pad and synthetic padded play surface.

Tenant Relocation:

Orchards Plaza and Solhavn Apartments are existing OHCS portfolio properties. Both sites will have temporary tenant relocation, additionally the sponsor has contracted with DDV Consulting services to assist in the relocation process and the budgets appear reasonable. OHCS AMC and confirmed they will not require prior approval on rent levels as rents are determined by USDA-RD contract.

Affordability Restrictions:

Unit Type	Number of Units	Maximum Percent of Median Family Income As Determined by HUD	Maximum Rent Standards As Determined by HUD
Orchards Plaza			
1 bedroom	54	60%	60 %
2 bedroom	5	60%	60%
Manager (1 bedroom)	1	N/A	N/A
Solhavn Apartments			
1 bedroom	24	60%	60 %
2 bedroom	32	60%	60%
Manager (2 bedroom)	1	N/A	N/A

- 2020 Low Income Housing Tax Credits (LIHTC) @ 60% AMI restrictions

Income:

Orchards Plaza and Solhavn Apartments received 2006 Low Income Housing Tax Credits (LIHTC). The original LIHTC 60% AMI restrictions expire on January 2035.

Orchards Plaza Rural Development (RD) project-based, contract providing rental

assistance to 54-units, contract will be extended 20 years at closing.

Solhavn Apartments operate with Rural Development (RD) project-based contract providing rental assistance to 56-units, contract will be extended 20 years at closing.

Operating Budget:

- All 117 units will be restricted to 60% MFI for 30 years
- Additionally 24 units will be restricted to 80% MFI for 60 years under the GHAP program
- OAHTC lower rents will be retained by the project as it is preservation.
- Annual operation expenses are \$687,058 yielding a per unit expense of \$5,872 PUPA (Per Unit Per Annum).
- Per Unit expenses are above OHCS guidelines of \$4,600-5,200 PUPA, however this is due to Rural Developments requirements for the project, given this, OHCS finds this acceptable.

Debt Service Coverage Ratio (with OAHTC):

- First full year of operations: 1.36
- DCR at year 15: 1.43
- DCR at year 20: 1.42
- DCR at year 30 (w/o OAHTC): 1.21

Location Amenities:

Orchards Plaza is located in the northern part of McMinnville, with McMinnville being a smaller city, estimated population just over 34,000, services are readily close and available. Yamhill County Transit provides transportation services with bus stops just 4 blocks from Orchards Plaza.

Services in Proximity:

- Hospital 3.2 miles (Willamette Valley Medical)
- Elementary 0.4 miles (Grandhaven Elementary)
- Middle School .5 miles (Patton Middle School)
- High School 1.1 miles (McMinnville High School)
- Park 1.0 miles (Wortman Park)
- Police 1.8 miles
- Fire 1.8 miles

Solhavn Apartments is located in the city of Clatskanie, estimated population just over 1,800, services are readily close and available. The Lower Columbia Connector provides transportation services from Astoria to Portland 3 times a day with a bus stop at the Safeway

grocery store across the street.

Services in Proximity:

- Hospital 15.0 miles (Peace Health St. John Medical Center)
- Elementary 0.7 miles (Clatskanie Elementary)
- Middle School 0.4 miles (Clatskanie Middle School)
- High School 0.4 miles (Clatskanie High School)
- Park 0.5 miles (Chris Emerson Park)
- Police 0.4 miles
- Fire 5.7 miles

Resident Services:

Site staff works in conjunction with area agencies to help residents get the services they need. A binder of resident services will be maintained in the management office and will be reviewed regularly by supervisory staff to ensure the information is accurate and current. Community Manager conducts annual needs assessment regarding livability issues and each household is contacted for input.

Amenities: Orchard Plaza

- Community Garden
- Community Lead Activities
- Controlled Access
- Craft Group
- Fitness Center
- Media Room
- Game Room
- Library
- Onsite Laundry Rooms

Amenities: Solhavn Apartments

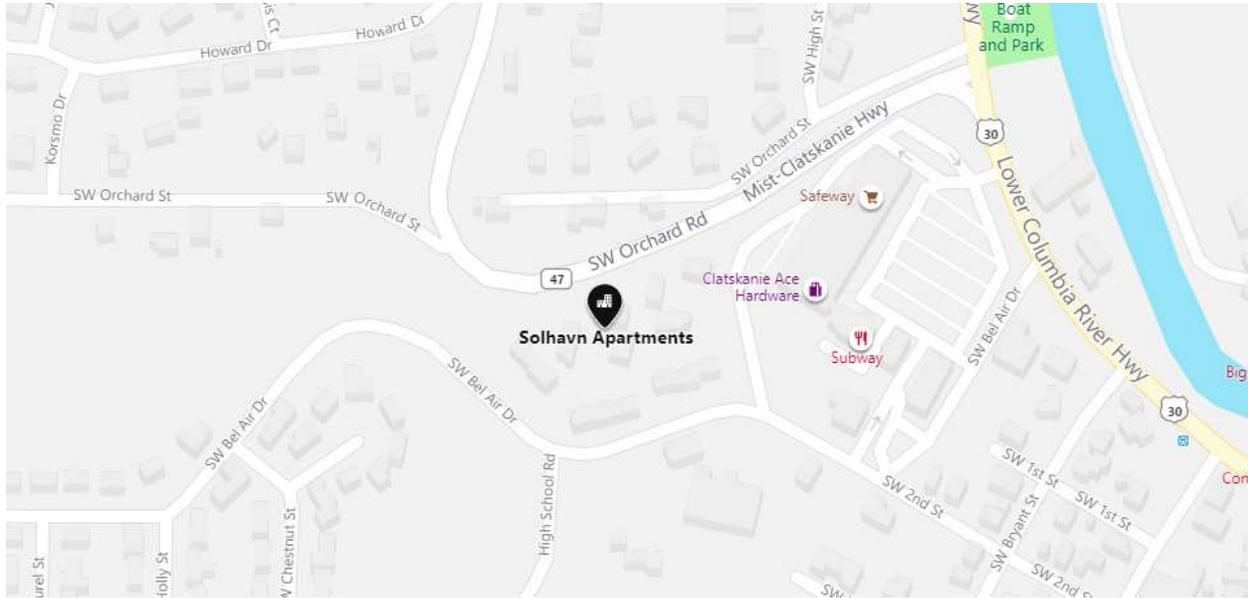
- Carpeting
- Extra Storage
- Patio/Balcony
- Skylight
- Community Laundry Rooms
- Gazebo
- Playground

Orchards Plaza





Solhavn Apartments





Date September 4, 2020

To: Housing Stability Council
Margaret Solle Salazar, Executive Director

From: Edward Brown, GHAP Program Analyst
Amy Cole, State Development Resources Manager
Casey Baumann, Production Manager
Roberto Franco, Assistant Director, Development Resources and Production
Julie V. Cody, Director, Affordable Rental Housing

RE: Deer View Cooperative, Inc. GHAP Funding Request

MOTION: Move to approve GHAP funds in an amount up to and not to exceed \$2,070,000 to Deer View Cooperative for purchase of Mobile Home Park, subject to the borrower meeting OHCS and NOAH's underwriting, closing-criteria documentation.

Overview and Location:

The property is a manufactured home park located at 25231 Alderbark Rd. in Rainier Oregon. Built in 1965 on a 16 acre lot, the manufactured dwelling park consists of 46 spaces. The park is currently and would continue to be restricted for persons 55 and older. The GHAP funds provided will be used to purchase the park. Additional construction and updating to the parks infrastructure is planned after closing.



Funding History:

There is no previous funding to the Deer View manufactured home park.

Funding Context:

The project is using GHAP funding. The project financing will also include OAHTC's from OHCS in conjunction with a permanent loan through NOAH. The Co-op will also receive a 2nd mortgage through CASA of Oregon. GHAP funding provided by OHCS will be used to purchase the park for the Deer View Cooperative, Inc.

Project Sponsor and Partnership:

The consultant CASA of Oregon has preserved over 1,000 housing units throughout the State of Oregon with over 30 years of history. The Board of Directors provides leadership, direction and helps local organizations provide housing for marginalized populations. While focusing on those who are often unable to advocate for themselves, CASA of Oregon is positioned as a liaison to the community with government, industry and community organizations.

Previous CASA of Oregon projects with OHCS have been located in Winston, Warrenton, Portland and Estacada Oregon helping over 203 residents, preserving mobile home parks through the cooperative model which provides residents to have greater control over the ground beneath their manufactured home.

General Contractor:

N/A – OHCS's resources are being used to purchase the park.

Management Agent:

The cooperative will manage their own park; OHCS resources are used only for the purchase.

OHCS Policy Priorities:

Purchase of the Deer View Mobile Home Park aligns with multiple key OHCS policies and priorities as outlined in the statewide housing plan and is doing the best it can to align with all of them using resources provided by CASA of Oregon.

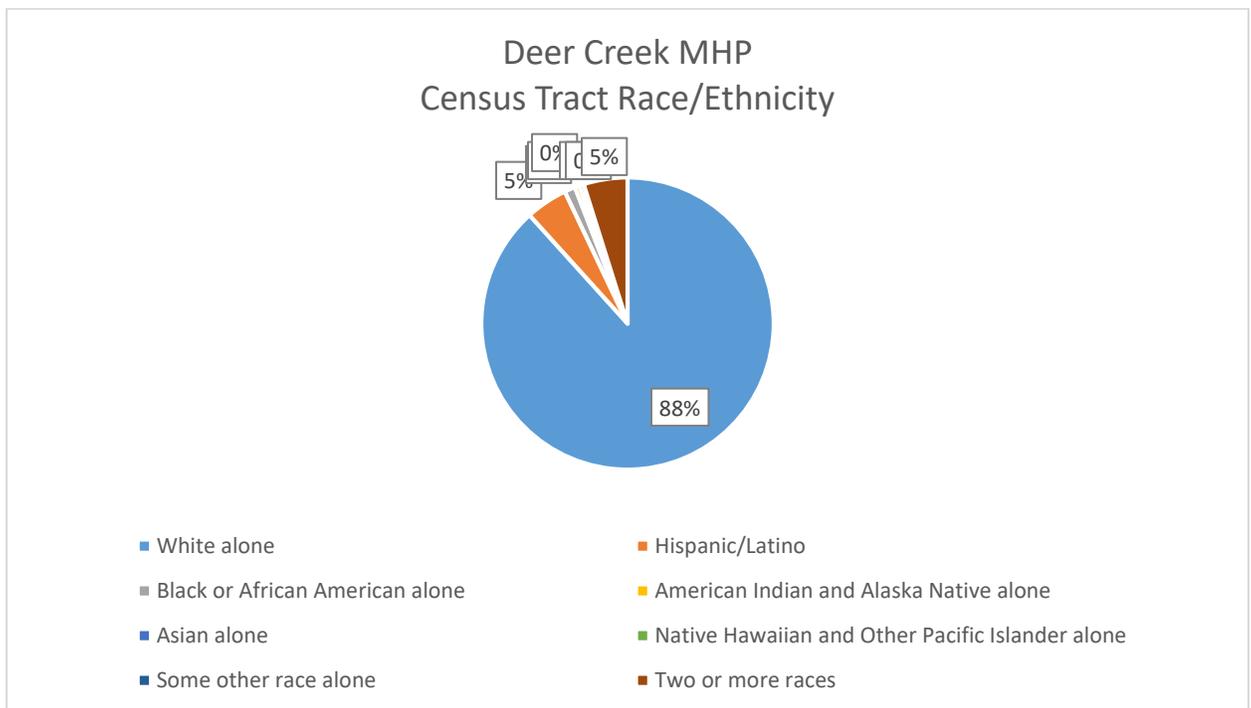
- **Equity and Racial Justice Priority:**

- **Community Demographics:**

- Deer Creek Mobile Home Park is a manufactured home park preservation project located in between Rainier and Clatskanie in unincorporated Columbia County, with 45 total spaces, 27 of which will be restricted at or below 80% MFI.

Deer Creek MHP is located in a census tract with a racial and ethnic composition that consists of 11.7% people of color, of whom 41.5% identify as Multiracial (73.6% American Indian/Alaska Native and White, 11.0% Black/African American and White, and 8.0% Asian and White), 39.6% identify as Hispanic or Latino (30.8% Mexican, 25.2% Cuban, and 44.0% Other Hispanic/Latino), and 10.2% identify as Black or African American.

The tract has a high rate of homeownership, with just 22.7% of overall households renting. This rate is skewed by race/ethnicity however, with 34.6% of multiracial households renting, 100% of Latino families renting, and 0% of Black/African American households renting. These extreme numbers are due to smaller sample sizes, but still point to trends that can help identify the area populations most likely to be impacted by the preservation of this park immediately, namely the Black homeowners in the area, and who could use this park as an entry into homeownership, primarily the Latino and multiracial/Indigenous populations.



○ **Affirmative Fair Housing Marketing Strategies:**

This is a homeownership project where our grant funds are being used to purchase the park. The Coop will execute a DEI agreement and will market homes that become available to the community.

- **Resident Services:** CASA of Oregon will provide technical assistance, ongoing training and support all cooperative members through dedicated staff, educational resources and an annual collaborative training event where manufactured housing cooperatives in Oregon and Washington gather to provide peer-to-peer support and share lessons learned.

- **Contracting, Diversity, Equity & Inclusion**
 - N/A, funding is for the purchase of the property.

- **Homelessness Priority**
 - N/A

- **Permanent Supportive Housing Priority**
 - N/A

- **Affordable Rental Housing Priority**
 - N/A, this Manufactured Home Park consists of homeowners, though the preservation of the park utilizing the cooperative model will allow the homeowners to have more control over the land that their homes reside on.

- **Homeownership Priority**
 - All members of the cooperative own their own homes. The purchase of the park using GHAP funds will preserve the park allowing homeowners to remain in their homes

- **Rural Communities Priority**
 - The purchase of the park will provide 45 affordable spaces to a rural community of Oregon.

The pages that follow will provide more technical details on the proposed project.

Project Detail: Deer View Cooperative

Project Sponsor: Deer View Cooperative, Inc.

Property: 25231 Alderbark Rd
Rainier, OR 97048

Owner: Deer View Cooperative, Inc.

Description: Mobile home park with 46 spaces situated on a 16 acre lot

Affordability:

Funding Source	Spaces	% Income	# Years
GHAP	27	80% AMI	60

Target Population: 55 and over at or below 80% AMI

Environmental

Review: A Phase I report review has been completed, the assessment has revealed no evidence of recognized environmental conditions in connection with the subject property. Partner recommend no further action at the subject property.

Finance Committee Approval: OHCS Finance Committee Reviewed and Approved this Project to be Recommended to the OHCS Director and the Housing Stability Council on Aug 25, 2020.

Summary:

Deer Point Mobile Home Park is an age-restricted 55 and older manufactured housing community located at 25231 Alderbark St in Rainier. The park was constructed in 1965. There are a total of 46 spaces located on the 16-acre parcel. Of the 46 total sites, 34 are currently rent-producing manufactured housing sites; 1 site is occupied by the manager’s and 10 are vacant RV housing sites. The Vacant RV housing sites may become revenue producing once the co-op board is able to explore a phased-in plan for their occupancy.

In addition to park acquisition, a Property Conditions Report was conducted by Partner Engineering, which identified work that will be completed after the park is placed in

service. The work identified: Park road way repair and improvements, electrical repairs at MH sites, repair/repaint laundry room building exterior, replace composition roofing on manager’s unit, add project and wayfinding signage, replace storage shed for park tools and equipment, make other exterior improvements to laundry room, clean and repairs two well houses, additional site drainage/landscape improvements, replace entrance ramp at mgrs. unit, allowance for any discovered hazardous materials, and replace, to the extent budget allows, 50+ year old 4” galvanized water lines. They also plan to replace septic line p-traps and add clean outs. They have \$1MM in the budget to make these repairs and improvements.

CASA is working with Network for Oregon Affordable Housing to provide the permanent financing for this park, and is anticipating using the OAHTC’s for their portion of the loan (\$1,300,000). CASA will provide a secondary loan to the project of \$220,000. A grant of \$2,070,000 and state tax credits of \$1,300,000 are being requested from OHCS to complete the purchase.

The anticipated project closing date is in October.

Financing Structure:

- Construction Lender:** N/A, OHCS resources are only being used to purchase the park
- Permanent Lender:** NOAH
- General Contractor:** N/A, OHCS resources are only being used to purchase the park
- Equity Investor:** N/A

SOURCES:		USES:	
OHCS Sources:			
GHAP Grant	\$2,070,000		
		Acquisition	\$2,141,649
		Construction	
		Development	\$1,449,451
Non-OHCS Sources:			
NOAH w/OAHTC	\$1,300,000		
CASA Loan	\$220,000		
Cash	\$1,100		

TOTAL Sources and Uses: \$3,591,100

Bond Structure:

N/A

Scope of Work:

N/A, OHCS resources are only being used to purchase the park

Project Schedule:

Closing is targeted for August 31, 2020

Developer Fee:

Total Developer fee: \$89,250; 6.56% of total project costs. This is below the OHCS maximum of 16%.

Tenant Relocation:

N/A, homeowners are currently residing in the project and will not be displaced.

Affordability Restrictions:

# of Spaces	Income AMI%
27	80%

Operating Expenses:

\$2,743 Per Unit Per Annum

The operating expenses are reasonable, as they are comparable to other manufactured park sites.

Debt Coverage Ratio:

- First full year of operations: 1.17
- DCR at year 15: 1.2
- DCR at year 20: 1.18

Location Amenities:

- Grocery Outlet – 5.9 mi
- Hudson Park Elementary School – 4.3 mi
- Monticello Middle School – 8.2 mi

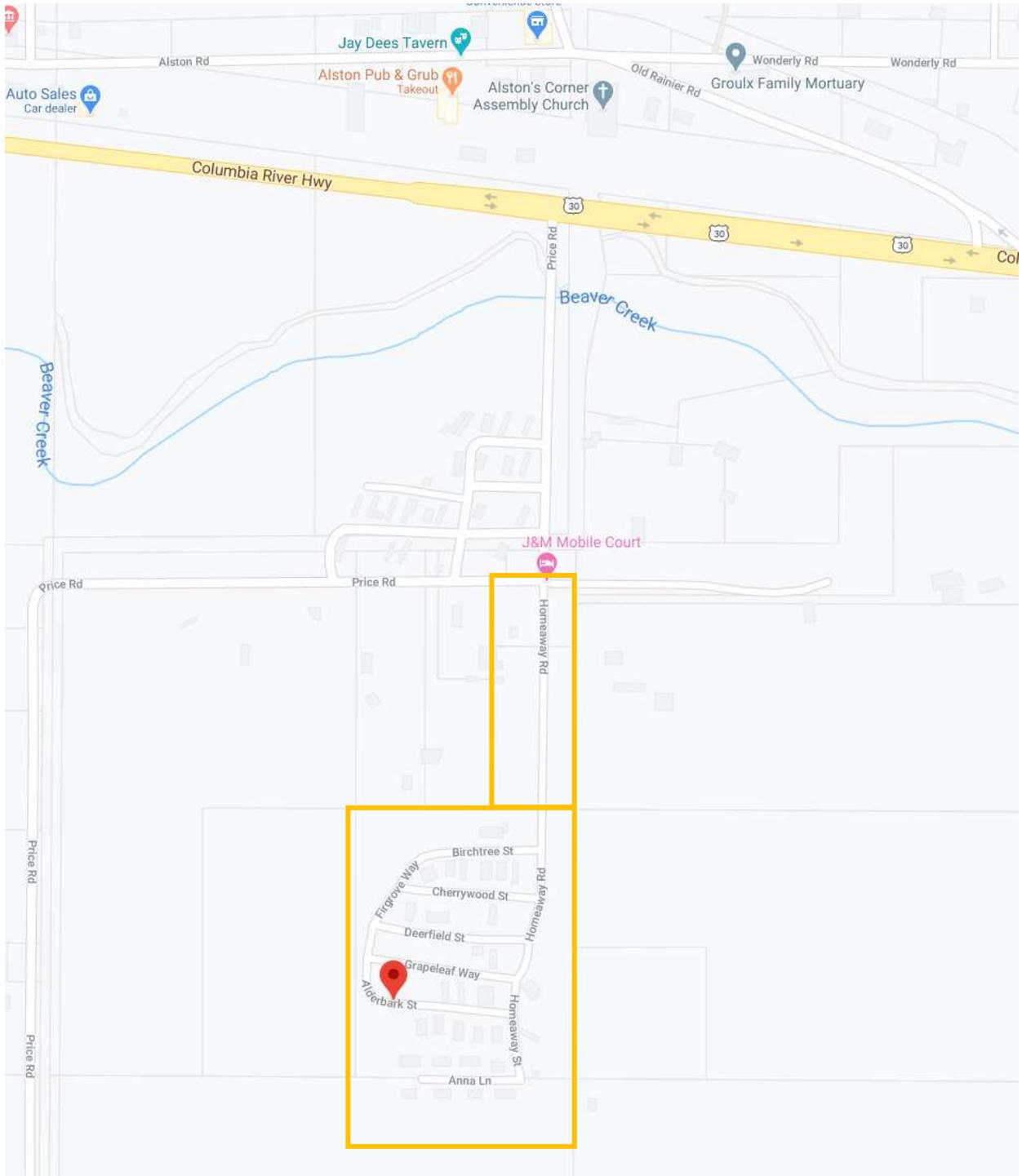
- Rainier High School – 4.2 mi
- Clatskanie City Park – 8.2 mi
- Hudson Parcher County Park – 3.6 mi
- Longview Police Station – 7.5 mi
- Cowlitz Fire and Rescue Station – 9.8 mi
- Rainier Health Center – 3.8 mi

Resident Services:

The board of directors develop community linkages by forming various cooperative committees that will help the resident's access appropriate local services and the cooperative entity itself facilitates a supportive environment in which the members are able to provide assistance to each other.

CASA, as the post-purchase technical assistance provider, will provide ongoing training and support to all cooperative members through dedicated staff, educational resources and an annual collaborative training event where manufactured housing cooperatives in Oregon and Washington gather to provide peer-to-peer support and share lessons learned.

CASA will also assist the board of directors with referrals to local public and social services in their community such as County public health, local community action agency, senior services, food pantry, legal services and homeowner housing counseling, as the need arises.





**OREGON HOUSING *and*
COMMUNITY SERVICES**

725 SUMMER STREET NE, SUITE B | SALEM, OR 97301
503-986-2000 | www.oregon.gov/OHCS

Date: September 4, 2020

To: Housing Stability Council Members;
Margaret Solle Salazar, Executive Director

From: Natasha Detweiler-Daby, Assistant Director, ARH Policy and Planning
Julie V. Cody, Director, Affordable Rental Housing Division

Re: Affordable Rental Housing Portfolio Stabilization COVID-19 Response Fund

Motion: Housing Stability Council accepts the framework as presented [or with noted revisions] for deploying the Affordable Rental Housing Portfolio Stabilization COVID-19 Response Fund.

Summary:

At the September Housing Stability Council (HSC) meeting, staff will be asking Housing Stability Council to accept the framework for the Affordable Rental Housing Portfolio Stabilization COVID-19 Response Fund, which was first introduced during the August meeting.

This fund has been seeded with \$20 million in federal COVID response resources and allocated to this effort by the Oregon Legislature. These resources must be spent by December 30, 2020, so staff are fast tracking this program development and strategy. The Oregon Legislature has also repurposed \$6 million in general fund resources to align with this effort; these resources can be disbursed over a longer period, through June 30, 2021.

The framework is deliberately set up to deploy the initial \$20 million in federal resources before the end of the calendar year, and allows the addition of the remaining \$6 million in state resources to the set-aside categories if over-subscribed. Our modeling of need shows that the need will become greater over time, so we will be tracking to determine the success of this intervention and will be prepared to seek additional resources if they become available to support ongoing needs. If the \$20 million is not over-subscribed, the remaining \$6 million in state resources will be made available under a similar framework to address portfolio rent payment deficits in January to June 2021.



Overview:

As discussed at the August HSC meeting, the COVID-19 pandemic has launched Oregonians statewide into economic instability as businesses close and priority is placed on adopting practices such as physical distancing to lessen the spread of the virus. As a consequence, households are struggling to pay rent. While rent receipts overall to-date have been higher than initially projected, we are faced in the near-term with the end of the statewide Eviction Moratorium on September 30th. At that point, households that have not been able to pay rent will have just six months to repay any arrearages.

The number one priority is to keep vulnerable Oregonians housed during this crisis and limit the economic burden on them long-term, as well as retaining affordable rental housing stock for these and future generations. To that end, OHCS has established the Affordable Rental Housing COVID-19 Response Fund to provide short to mid-term loans to affordable housing property owners with the explicit understanding that the loan will be deemed satisfied (repaid) when the property owner satisfies rent arrearages (accrued non-payment of rent) in an amount greater than or equal to the amount of the loan.

The following pages provide the proposed framework for this critical effort. This framework incorporates substantial public input and feedback, documented in the tables and letters included in the HSC packet, with project owners and managers as well as affordable housing lenders and investors.

Next Steps

At the meeting, we will provide a brief overview of the framework with a focus on areas of deliberate change since our August introduction of this concept. Upon acceptance by HSC, OHCS will move forward in developing the solicitation and necessary documentation to be able to deliver these resources to projects and Oregonians before the end of the year.



AFFORDABLE RENTAL HOUSING

Portfolio Stabilization COVID Response Fund

<p>Program Intent</p>	<p>The objectives for the Affordable Rental Housing COVID Response Fund (ARH CRF) resources for the project-specific intervention are two-fold:</p> <ol style="list-style-type: none"> 1- To stabilize households living in OHCS funded Publicly Supported Housing. 2- To ensure the ability for the project to continue to operate (pay to operate the project, pay salaries, and debt service etc.). <p>This will be accomplished by loaning resources to the sponsor of a project and allowing the loan to be satisfied in exchange for the settlement of outstanding rental arrearages of the same or higher dollar value.</p>
<p>What problem is this addressing?</p>	<p>These affordable rental housing projects serve low income Oregonians, and due to COVID-19 are facing higher than sustainable levels of non-payment of rent. This reduction in rental income deteriorates the owners' ability to sustain the operations of the project, including paying any outstanding property debt, making required reserve contributions, and supporting higher cleaning costs in response to COVID-19. These operational loans will allow owners to have resources to cover operational needs during COVID-19 while adhering to the current state of Oregon Eviction Moratorium order. At the same time, with the expiry of the state of Oregon Eviction Moratorium, tenants are faced with needing to repay rent arrears even though they may still not be in a position to do so. By allowing the loan to be satisfied through satisfaction of individual tenant of rent arrearages, the project is able to continue to operate and the households are stabilized in the short term.</p>
<p>Eligibility</p>	<p>To be eligible for resources under this offering, the project must be an OHCS funded Publicly Supported housing project (ORS 456.260). Rationale: These are projects that have been funded to provide affordable rental housing to Oregonians and must abide by ongoing robust regulatory compliance activities to demonstrate adherence with established federal and state program requirements, where OHCS has already provided some level of investment.</p>
<p>Set-Asides:</p>	<ul style="list-style-type: none"> - [\$ 7 million] CULTURALLY SPECIFIC sponsors in affordable rental housing, or projects with dedicated AG HOUSING units; target half of the resources for Ag Housing Projects - [\$ 3 million] NON-PROFIT sponsors or SMALL PORTFOLIO SPONSORS (fewer than 200 units); target half of the resources to Rural Projects - [\$10 million] OPEN COMPETITIVE; target half of the resources to Rural Projects

How would it work?

- Competitive Application for Project Applications
 - \$20 Million in Federal COVID Response Resources will be available
 - If over-subscribed, OHCS may include the additional \$6 Million in State Resources to the set-asides in this offering; if not they will be made available in early 2021 to address ongoing needs.
- Streamlined Application in September / October.
 - Application will allow an organization to submit one application, and include the detail on each of the projects in their portfolio, for which they are seeking funds, in that single application;
- Funds issued as loans, and must be funded by December 30, 2020
- Loan issued to Sponsor of the project and intended to benefit specified projects.
 - Resources will be flagged to individual projects within the organizations portfolio; based on the information provided at application. Therefore, if over-subscribed, sponsor applications may be partially funded.
- Loan based on the total rent arrearages at the time of application (estimated to go from March 1, 2020 through October 2020 scheduled rent collections). Any rent assisted household arrearages should be based solely on the tenant portion of rent owed (unless federal budget on HUD or USDA/RD assistance limitation is met; otherwise assumed that rental assistance provider has covered its portion).
 - If under-subscribed, give discretion for OHCS to provide additional resources to the projects demonstrating highest vulnerability to provide additional resources for projected tenant needs.
 - If over-subscribed, give discretion for OHCS to choose to fund partial requests at the project level to satisfy agreed upon percentages of tenant arrearages.
- Loan terms:
 - 0% interest
 - Due no later than March 31, 2021 to allow for documentation of rent arrears satisfaction for each tenant and submission to OHCS for loan satisfaction.
 - **Required project-level eviction prohibition for COVID-related nonpayment of rent through the earlier of end of month loan is satisfied or April 30, 2021.**

How to Prioritize Resources?

In **all Set-Asides**, projects will be prioritized based on a **VULNERABILITY ASSESSMENT**
Below is a high-level overview of proposed criteria for the Vulnerability Assessment; see next page for details.

PROJECT DATA (applicant provided):

- Tenant Severe Rent Burden
- Rent Assistance Rates (project or voucher-based)
- Rent nonpayment Rate (for occupied units)
- Operating Reserves
- Foreclosure Risk
- Project Demographics

COMMUNITY DATA (OHCS provided):

- Community Demographics
- COVID Rates
- Unemployment Rates

Additionally, projects within the **OPEN COMPETITIVE** set-aside will be prioritized based on their ability to **leverage** these resources to satisfy tenant rent arrears. (ie: a project that will accept 60 cents for every \$1 dollar in rent they satisfy would be given priority over one that requires 90 cents for every \$1 dollar owed in rent).

Vulnerability Assessment Detail Criteria:			Submission
Tenant Severe Rent Burden	<i>detail:</i>	<i>Based on tenant level data; severe rent burden is spending more than 50% of household income on rent expenses (including any utility allowance) as of the documentation date</i>	applicant provided; based on most recent Certificate of Continuing Compliance (CCPC) or project rent increase request.
	3 points	more than 50% of tenants are severely rent burdened	
	2 points	30 - 49% of tenants severely rent burdened	
	1 point	15 - 29% of tenants severely rent burdened	
Tenant BIPOC Demographics	<i>detail:</i>	<i>Based on applicant provided data on the tenant demographics; specific scoring criteria TBD</i>	applicant provided rent roll or summary data
	3 points	criteria TBD	
	2 points	criteria TBD	
	1 point	criteria TBD	
Percent of Project with Rent Assistance	<i>detail:</i>	<i>Based on applicant provided data on the number of project based and voucher based rent assistance.</i>	applicant provided rent roll; rent assistance included based on long term ongoing programs vs temporary programs.
	3 points	0 - 10% of tenants with rent assistance	
	2 points	11-20% of tenants with rent assistance	
	1 point	21-30% of tenants with rent assistance	
Percent of Economic Vacancy	<i>detail:</i>	<i>Calculated as: rent received from occupied units divided by rent potential from occupied units from March 5, 2020 through October 5, 2020. (vacant units excluded; current residential tenants only; if rent-assisted include tenant rent only)</i>	applicant provided rent roll
	3 points	more than 20%	
	2 points	16-20% economic vacancy	
	1 point	10% - 15% economic vacancy	
Operating Reserve	<i>detail:</i>	<i>based on dedicated project operational reserves</i>	applicant provided in questionnaire; ability to provide evidence if requested
	3 points	no operating reserves; reserves to cover less than 2 months expenses	
	2 points	operating reserves cover 2-4 months expenses	
	1 point	operating reserves cover 4-6 months expenses	
Foreclosure Risk	<i>detail:</i>	<i>of first position primary loan supporting project</i>	applicant provided
	3 points	evidence of a financial even of default or notice of foreclosure from March 1, 2020 through application deadline date	
Community Demographics	<i>detail:</i>	Census Tract level data on rates of community population that has been disproportionately impacted by COVID-19; to include BIPOC	Census / American Community Survey; criteria under development
	3 points	criteria TBD	
	2 points	criteria TBD	
	1 point	criteria TBD	
COVID Rates	<i>detail:</i>	Oregon Health Authority data on COVID-19 infection rates	OHA / OHCS provided; criteria under development.
	3 points	criteria TBD	
	2 points	criteria TBD	
	1 point	criteria TBD	
Unemployment Rates	<i>detail:</i>	Oregon Employment Dept data on local unemployment rates	OED / OHCS provided; criteria under development.
	3 points	criteria TBD	
	2 points	criteria TBD	
	1 point	criteria TBD	
<i>only applies to Open Competitive Set-Aside Pool</i>			
Project Leverage Ratio	<i>detail:</i>	Calculated based on funding request; if a project that will accept 60 cents for every \$1 dollar in rent arrearages of occupied units from March 1, 2020 through application deadline date, that is a 60% Leverage Ratio.	applicant provided in application request for resources.
	3 points	60-69%	
	2 points	70-79%	
	1 point	80-89%	

Topic by category:	Feedback on Framework Version:	Comment summary:	OHCS Response:	Comment Submitted By:
Advocacy	version 1	OHCS and state leadership should support other efforts and acknowledge that these resources are insufficient.	Thank you.	REACH
Advocacy	version 1	RD projects that don't have OHCS funding - OHCS should advocate for resources to help	Thank you.	FHDC;CASA; Bienestar; Hacienda
Framing	version 1	Objectives should 1st be stabilizing tenants 2nd stabilizing projects	Updated goal description	CASA letterCCOHousing OregonREACH
Eligibility	version 1	Department funded Manufactured Home Cooperatives should be eligible.	Limited to OHCS funded Publicly supported housing per ORS; both for simplicity in program delivery, and complexity of performance requirements. Please note: manufactured home park residents are eligible to receive rent assistance for space-rent. OHCS leadership has also flagged that this issue is one that the new MH Advisory Board should take on.	CASA letter
Eligibility	version 1	If the department decides to deny the cooperatives access to these ARH funds, we would ask that the department clearly state the reason. We would also request that should the cooperatives not be considered eligible for these funds, that it be clearly stated on any and all solicitations issued for these funds the reason for the cooperatives ineligibility. Some of the cooperatives have reached out to us about the availability of these funds and we want to make sure they understand which funds are available to them and which ones aren't and the reasons why and why not.	Added explanation in framework. Limited to OHCS funded Publicly supported housing per ORS; both for simplicity in program delivery, and complexity of performance requirements. Please note: manufactured home park residents are eligible to receive rent assistance for space-rent. OHCS leadership has also flagged that this issue is one that the new MH Advisory Board should take on.	CASA letterHousing Oregon
Eligibility	version 1	Do not exclude rent assisted housing (because with job loss they may still face eviction; and the overall \$ needs would be smaller anyway).	Allowing tenant portion of rent arrearages to be included	CDP
Eligibility	version 1	Homeownership projects should be included	Limited to OHCS funded Publicly supported housing per ORS; both as the intention of the program to benefit renters, as well as simplicity in program delivery, and complexity of performance requirements.	Housing Oregon
Set-Aside	version 1	Rural focus is important	Included a target for half of the resources to serve rural in two of the set-aside groups	CCOHousing Oregon
CS Set-Aside	version 1	Significant set-aside for culturally specific organizations who are already working with farmworkers, latinx groups, and essential workers.	Set-Aside established	CASA letterREACHPCRI
CS Set-Aside	version 1	\$10 MM set-aside for culturally specific organizations and/or farmworker housing	Set-Aside established at \$7 million	FHDC;CASA; Bienestar; Hacienda
NonProfit	version 1	Prioritize non-profit owners and operators	Set-Aside established at \$3 million	Housing OregonREACH
NonProfit	version 1	Either give non-profits preference, ro require significantly higher leverage ratio as the base for profit operators.	Set-Aside established at \$3 million	REACH
NonProfit	version 1	Set-asides fro non-profit owned and publicaly owned projects that can demonstrate that a significant portion of their residents are BIPOCs.	Non profit set aside established (\$3 MM) Culturally specific set-aside established (\$7 MM). Added project demographics to vulnerability assessment.	CASA letterFHDC;CASA; Bienestar; Hacienda
COC	version 1	Should prioritize / identify projects with higher percentages of Residents of Color, or higher percentages of Residents of Color who owe rent arrears. These priorities should be added. (Note: the actual language could be adapted if needed to identify communities disproportionately impacted by homelessness/poverty, rather than being specific to race or ethnicity.)	Added project demographics to vulnerability assessment.	CCOHousing Oregon
Leverage Ratio	version 1	Latinx populations in general and farmworkers in particular prioritize paying rent -- impacts the leverage ratio	Projects with Ag worker set-asides eligible for the \$7 million set-aside; Added project demographics to vulnerability assessment.	CASA letter

Topic by category:	Feedback on Framework Version:	Comment summary:	OHCS Response:	Comment Submitted By:
Leverage Ratio	version 1	Reconsider the leverage ratio -- specifically disadvantages the properties and residents most at risk, including those with HUD/RD funding which specifically disallows operating reserves and/or requires operation at break-even cash flow.	Leverage ratio not a factor for scoring within the Culturally specific, non profit, small portfolio set-asides.	CCOHousing Oregon
Leverage Ratio	version 1	Leverage ratio - could favor larger sponsors; do not use it or if you need to, use standards that are based on organizational size.	Leverage ratio not a factor for scoring within the Culturally specific, non profit, small portfolio set-asides.	REACH
Leverage Ratio	version 1	concern that asking owners to propose their own leverage ratio may encourage a “race to the bottom” with projects desperate to recover any amount of income lost proposing greater leverage ratios and other projects trying to keep up. OHCS should either A) set scoring criteria that include specified ratios attached to scaled, specified scores, or b) set a minimum leverage ratio (this could be different for different kinds of projects) and allow projects to go higher, ie forgive more rent, with no impact to their eligibility or score. Otherwise we are concerned that the focus on projects that can grant higher leverage ratios will end up prioritizing newer projects with higher set asides that are more financially stable which are the ones that need less help from OHCS.	Leverage ratio not a factor for scoring within the Culturally specific, non profit, small portfolio set-asides.	Human Solutions
Leverage Ratio	version 1	Leverage ratio - disadvantages lesser capitalized organizations	Leverage ratio not a factor for scoring within the Culturally specific, non profit, small portfolio set-asides.	PCRI
Leverage Ratio	version 1	60-80 leverage ratio would be difficult for the majority of their projects to commit to.	Leverage ratio not a factor for scoring within the Culturally specific, non profit, small portfolio set-asides.	Human Solutions
Vulnerability Criteria	version 1	Housing Burden should be a criteria	Included in the vulnerability assessment	CCO
Vulnerability Criteria	version 1	Vulnerability Index: low DCR, Low per-unit cash flow, higher percentage of rent arrearages and /or higher concentration of residents of color	Added project demographics to vulnerability assessment. Included the rent arrearages and community demographics, and reserves in the vulnerability assessment.	CCOHousing Oregon
Vulnerability Criteria	version 1	prioritize any risking mortgage default or bankruptcy.	Added to vulnerability assessment	CDP
Vulnerability Criteria	version 1	OHCS should allow more financially distressed projects to receive comparable consideration as less distressed properties for lower leverage ratios; as in, OHCS should consider the financial status of a project when determining how competitive its application is. Otherwise, resources may go to projects with less overall financial need that are less in need of help.	Leverage ratio not a factor for scoring within the Culturally specific, non profit, small portfolio set-asides. Included other factors such as reserve ability, and rent arrearages to the vulnerability assessment.	Human Solutions
Vulnerability Criteria	version 1	Alternative measures to consider and prioritize as a way to ensure those most heavily impacted by COVID (communities of color) are served by these resources: <ul style="list-style-type: none"> o Ratio of max rent to actuals (prioritize projects with low rents) o Number of rent burdened households o Low operating cash and operating deficit reserve o Projects in historically Black neighborhoods o Projects with larger representation of BIPOC households o Projects in under-resourced areas/QCTs 	Majority of these are included or reflected in the vulnerability assessment; not prioritizing those projects that have not increased rents to meet operational needs, but are prioritizing based on relative scale of non-payments.	Human Solutions
Vulnerability Criteria	version 1	Do not consider project size	Created a set-aside for project owners that have small portfolio size to ensure access; have also added the rural target within that and the open competitive pool.	Human SolutionsPHB

Topic by category:	Feedback on Framework Version:	Comment summary:	OHCS Response:	Comment Submitted By:
Vulnerability Criteria	version 1	Multnomah County is not allowed to require tenants to enter into a workout plan; can't be part of the criteria.	No workout plan documentation is required.	Human Solutions
Vulnerability Criteria	version 1	Test chosen criteria before implementing.	Agreed.	Human Solutions
Vulnerability Criteria	version 1	REACH advocates for prioritizing the COVID Response Fund to projects with highest concentration of de-stabilized and/or potentially vulnerable households, measured by: <input checked="" type="checkbox"/> Percentage of rent that is in arrears (i.e. unpaid rents April through August as percentage of total possible rent). <input checked="" type="checkbox"/> Percentage of households with rent arrearage. <input checked="" type="checkbox"/> Percentage of households with members who identify as people of color. <input checked="" type="checkbox"/> Percentage of households with members who are disabled and/or over age 50	Added project demographics to vulnerability assessment; using tenant data on burden, and arrearages.	REACH
Vulnerability Criteria	version 1	Support prioritizing those with higher % of unassisted units	Included in the vulnerability assessment	PHB
Vulnerability Criteria	version 1	Support prioritizing BIPOC #s	Added project demographics to vulnerability assessment.	PHB
Vulnerability Criteria	version 1	separate project struggling pre-covid from those struggling bc of covid	Using both the scale of the arrearages to projects as well as operating reserve information; meaning a project that has had to access and deplete reserves should then be able to demonstrate a both low access to reserves as well as scale of arrearages. By choosing to attribute points based on the reserves today we are also acknowledging that a project that has no or very limited reserves are more vulnerable to rent-non payment than those that retain six months or more of operating reserve resources to keep the proejct operating despite rent non payments.	PHB
Reporting	version 1	Public reports on the organizations and projects given awards.	Agreed.	Human Solutions
Reporting	version 1	Reporting incorporated into existing compliance and financial reporting platforms	Agreed.	
Documentation	version 1	COVID-Impact documentation should not be required; burden on tenants, etc etc	No documentation required.	CCOHousing Oregon
Documentation	version 1	Resist the temptation to be suspicious of residents in need of assistance; they are trying to get by and balance needs.	Agreed.	CCOHousing Oregon
Structure	version 1	Fund directly to organizaitons rather than projects (would prefer the money goes directly to residents but understands the concerns).	Agreed, based on feedback have defined this as Sponsor.	CASA letter
Structure	version 1	Application needs to be simple (not a barrier)	Agreed.	CCOHousing OregonHuman Solutions
Structure	version 1	Should make sure that any forgiveness of tenant debt does not impact residents ability to access other benefits.	Agreed; should not impact.	CCOHousing Oregon
Structure	version 1	Fund all parties applying for resources proportionately; if over subscribed, fund them at the level possible.	Will add this flexibility	CDP
Structure	version 1	Clearly spell out program use, so that landlords can include in communication to tenants in advance of funding decisions.	Agreed, will strive to include tenant communication.	

Topic by category:	Feedback on Framework Version:	Comment summary:	OHCS Response:	Comment Submitted By:
Structure	version 1	Other guideline suggestions: A) Residents can be capped at their repayment plan; for example: max of [12] months of [10%] of income B) Resident must begin paying full rents on [January 1st] C) Owner agrees to a minimum of a [matching] contribution via write-off; and a maximum of [still allowing scenario A to play out]2 D) Owners provide a year-end 2020 and 2021 affidavit; certified by the owner and management company. If the relief is greater than [\$2,500], then an auditor should sign the affidavit. (Management companies know who lost income from Covid whereas owners would be incentivized to include additional delinquent rent; auditors can verify that tenant ledgers are credited with the OHCS relief as well as the ownership write-off) E) Owner write-off occurs after any payment plan is satisfied (i.e. if a resident must pay [\$50] per month for up to [12] months, the write-off occurs afterwards. This incentivizes residents to continue payments of future rents and a small portion of back rents.)	Appreciate the alternative structure proposal; choosing to pursue a strategy determined to be as simple as possible; aligning with March - October rent arrearages to simplify expenditure timeline limitations and correspond with the expiry of the Eviction Moratorium.	CDP
Structure	version 1	Want to offer their help in operationalizing	Thank you.	Housing Oregon
Structure	version 1	If rent assisted households can't benefit, then there should not be a building wide eviction hold	Rent assisted household portion of rent payment is included.	Human Solutions
Structure	version 1	Loan the funds this CY, do not satisfy arrearages until the 6 month repayment period ; then allow projects to repay any amount that was repaid by a household to satisfy an equal amount of the loan.	Considered this structure and determined that a simplified delivery will be more efficient to meet the needed expenditure timeline.	Human Solutions
Structure	version 1	Should include commercial arrearages as well as those for tenants.	These resources are to benefit the residents and the residential portfolio; understand that commercial property is suffering as well, though we finance those separate to ensure ongoing viability of residential units.	IHI
Structure	version 1	Support eviction prohibition during term of loan; curious if it's related to arrears repayments, or just rent or both	Will be tied to any non-payment.	PHB
Structure	version 1	What happens if tenants have moved, and have left arrears behind?	If tenant left with documented rent arrearages that follow them, then those arrearages can be included if they can demonstrate access to communicating this resolution to the tenant. Otherwise, the arrearage is limited to existing current tenants in occupied units.	PHB
Structure	version 1	Less admin burden please	Agreed.	PHB
Structure	version 2	Please consider partial funding of applications if the program is significantly oversubscribed.	Added this as discretionary ability	PHB

Topic by category:	Feedback on Framework Version:	Comment summary:	OHCS Response:	Comment Submitted By:
Vulnerability Criteria	version 2	<ul style="list-style-type: none"> As this funding is intended to support affordable housing providers struggling as a result of COVID-19, OHCS should differentiate between projects struggling pre-COVID and those struggling as a result of COVID in all elements of the program. Specifically, we believe that prioritizing projects in the “operating reserve” category even if they had low operating reserves pre-COVID undermines the intent of the program. Projects with low operating reserves as a result of COVID should be prioritized. 	Believe that this is going to be reflected in the scale of the arrearages to projects; meaning a project that has had to access and deplete reserves should then be able to demonstrate a both low access to reserves as well as scale of arrearages. By choosing to attribute points based on the reserves today we are also acknowledging that a project that has no or very limited reserves are more vulnerable to rent-non payment than those that retain six months or more of operating reserve resources to keep the proejct operating despite rent non payments.	PHB
Vulnerability Criteria	version 2	<ul style="list-style-type: none"> OHCS should consider looking at the demographics of the project, or the community served by the provider at large, as opposed to the census tract. 	Added project demographics to vulnerability assessment.	PHB
Structure	version 2	<ul style="list-style-type: none"> Given the shortage of available funding, and the desperate need in the community, we urge you to include the \$6 million in this round of applications 	Added this as discretionary ability	PHB
Vulnerability Criteria	version 2	<ul style="list-style-type: none"> We suggest increasing the rent burdened level from 30 to 50% to more effectively prioritize projects serving people who are more vulnerable to not being able to afford their rent. 	Updated to 50% / severe rent burden	PHB



July 31, 2020

RE: COVID Response Fund

Dear Director Salazar and Members of the Housing Stability Council,

CASA of Oregon is grateful to be able to comment on this important funding source to support households living in affordable housing projects.

First, we would like to make some general observations. The initial objective as stated in the draft proposal “is to stabilize Affordable Rental Housing (ARH) project operations”. The second stated objective is to stabilize households. I would like to suggest that the objectives be reversed and that the focus be first and foremost on the residents of ARH.

In my experience in working with latinx populations in general and farmworker families in particular, the rent bill is the first to get paid. While I understand the intent of the program, it disadvantages those who may have prioritized paying the rent at the expense of other necessities. While the department is focused on the health of projects and organizations, unintended consequences may be to disadvantage those with the greatest needs.

While the legislature has complicated this program by making it a loan, the goal of OHCS should be to keep the program simple for organizations and for the department. The need to get these funds out the door quickly means that taking a “business as usual” approach (ie organizations competing for the funds) will make it hard to meet the timelines.

Everyone is struggling right now as it is. We suggest that the department direct a significant portion of these funds to culturally specific organizations. This should be accomplished by direct allocations to organizations who are already working with farmworkers, latinx groups and essential workers. If unable to do that, then establish set-asides within a competitive application for culturally-specific organizations. There should also be set-asides for organizations and/or projects serving specific groups (i.e. farmworkers). We also believe there should be set asides for non-profit owned and publicly owned projects that can demonstrate that a significant portion of their residents are BIPOCs.

We would also like to see the funds allocated directly to organizations rather than projects. We would really prefer the funds to be allocated directly to individual residents but understand that the department is concerned with the potential tax implications on the recipients.

We would also like to note that the department has informed CASA of Oregon that non-profit, manufactured housing cooperatives have been excluded as a possible recipients of these funds. While it appears (from a review of the legislative intent) that these cooperative organizations should not be precluded from receiving support from this fund, the department has determined they will be excluded. To date, all of the 17 nonprofit manufactured housing cooperatives formed have received funding from OHCS which should make them eligible. Many of the residents are struggling to make their pad rents. We request that OHCS ensure that the cooperatives have access to the COVID Response Fund.

If the department decides to deny the cooperatives access to these ARH funds, we would ask that the department clearly state the reason. We would also request that should the cooperatives not be considered eligible for these funds, that it be clearly stated on any and all solicitations issued for these funds the reason for the cooperatives ineligibility. Some of the cooperatives have reached out to us about the availability of these funds and we want to make sure they understand which funds are available to them and which ones aren't and the reasons why and why not.

As always, thanks for your support of our work and the work of affordable housing organizations and they people they serve.

Kind Regards,



Peter Hainley
Executive Director

COMMUNITY AND SHELTER ASSISTANCE CORP.
20508 SW Roy Rogers Rd. Suite 155, Sherwood, OR 97140 | 503.537.0319
CASAOFOREGON.ORG



July 31, 2020

State of Oregon Department of Housing and Community Services
Via email to: arh.hcs@oregon.gov

RE: Draft Affordable Rental Housing COVID Response Fund

Dear Affordable Rental Housing Staff and OHCS Leadership,

Thank you for reaching out to owners and providers of affordable rental housing to seek our feedback on the draft COVID Response Fund. I appreciate your willingness to consider our on-the-ground experience to ensure the fund provides the intended benefits and impacts—and that it benefits *who* it is intended to support.

To the point above, I would recommend OHCS begin revising its COVID Response Fund draft by re-centering the program intent *first* on the objective to stabilize households, *then* on the objective to stabilize project operations, which are likely to follow naturally when households are stabilized.

Second, I would encourage OHCS to reconsider the requirement and/or amount of leverage required or prioritized for success in a competitive application. This requirement specifically disadvantages the properties and residents most at risk, including those with HUD/RD funding which specifically disallows operating reserves and/or requires operation at break-even cash flow.

Beyond these two initial recommendations, I would strongly encourage OHCS to re-center its priorities to align them with its values. As evidenced in the Statewide Housing Plan, OHCS has spent incredible effort in recent years defining and documenting its values. Unfortunately, the draft COVID Response Fund proposal does not adequately center those values. Specifically:

- The Statewide Housing Plan Goal for Equity and Racial Justice states, “*Communities of color will experience increased access to OHCS resources and achieve greater parity in housing stability, self-sufficiency and homeownership,*” yet none of the ideas for priorities identify projects with higher percentages of Residents of Color, or higher percentages of Residents of Color who owe rent arrears. These priorities should be added. (Note: the actual language could be adapted if needed to identify communities disproportionately impacted by homelessness/poverty, rather than being specific to race or ethnicity.)
- The Statewide Housing Plan Goal for Affordable Rental Housing states, “*Residents of affordable rental housing funded by OHCS will have reduced cost burden ...*”, yet the draft proposal does not identify rent burden as a priority. Residents who experience higher rent burdens are more likely to become homeless and investment to ensure the stability of these residents will be especially meaningful to prevent homelessness.
- The Statewide Housing Plan also prioritizes supporting the needs rural communities. While the draft proposal includes some priorities which begin to address these needs (such as communities that do not have rent assistance resources available or a potential set-aside for rural and/or smaller project), these priorities could be strengthened to ensure they better address the needs and economic impacts for rural residents.

In addition, please consider these further suggestions and concerns

- Organizations and/or projects most at risk may also be those with limited staff capacity for a competitive application with arduous application requirements. Ensuring an application is simple and easy to navigate will help ensure small, rural, and culturally-specific organizations—and especially residents of their housing—are not unintentionally disadvantaged in this application.
- As discussed in the July 22 Housing Alliance meeting, a Vulnerability Index could be easily defined to prioritize projects most at risk. This might consider projects with low debt service coverage, low per-unit cash flow, a higher percentage of rent arrearages and/or a higher concentration of Residents of Color.
- There are multiple mentions of this assistance as being intended for tenants who have experienced COVID-related impacts and can't pay rent. This is understandable given the source of these funds, but the burden of proof should not be borne by residents if at all possible. It sounds like OHCS already has this in mind, and I would encourage OHCS to retain the ability for owner/operators to confirm that the impacts are COVID-related without further tenant burden.
- We must resist the temptation to be suspicious of residents who may need this assistance. Residents are understandably scared of losing their housing and are making incredibly difficult decisions to balance keeping food on the table *and* a roof over their head. We must trust that the overwhelming majority of residents in need value this assistance as a last resort. The final proposal must not ask what the draft proposal does, *"How can we deploy these resources and not dis-incentivize rent payment by any household that is able?"*
- While I believe OHCS has already considered some potential unintended consequences for residents, it is important to ensure any forgiveness does not impact residents' ability to access other benefits.

Again, I appreciate OHCS' efforts to reach out to owners and operators of affordable housing to ensure this fund's intents are aligned with OHCS' priorities, and the intent of the fund is reflected in its impacts. I believe there is work that is still needed to achieve this, and I welcome OHCS' continued communication with organizations delivering this much-needed affordable housing and working to ensure continued housing stability for those who are most vulnerable.

Sincerely,



Travis Phillips
Director of Community Development and Housing

DETWEILER Natasha * HCS

From: Brad Long <brad@communitydevpartners.com>
Sent: Tuesday, July 21, 2020 5:09 PM
To: ARH.HCS * HCS
Cc: Brad Long
Subject: 07-21-2020-Technical-Advisory-COVID-Response-Fund

Follow Up Flag: Follow up
Flag Status: Flagged

To Whom It May Concern:

I'm the Director of Asset Management with Community Development Partners ("CDP") and oversee 8 communities in Oregon, consisting of 569 units. We have an additional 305 units under construction, and over 500 units in the development pipeline that are pre-funded. Below are some of my suggestions, and I'm more than happy to have follow up conversation if it would help. Here's an outline of what I foresee to be a fair plan that stretches OHCS dollars the furthest, keeps residents housed the longest, and theoretically minimizes the work done by OHCS.

The only way to be fair is for OHCS to spread the funds to all requesting parties, proportionally. If the total ask is \$100 million of relief, and OHCS has \$20 million, then owners receive 20 cents on the dollar from OHCS. However, OHCS should also set aside some of their funds to directly assist project owners risking defaulting on their mortgage payment, or bankruptcy. (Though lenders have expressed willingness to work with owners.)

The overall financial burden should be shared between OHCS, owners as well as residents to a reasonable extent. If the program is spelled out well at the time of application, owners can commit on the application for write-offs and an extension of the eviction moratorium. Thereby, ownership can commit and communicate to residents by [10/31], or in advance of receiving relief funds.

(Theoretically, residents affected by Covid-related job losses should be receiving X% of their income through unemployment benefits. If that proportion is 1/3, then it's an easy ask for OHCS, ownership and residents to commit to sharing the responsibility evenly. I'm also illustrating why OHCS probably only needs to come up with 30 cents on the dollar for this whole program to work.)

Furthermore, OHCS should not exclude subsidized properties for three reasons: 1) residents are more likely to be on fixed income and not at risk of job loss, 2) in the event a resident did lose a job, they would still be at risk of eviction, and 3) any requests for relief for a subsidized tenant should be minimal compared to unsubsidized properties.

Other guideline suggestions:

- A) Residents can be capped at their repayment plan; for example: max of [12] months of [10%] of income
- B) Resident must begin paying full rents on [January 1st]
- C) Owner agrees to a minimum of a [matching] contribution via write-off; and a maximum of [still allowing scenario A to play out]

D) Owners provide a year-end 2020 and 2021 affidavit; certified by the owner and management company. If the relief is greater than [\$2,500], then an auditor should sign the affidavit. (Management companies know who lost income from Covid whereas owners would be incentivized to include additional delinquent rent; auditors can verify that tenant ledgers are credited with the OHCS relief as well as the ownership write-off)

E) Owner write-off occurs after any payment plan is satisfied (i.e. if a resident must pay [\$50] per month for up to [12] months, the write-off occurs afterwards. This incentivizes residents to continue payments of future rents and a small portion of back rents.)



**Community
Development
Partners**

Bradford Long

Director, Asset Management

C: (267) 972-3529

[3416 Via Oporto - Ste 301](#)

[Newport Beach - California](#)

brad@communitydevpartners.com

www.communitydevpartners.com



*Housing Oregon
Board members:*

July 31, 2020

*Sheila Stiley,
Board chair – NW
Coastal Housing*

Julie Cody
Director of Affordable Rental Housing
Oregon Housing & Community Services
725 Summer St NE, Suite B
Salem, OR 97301

*Diane Linn,
Vice-chair - Proud
Ground*

*Travis Phillips,
Secretary –
Catholic Charities
of Oregon*

RE: Draft Affordable Rental Housing COVID Response Fund

Dear Mrs. Cody:

*Trell Anderson,
Treasurer –NW
Housing
Alternatives*

Thank you for seeking feedback from owners and operators of affordable housing organizations on the draft COVID Response Fund. Feedback from Housing Oregon members was solicited and discussed at our July meetings of the Portland Metro Policy Council, Rural Policy Council and Board of Directors meeting July 20. I and numerous members also participated in the Housing Alliance Development, Land Use and Preservation meeting your team joined to discuss this topic.

*Rachael Duke -
Community
Partners for
Affordable Housing*

*Ernesto Fonseca -
Hacienda CDC*

Lead with objective to stabilize households in need

Housing Oregon recommends the fund needs to be clear the objective is first and foremost to stabilize households in need as a result of the COVID-19 economic downturn, and second, to stabilize project operations – paying salaries, debt service, etc. – which follows when households are stabilized.

*Nkenge Harmon
Johnson – Urban
League of Portland*

*Sean Hubert-
Central City
Concern*

Equity and Racial Justice, Rural Communities

Housing Oregon urges OHCS to align the fund with values it has prioritized in the Statewide Housing Plan including Equity and Racial Justice as well as Rural Communities. These priorities should be strengthened to ensure culturally specific and smaller rural-based organizations should receive targeted set-aside funds. Alternatively, language could be adapted to identify communities disproportionately impacted by homelessness and poverty, rather than being specific to race or ethnicity. In addition, while the draft proposal recognizes some communities do not have rent assistance resources available, there should be an explicit set-aside recognizing the limited availability of resources rural and smaller organizations have access to.

*Richard Morrow –
Columbia Cascade
Housing Corp.*

*Arielle Reid –
NeighborWorks
Umpqua*

*Lisa Rogers –
CASA of Oregon*

P.O. Box 8427, Portland, OR 97207

Details on how to operationalize the program

Housing Oregon members are concerned about details on how OHCS plans to operationalize the program recognizing the extraordinary limited time frame provided to develop and complete implementation by December 2020. We are aware multiple meetings were held with investors and lenders to seek their input. If requested, we are ready to help mobilize additional dialogue with owners and operators, those with on-the-ground experience who will be responsible for executing loan agreements.

Fund should be accessible to OHCS' complete portfolio

Housing Oregon's understanding is the fund excludes manufactured housing cooperatives and homeownership organizations as possible recipients of these funds. Many cooperative residents are struggling to make their pad rents. Since all of the 17 nonprofit manufactured housing cooperatives formed to date and homeownership organizations such as Habitat for Humanity chapters, Proud Ground and DevNW, have received funding from OHCS, we request organizations with homeownership programs have access to the fund. If the department decides to deny such organizations access to the funds, please state clearly on all solicitations the reason for their ineligibility.

Reconsider requirement and/or amount of leverage required

Housing Oregon recommends OHCS reconsider the requirement and/or amount of leverage required or prioritized for success in a competitive application. This requirement specifically disadvantages the properties and residents most at risk, including those with HUD and Rural Development funding, which specifically disallows operating reserves and/or requires operation at break-even cash flow.

Prioritizing nonprofit owners and operators

Housing Oregon recommends OHCS prioritize non-profit owners and operators for the fund. We believe there is value in the fact that any surpluses that have accrued to nonprofits over the years are 100% reinvested back into community since they are mission-driven organizations. While for-profit owners are valuable partners in developing affordable housing, any of their surpluses generated over the years could be paid out to private individuals/shareholders that own them. Those are resources that are not reinvested back into the community.

Additional comments mirror feedback already provided by Travis Phillips, with Catholic Charities of Oregon/Caritas Housing and a Housing Oregon Board member:

Ensure application is simple and easy to navigate

Organizations and/or projects most at risk may also be those with limited staff capacity for a competitive application with arduous application requirements. Ensuring an application is simple and easy to navigate will help ensure small, rural, and culturally-specific organizations—and especially residents of their housing—are not unintentionally disadvantaged in this application.

Utilize a Vulnerability Index to prioritize projects most at risk

As discussed in the July 22 Housing Alliance meeting, a Vulnerability Index could be easily defined to prioritize projects most at risk. This might consider projects with low debt service

coverage, low per-unit cash flow, a higher percentage of rent arrearages and/or a higher concentration of Residents of Color.

Limit further tenant burden to prove need is COVID-related

There are multiple mentions of this assistance as being intended for tenants who have experienced COVID-related impacts and can't pay rent. This is understandable given the source of these funds, but the burden of proof should not be borne by residents if possible. It sounds like OHCS already has this in mind, and we would encourage OHCS to retain the ability for owner/operators to confirm that the impacts are COVID-related without further tenant burden.

Resist temptation to be suspicious of residents needing assistance

Residents are understandably scared of losing their housing and are making incredibly difficult decisions to balance keeping food on the table *and* a roof over their head. We must trust that the overwhelming majority of residents in need value this assistance as a last resort. The final proposal must not ask what the draft proposal does, *“How can we deploy these resources and not dis-incentivize rent payment by any household that is able?”*

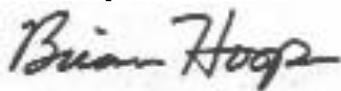
Ensure forgiveness does not impact residents' ability to access other benefits

While we believe OHCS has already considered some potential unintended consequences for residents, it is important to ensure any forgiveness does not impact residents' ability to access other benefits.

Housing Oregon appreciates OHCS' leadership to quickly develop a proposal for implementing this fund and thanks OHCS for inviting owners and operators of affordable housing to provide feedback. As mentioned earlier, we welcome OHCS' continued communication with on-the-ground organizations that will be delivering these resources to ensure continued housing stability for those disproportionately impacted by the COVID-19 related economic downturn.

Please feel free to contact me if you have questions at 503-475-6056

Sincerely,



Brian Hoop
Executive Director
Housing Oregon



July 31, 2020

Dear Housing Stability Council:

We thank Oregon Housing and Community Services (OHCS) for establishing the Affordable Rental Housing COVID Response Fund (ARH-CRF). The problem this fund was created to address is very real, and we applaud the Council for seeking a solution.

However, the draft framework established by OHCS does not align with the Statewide Housing Plan's goal of Equity and Racial Justice. We believe it is time for OHCS to actively pursue this goal by acknowledging the unique value, experience, and knowledge which culturally specific organizations provide to communities of color.

Communities of color are disproportionately impacted by COVID-19, even as they continue to face long-standing disparities in economic opportunity, housing stability, and many other factors. Latinx residents in Oregon are three times as likely to contract COVID-19 as white residents, due in part to a large population working in front line essential work such as farm work (including processing plants and aqua culture), sanitation, and the medical fields. Spikes among farmworkers around the state are particularly alarming. As of July 27th (per Oregon Health Authority data), 38% of the 17,000 positive cases of the virus in Oregon are attributed to Latinx residents. This does not take into account those who chose not to report their ethnicity. The Latinx community makes up 13.8% of Oregon's population according to US Census data, which highlights how this virus is having a disparate impact on these families. The latest spike in cases have centered around Multnomah, Marion, Washington, Clackamas, Umatilla, Malheur, Union, and Yamhill counties, which include urban and rural communities.

On behalf of the communities we serve, we request that OHCS prioritize their goal of Equity and Racial Justice. These funds must be used to address the disparities being experienced in communities of color. As culturally specific affordable housing organizations that serve communities of color, we represent diverse, low-income individuals and families across the state; communities that include immigrants, agricultural workers, and individuals who do not speak English.

In helping meet OHCS's goal of increasing resources to communities of color and collaborating with culturally specific organization, we request that OHCS create a \$10 million set-aside in the ARH-CRF funds to support culturally specific organizations serving communities of color and/or housing projects that serve farmworkers. This set aside ensures that the two priority goals specified for the ARH-CRF—stabilizing affordable housing projects and stabilizing low income households—are met in a way that benefits all communities and advances OHCS's goal of Equity and Racial Justice for the state of Oregon and serves one of the most vulnerable communities in our essential workforce

We believe it is important that the Housing Stability Council specifically prioritize ARH-CRF funds for affordable housing communities that provide housing to farmworkers across the state. A set-aside for culturally specific housing organizations is a step in the right direction for meeting Oregon’s goal of Equity and Racial Justice, but a further priority should be placed on farmworker housing. Farmworkers, as essential workers in an industry in which social distancing is not often possible or enforced by employers, have seen alarmingly disproportionate rates of COVID-19 compared to the general population. The service that these workers perform touches the lives of all Oregonian citizens, both directly and indirectly, and more must be done to elevate and stabilize their living conditions.

We further request that OHCS and the Housing Stability Council advocate with the state legislature to address regulated affordable housing with funding from USDA’s Rural Development program, but without direct investments from OHCS. These properties serve low-income residents who are just as deserving of support from the federal funds approved in the CARES act as residents in other affordable housing properties across the state.

Finally, we request that community based, non-profit owned affordable housing organizations be given priority for funding and support from the ARH-CRF program. These organizations are most likely to ensure that resources will serve those most in need and will also focus on stabilizing locally based organizations during this crisis.

We thank the Housing Stability Council for their work on behalf of culturally specific affordable housing organizations in Oregon and for the opportunity to submit this feedback.

Signatories



Maria Guerra, Executive Director
Farmworker Housing Development Corporation



Nathan Teske, Executive Director
Bienestar



Peter Hainley, Executive Director
CASA of Oregon



Ernesto Fonseca, CEO
Hacienda CDC

DETWEILER Natasha * HCS

From: Sarah Schubert <SSchubert@humansolutions.org>
Sent: Thursday, July 30, 2020 6:48 PM
To: ARH.HCS * HCS
Subject: Feedback on COVID Relief Fund

Human Solutions appreciates OHCS's willingness to take comments on the proposed Coronavirus Relief Fund. Below are our comments. Please let us know if you have any questions.

- We are concerned that asking owners to propose their own leverage ratio may encourage a “race to the bottom” with projects desperate to recover any amount of income lost proposing greater leverage ratios and other projects trying to keep up. OHCS should either A) set scoring criteria that include specified ratios attached to scaled, specified scores, or b) set a minimum leverage ratio (this could be different for different kinds of projects) and allow projects to go higher, ie forgive more rent, with no impact to their eligibility or score. Otherwise we are concerned that the focus on projects that can grant higher leverage ratios will end up prioritizing newer projects with higher set asides that are more financially stable which are the ones that need less help from OHCS.
- OHCS should allow more financially distressed projects to receive comparable consideration as less distressed properties for lower leverage ratios; as in, OHCS should consider the financial status of a project when determining how competitive its application is. Otherwise, resources may go to projects with less overall financial need that are less in need of help.
- The proposed leverage ratios, ranging from 60 to 80 cents on the dollar, will be difficult for the majority of our projects to commit to.
- Alternative measures to consider and prioritize as a way to ensure those most heavily impacted by COVID (communities of color) are served by these resources:
 - Ratio of max rent to actuals (prioritize projects with low rents)
 - Number of rent burdened households
 - Low operating cash and operating deficit reserve
 - Projects in historically Black neighborhoods
 - Projects with larger representation of BIPOC households
 - Projects in under-resourced areas/QCTs
- Project size should not be considered relevant; the amount of assistance can be scaled up or down based on number of units.
- If resources cannot be given to every household in the building (for example, if OHCS does not allow voucher holders to receive assistance), then there should not be a property-wide eviction moratorium.
- The proposal asks the question, How can we deploy these resources and not dis-incentivize rent payment by any household that is able?
 - The repayment period ends 6 months after the rent deferral period ends. Funds need to be LENT to projects by year end. Allow projects to withhold debt forgiveness until the end of the repayment period. Then, allow projects to repay any amount that was repaid by a household to satisfy an equal amount of the loan.
 - For example:
 - Project has \$10,000 outstanding rents and receives an award with 85% leverage ratio, plus a 5% buffer -- \$9,000.
 - The project uses these funds for operating expenses, but does not forgive balances until the end of the 6 month repayment period.
 - Some households repay their balance by the end of the 6 month repayment period, in the total amount of \$3,000.
 - The project repays \$3,000 of the funding back to OHCS, reducing funding award to \$6,000.

- The project forgives the remaining \$7,000 in household debt, bringing leverage ratio to 85%.
- Any funding that goes back to OHCS is used to establish a continuing rental & damages assistance fund.
- OHCS is suggesting prioritizing projects that have rental work out plans but in Multnomah County, we aren't allowed to require tenants to enter into workout plans so it doesn't seem like that should be a criteria for prioritizing projects.
- Given the timeframe, we believe the application process and compliance framework need to be as straightforward and simple as possible. Please consider allowing one application for multiple projects.
- Please provide transparency on how funding awards are determined, where the money is awarded, how much returns to OHCS and where the funding goes after that.
 - Clear, specific scoring criteria – not just a list of general priorities
 - Public reports on organizations and projects that were given awards, and how those projects scored
 - Public reports on loan repayment and future allocation of funds
- When OHCS comes up with its scoring method, it should test the criteria on several projects to determine if the result is as intended.

Thanks,
Sarah

Sarah Schubert
Director of Housing

Pronouns: She/Her/Hers

Human Solutions
12350 SE Powell Blvd.
Portland, OR 97201
917-952-0468 (mobile)
sschubert@humansolutions.org
www.humansolutions.org

Human Solutions: Building Pathways Out of Poverty

CONFIDENTIALITY NOTICE: The information contained in this e-mail is intended only for the use of the individual or entity to which it is addressed, and may contain information that is privileged, confidential and exempt from disclosure under applicable law. If you are not the intended recipient, any dissemination, distribution or copying of this e-mail is strictly prohibited. If you have received this e-mail in error, please notify us immediately by replying to this email, and delete or destroy all copies of the original message and attachments thereto.

DETWEILER Natasha * HCS

From: Erik Liseth <ELiseth@innovativehousinginc.com>
Sent: Wednesday, July 15, 2020 3:58 PM
To: ARH.HCS * HCS
Subject: Feedback - \$20m Landlord rent assistant loan

Follow Up Flag: Follow up
Flag Status: Flagged

Thank you to Natasha for running the call this afternoon. I wanted to provide feedback and advocacy for allowing Landlords to use the \$20m in assistance funds for commercial tenant rent arrearages, as well as residential. Considering the Governor's moratorium includes both residential and commercial, it seems to make sense that both would be available for assistance. Many of our commercial tenants applied for other types of assistance on their own accord without success. Business types are barbershop, restaurant, nightclub, bookstore, and retail. Furthermore, most of our commercial tenants experiencing business closures or interruptions are owned by persons of color.

As an example of impact to our portfolio, we have three such buildings with commercial businesses facing rent arrearages, all under contract with HCSD. Total arrearages factoring six businesses in the three sites equals just over \$65,000 from March through July 2020. All of these sites rely on commercial rent for operations in order to properly maintain and service the buildings and residents.

Please include the ability for Landlords to apply loan funds to both commercial and residential arrearages.

Thank you,

Erik Liseth (he, him, his)
Asset Manager

Due to COVID-19, IHI staff is working remotely. Please do not send overnight, special delivery, or Fed Ex packages to our office as no one is there to receive them. If you need to send overnight, please use this address: 3439 NE Sandy Blvd. #507, Portland, OR 97232. For all other mail please continue to use our regular mailing address and it will be forwarded to us. Thank you!

Innovative Housing, Inc.
219 NW Second Avenue
Portland, OR 97209
503-442-3315 (cell)
503-226-2509 fax
www.innovativehousinginc.com

Like us on facebook!! 

Link your [Fred Meyer Rewards](#) card to Innovative Housing, Inc. and they will donate cash to our programs. Find us by name or # 86076.

July 31, 2020

Comments to Oregon Housing & Community Services
RE: COVID Response Fund
Submitted to: ARH.HCS@oregon.gov

REACH appreciates the opportunity to provide feedback on implementation of the COVID Response Fund. REACH's Advocacy Committee, including residents of affordable housing, participated in the formulation of this response.

The proposed OHCS Response Fund has two stated goals – to stabilize housing projects and to stabilize households. REACH encourages OHCS to re-frame these goals and outcomes more clearly. **REACH believes the ultimate outcome for the COVID Response Fund is prevention of homelessness.** With this outcome in mind, we advocate for prioritizing resources to those projects with the greatest concentrations of de-stabilized and vulnerable households.

REACH also urges OHCS to publicly recognize that the COVID Response Fund, even combined with other sources of rent relief, is inadequate to meet the scale of need. COVID19 has triggered an economic crisis that will continue to destabilize households and threaten housing stability for many more months and likely years to come. **While the COVID Response Fund is an important relief effort, OHCS and state leadership should strongly support more fundamental solutions such as ongoing universal housing subsidies and make this advocacy visible at the same time as temporary programs are implemented.**

REACH advocates for prioritizing the COVID Response Fund to projects with highest concentration of de-stabilized and/or potentially vulnerable households, measured by:

- Percentage of rent that is in arrears (i.e. unpaid rents April through August as percentage of total possible rent).
- Percentage of households with rent arrearage.
- Percentage of households with members who identify as people of color.
- Percentage of households with members who are disabled and/or over age 50.

REACH advocates for giving priority to non-profit and culturally specific sponsor organizations in the application process:

Nonprofits (501c3) owners/sponsors of affordable housing:

Non-profit sponsors with 501 -c-3 status should receive priority in application process over for-profit sponsors. Non-profit sponsors are required to re-invest all excess cash flows or earned income into mission activity. For-profit sponsors have ability to distribute excess cash/income to private owners that may not be directed to mission activity. It is more likely that non-profits will have surplus resources already being reinvested in mission activity to help prevent homelessness. On the other hand, for-profit sponsors may have distributed cash to its private owners in the past and there is no guarantee that this distributed cash would be contributed back to prevent homelessness.

Therefore, OHCS should either:

- Provide outright preference in application process for non-profit sponsors.
- Or
- Require a significantly higher leverage ratio as a baseline for for-profit sponsors.

Culturally specific organizations:

Priority should be given to culturally specific organizations that center communities impacted by structural barriers and responding to disparate impacts. An outright priority in the application for culturally specific organizations is an effective way to ensure resources are prioritized to communities that have been systematically under-served by public systems.

REACH opposes the use of “leverage ratio” in a competitive award process:

Use of leverage ratio could favor larger sponsors at expense of smaller organizations, including culturally specific organizations and place-based sponsors. This would create significant equity concerns and should not be used. REACH advocates against using leverage ratio as a basis for ranking applications and making competitive funding decisions. Competitive funding decisions should prioritize organizations with the strongest track records of community responsiveness and homelessness prevention. If a standard leverage ratio is established across the board, then OHCS should consider adjusting the standard based on organizational size.

Thank you for considering our comments. The contact person at REACH for any follow up communication or questions is Dan Valliere, dvalliere@reachcdc.org, 503-519-2033.

DETWEILER Natasha * HCS

From: Suzanne Veaudry <suzanne@pcrihome.org>
Sent: Thursday, July 23, 2020 12:28 PM
To: ARH.HCS * HCS
Subject: RE: 07-21-2020-Technical-Advisory-COVID-Response-Fund

Follow Up Flag: Follow up
Flag Status: Flagged

Hi Mitch,

I am trying to figure out if PCRI would be eligible for these funds. This document specifically refers to “OHCS Affordable Rental Housing project operations”. Does this mean only projects that have received LIFT or other OHCS funds are eligible? If so, this would eliminate this source for us. PCRI is the largest African American low income housing organization in Oregon and has historically had difficulty obtaining funds from OHCS for development and maintenance of our low income properties. We are working to alter policies to make our housing portfolio eligible for funding, but we have not yet completed this. That being said, PCRI has been significantly affected by COVID as many of our residents have not been able to pay rent and we are not able to charge late fees, this has especially impacted our ability to pay staff (we have reduced hours/salary of our staff), had delayed construction and are in danger of defaulting on our loans. Additionally, we are concerned for our tenants ability to pay back rent arrearages and as this loan allows for covering those costs, it would be ideal for PCRI. I really hope we would be eligible.

Prioritizing “- Projects with a greater “leverage ratio”; that are willing to forgive a greater portion of rent arrearages – to loan amount? (i.e., a project that will accept 60 cents for every \$1 dollar in rent they forgive would be given priority over one that requires 90 cents for every \$1 dollar owed in rent)” would disadvantage organizations with less capital or resources and is not a method we would feel is not equitable.

As a culturally specific organization, we would support the culturally specific set aside.

Thanks for your work on this program.

Best,

Suzanne Veaudry Casaus
Financial Education/IDA Specialist



6329 NE Martin Luther King Jr. Blvd.

Portland, OR 97211

T: (503) 288-2923 x122 | F: (503) 288-2891 | C: (971) 341-6048

www.pcrihome.org

www.pathway1000.org



[@PCRIHome](https://twitter.com/PCRIHome)



[@pcrihome](https://www.instagram.com/pcrihome)



[@PCRIHome](https://www.facebook.com/PCRIHome)

From: ARH.HCS * HCS <ARH.HCS@oregon.gov>
Sent: Tuesday, July 21, 2020 12:20 PM
To: Suzanne Veaudry <suzanne@pcrihome.org>
Subject: RE: 07-21-2020-Technical-Advisory-COVID-Response-Fund

Hi Suzanne,

Thank you for letting us know about that! We sent an updated version of the email back out as well, but here's the correct link: <https://www.oregon.gov/ohcs/development/Documents/TAs/ARH-COVID-Response-Fund-DRAFT-for-Input.pdf>

Thanks,

Mitch

Mitch Hannoosh | Operations and Policy Analyst

Affordable Rental Housing Division
Oregon Housing and Community Services
503.986.2038

From: Suzanne Veaudry <suzanne@pcrihome.org>
Sent: Tuesday, July 21, 2020 10:54 AM
To: ARH.HCS * HCS <ARH.HCS@oregon.gov>
Subject: Fw: 07-21-2020-Technical-Advisory-COVID-Response-Fund

Hi,
I am interested in learning more about this program. The link requires a login. How do I obtain this information?
Suzanne Veaudry Casaus
PCRI

From: Oregon Housing and Community Services <hcs.noreply@oregon.gov>
Sent: Tuesday, July 21, 2020 10:44 AM
To: Suzanne Veaudry <suzanne@pcrihome.org>
Subject: 07-21-2020-Technical-Advisory-COVID-Response-Fund

Having trouble viewing this email? [Click here](#)

You are subscribed to received Technical Advisories from Oregon Housing and Community Services.

Technical Advisory



Oregon Housing and Community Services

July 21, 2020

Re: 2020 Affordable Rental Housing COVID Response Fund, Seeking Input

Dear Partners,

I am reaching out to seek your input on a potential delivery structure for relaying resources to projects within our portfolio that are facing operational challenges in light of COVID-19 related nonpayment of rent. OHCS received \$20 million in federal Coronavirus Relief Funds through the [Oregon Legislature](#) to launch this program.

The goal for these resources is to both stabilize OHCS Affordable Rental Housing developments as well as the tenants living in them. This program is intended to work directly with affordable rental housing owners and management.

Coronavirus Relief Funds must be spent before the end of the year. Given the quick delivery timeline, we have prepared a program overview and related questions for input. You can find this document [HERE](#).

We would appreciate any time you have to review this concept and provide feedback. Please submit your comments via email to ARH.HCS@oregon.gov by July 31st.

Sincerely,

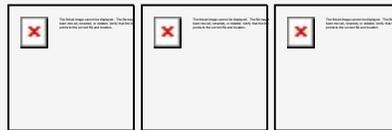
A handwritten signature in cursive script that reads "Julie V. Cody".

Julie V. Cody
Director of Affordable Rental Housing



Oregon Housing and Community Services
North Mall Office Building
725 Summer Street NE, Suite B, Salem, OR 97301-1266
www.oregon.gov/ohcs

Follow us on Social Media



Oregon Housing and Community Services,
725 Summer St NE Ste B, Salem, OR 97301-1266

[SafeUnsubscribe™ suzanne@pcrhome.org](#)

[Forward this email](#) | [Update Profile](#) | [About our service provider](#)

Sent by hcs.noreply@oregon.gov powered by



[Try email marketing for free today!](#)

DETWEILER Natasha * HCS

From: Taylor Smiley Wolfe <Taylor.SmileyWolfe@homeforward.org>
Sent: Wednesday, July 22, 2020 5:04 PM
To: ARH.HCS * HCS
Cc: Tonya Evans
Subject: COVID Response Fund Input

Follow Up Flag: Follow up
Flag Status: Completed

Hi Julie and OHCS Team,

We appreciate the opportunity to provide feedback on the agency's proposed COVID Response Fund program design.

Please find our comments below:

- We strongly support prioritizing projects with higher % of unassisted units because tenants who have been impacted by COVID and aren't able to do an income certification to have rent reduced are most likely to have unaffordable rent arrears. We are defining "unassisted units" as units without project based or tenant based subsidy.
- We generally support the creation of urban and rural set-asides but suggest that OHCS prioritize BIPOC households because BIPOC communities have been most impacted by COVID. The PHB program design would be a helpful reference point.
- We don't think it's necessary to identify "large" and "small" projects. Owners/agents should be able to support the need with COVID-related data regardless of project size.
- We support the intent of requiring providers to commit to a COVID related prohibition on evictions during the loan period. At Home Forward, we have been discussing the difference between households who can't afford arrears but could otherwise afford their rent and folks who won't be able to afford their Oct 1 rent, let alone arrears. Is OHCS envisioning that the eviction moratorium for the duration of the loan would be specific to arrears between March and Sept 30th or any COVID related non-payment, including Oct-end of loan term?
- Reporting should be incorporated in to existing compliance and financial reporting platforms to the greatest extent possible (i.e. WCMS, ProCorum)
- As the intent of these funds is to address COVID impact, we strongly support separating projects struggling pre-COVID from those that have been impacted due to COVID
- If owners/agents are incentivized to waive unpaid rent as a means to satisfy the loan, what happens if some of the households who couldn't pay rent have vacated units on their own?
- And this will come as no surprise, but the fewer administrative constraints, the better.

Thank you for your work on this program.

Best,

Taylor Smiley Wolfe
Director of Policy and Planning
Pronouns: she/her/hers ([learn more](#))

135 SW Ash Street
Portland, Oregon 97204
tel: 503.802.8506
cell: 503.957.8760
tty: 503.802.8554
fax: 503.802.8312
web: www.homeforward.org

An accurate census count helps secure necessary funding and resources for our state, including housing and services for vulnerable communities. Remember to complete your census online, by mail, or by phone.

Census deadline has moved to 10/31/2020



Confidentiality Notice: This communication may contain privileged or other confidential information exempt from disclosure. If you are not the intended recipient, you may not use, copy, disseminate or retain this message. Please delete the copy you received and alert the sender to the transmission error. Thank you.



DETWEILER Natasha * HCS

From: Taylor Smiley Wolfe <Taylor.SmileyWolfe@homeforward.org>
Sent: Monday, August 24, 2020 2:59 PM
To: ARH.HCS * HCS
Cc: Tonya Evans
Subject: Home Forward Feedback

Hello Natasha and Julie,

Thank you so much for your hard work on this framework and for the opportunity to provide feedback. Home Forward would like to submit the following comments on the “Draft for Input: COVID Response Fund”.

Suggestions:

- Please consider partial funding of applications if the program is significantly oversubscribed.
- As this funding is intended to support affordable housing providers struggling as a result of COVID-19, OHCS should differentiate between projects struggling pre-COVID and those struggling as a result of COVID in all elements of the program.
 - Specifically, we believe that prioritizing projects in the “operating reserve” category even if they had low operating reserves pre-COVID undermines the intent of the program. Projects with low operating reserves as a result of COVID should be prioritized.
- OHCS should consider looking at the demographics of the project, or the community served by the provider at large, as opposed to the census tract.
- Given the shortage of available funding, and the desperate need in the community, we urge you to include the \$6 million in this round of applications
- We suggest increasing the rent burdened level from 30 to 50% to more effectively prioritize projects serving people who are more vulnerable to not being able to afford their rent.

Clarifying questions:

- If provider would accept a leverage ratio of <100%, is the expectation that 100% of arrearages are waived or could the provider collect remaining arrearages via repayment plans?
- Is the \$7 million set-aside for:
 - A. culturally specific providers and culturally specific general partners,
 - B: Culturally specific providers and non-culturally specific general partners
- Could you provide additional clarification to describe the “AG/Culturally Specific” set-aside

Again, thank you so much for your work on this and the opportunity to provide our feedback. We appreciate your work and willingness to consider our suggestions.

Best,

Taylor Smiley Wolfe
Director of Policy and Planning
Pronouns: she/her/hers ([learn more](#))

135 SW Ash Street
Portland, Oregon 97204
tel: 503.802.8506
cell: 503.957.8760
tty: 503.802.8554
fax: 503.802.8312
web: www.homeforward.org

An accurate census count helps secure necessary funding and resources for our state, including housing and services for vulnerable communities. Remember to complete your census online, by mail, or by phone.

Census deadline has moved to 9/30/2020



Confidentiality Notice: This communication may contain privileged or other confidential information exempt from disclosure. If you are not the intended recipient, you may not use, copy, disseminate or retain this message. Please delete the copy you received and alert the sender to the transmission error. Thank you.





Date: September 4, 2020

To: Housing Stability Council
Margaret Solle Salazar, Executive Director

From: Amy Cole, State Development Resources Manager
Natasha Detweiler-Daby, Assistant Director Planning and Policy
Julie V. Cody, Director Affordable Rental Housing

Re: Year-Two Framework for Permanent Supportive Housing

Motion: Approve the framework for relaying PSH Initiative Resources as presented [or with noted revisions] in 2021.

Background:

The 2019 Oregon Legislature committed resources to establish the OHCS Permanent Supportive Housing effort. These resources included \$50 million in development capital as well as 500 slots of rent assistance and supportive services funding, in partnership with the Oregon Health Authority. In February 2019, Housing Stability Council (HSC) adopted the framework for the first-year pilot launch of our Permanent Supportive Housing initiative.

As discussed in the August HSC memo ([page 82](#)), at the September HSC meeting, we are asking Council to approve the plan laid out in this memo to work toward committing remaining development, rent assistance, and services funding. This works supports our Permanent Supportive Housing Statewide Housing Plan Priority; our five year goal was to fund 1,000 units and we are excited to report that we have already funded over 400 PSH units across the state!

Framework:

OHCS has approximately \$15 million in development capital, and nearly 300 slots of rent assistance and supportive services funds, available to commit to projects. With that lens, the framework for the second-year resources are built with the following priorities:



1. Continued reliance on PSH Institute training and technical assistance to ensure successful execution, which requires relationships and formal agreements among developers, service providers, and management entities.
2. Leveraging additional development resources to ensure the successful commitment of the remaining 321 spots of PSH project based rent assistance, and 294 OHA project-based supportive services slots.
3. Build upon alignments of federal resources to expand funding opportunities for PSH.

Framework Detail:

1. *Continued reliance on PSH Institute training and technical assistance to ensure successful execution, which requires relationships and formal agreements among developers, service providers, and management entities.*

OHCS is under contract with CSH to launch year-two of the Oregon PSH Institute; the application for participation in this cohort closed on September 2nd and is expected to launch in October 2020. In selecting teams to participate, CSH in partnership with OHCS and OHA, will prioritize culturally responsive service delivery structures, tenant voice, tribal representation, community need, and readiness to proceed.

Any project that receives PSH development funding, PSH project based rent assistance through OHCS, or project-based supportive services funds through OHA, will be required to attend a PSH Institute. While the first round of PSH resources were only offered to the first PSH cohort, our expectation (reflected in the balance of this framework) is that future resources will be made available more broadly through more of our funding opportunities.

- PSH Development Resources will be made available through a targeted PSH fund offering and will prioritize projects that have already been vetted through a PSH institute.
- PSH Rent Assistance and Services slots: will be made available through the PSH NOFA, as well as future 9% LIHTC NOFA, Veterans NOFA, and Small Project NOFA. These resources will be made available to any PSH effort that aligns with our PSH initiatives intent of serving those experiencing chronic homelessness. While these resources will be available to project teams that have not already been vetted through a PSH institute, the teams can be directed to future cohort placements to receive the needed training and technical assistance. If a team has already completed the Institute, but for a

different project than they receive resources for, OHCS will evaluate the need for training and technical assistance as part of a reservation condition.

2. *Leveraging additional development resources to ensure the successful commitment of the remaining 321 spots of PSH project based rent assistance, and 294 OHA project-based supportive services slots.*

With just \$15 million in dedicated PSH development resources available to offer in year-two, staff recommend expanding the opportunities for applicants to request commitment of the remaining 321 spots of PSH project based rent assistance and 294 slots of OHA project-based supportive service commitments. In examining upcoming funding opportunities it would be our hope, pending HSC and OHA approval, to make these resources available in our:

- Veterans development NOFA, planned for this fall and summer 2021
 - o This NOFA has already prioritized serving veterans experiencing homelessness and having units affordable to serve extremely low income households; extending PSH project based rent assistance and services funding would be a logical match.
- 9% LIHTC NOFA, planned for January 2021
 - o This NOFA is based on our Qualified Allocation Plan (QAP); the 2019 update of the QAP established deliberate preference for including PSH units.
- PSH NOFA, planned for January 2021
 - o Discussed below in detail; will provide an opportunity to apply for PSH Rent Assistance and Services slots alone or in combination with PSH Development Resources.
- Small Project NOFA, planned for summer 2021
 - o This NOFA focuses on small projects and rural areas, with a preference for serving extremely low income households. For some PSH projects, this could be the perfect fit if PSH project based rent assistance and services funding were available.

3. *Build upon alignments of federal resources to expand funding opportunities for PSH.*

The 2021 offering of the \$15 million remaining in dedicated PSH development resources needs to be made available in January 2021 in order to have projects committed in advance of the scheduled 2021 Article XI-Q bond sale. In order to ensure the ability to fund as many projects as possible, staff recommend we pursue updating our strategy for allocating National Housing

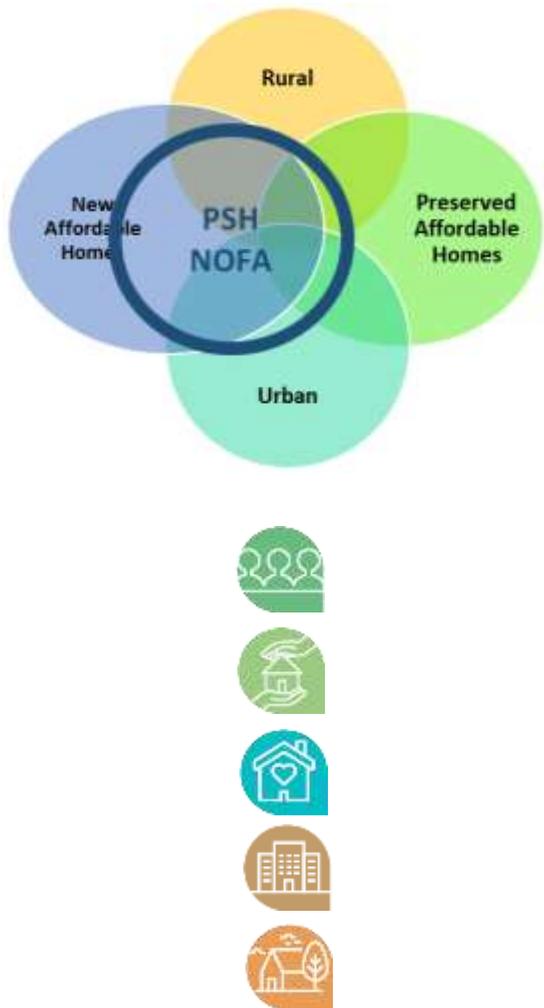
September 4, 2020
Year-Two Framework for Permanent Supportive Housing

Trust Fund resources as we work to update our 5 year Consolidated Plan which guides these resources.

On the following page, you can find a framework for these dedicated PSH Development Resources offering.

Fund Offering Permanent Supportive Housing (PSH) NOFA

Fund Offering	Permanent Supportive Housing (PSH) NOFA	
Development Type	PSH units serving those experiencing Chronic Homelessness in New / Acq/Rehab or Existing Publicly Supported Housing	
Geography	Split between Urban & Rural	
Subsidy Limits	<ul style="list-style-type: none"> - \$250 k per PSH unit; - PSH Project Based Rent Assistance and Services Slots - 4% LIHTC - OAHTC: \$3MM loan per project - Required participation in PSH Institute; preference for projects that have gone through the PSH Institute. 	
Scoring Principles	<ul style="list-style-type: none"> - Geographic Diversity; Tribal set-aside - Population targeting - Partnerships to support service to communities of color - Service package developed to meet needs of target populations - Location access and amenities - Financial Viability 	
Equity	<ul style="list-style-type: none"> - Affirmative Fair Housing Marketing - MWESB Construction Workforce Engagement - Resident Services; culturally responsive partnerships - Location Accessibility - Diversity, Equity and Inclusion (DEI) agreement, requirement 	





**OREGON HOUSING *and*
COMMUNITY SERVICES**

725 SUMMER STREET NE, SUITE B | SALEM, OR 97301
503-986-2000 | www.oregon.gov/OHCS

Date: September 4, 2020

To: Housing Stability Council Members;
Margaret Solle Salazar, Executive Director

From: Amy Cole, State Development Resources Manager
Natasha Detweiler-Daby, Assistant Director, Planning and Policy
Roberto Franco, Assistant Director, Development Resources and Production
Julie V. Cody, Director, Affordable Rental Housing Division

Re: LIFT Additional \$50 Million Recommendations

Motion: Approve the additional LIFT funding recommendations for the following projects:

- **53rd Flats in Corvallis, \$9,300,000 in LIFT funds**
- **Colonia Paz II in Lebanon, \$15,425,000 in LIFT funds**
- **Shore Pines at Munsel Creek in Florence, \$10,075,000 in LIFT funds**
- **USA Powell in Portland, \$15,200,000 in LIFT funds**

At the upcoming Housing Stability Council meeting, we will be presenting recommendations for funding four projects from the most recent LIFT NOFA with the additional \$50 million in LIFT made available through SB 5721 in the August 10 Special Legislative Session. All of the projects being recommended were submitted and scored as part of the 2020 LIFT NOFA process and are eligible for funding. Detailed information regarding each project can be found in the one-page summaries following this cover memo. The recommendations total \$50 million and follow the LIFT set-aside in the NOFA of 50% for urban projects (\$24,500,000) and 50% for rural projects (\$25,500,000).

Funding Recommendation:

All together, these projects will create 441 units of new affordable housing in four communities across the state, bringing the total number of units funded through LIFT in 2020 to 1,574.

Projects Serving Urban Communities

Project Name	County	Total Units	Sponsor
53 rd Flats	Benton	100	Commonwealth
USA Powell	Multnomah	165	USA Properties Fund
Total		265	



Projects Serving Rural Communities

Project Name	County	Total Units	Sponsor
Colonia Paz II	Linn	109	FHDC
Shore Pines at Munsel Creek	Lane	67	Northwest Housing Alternatives
Total		176	

See attached project summaries for additional information.

Statewide Housing Plan

With a focus on adding affordable rental units to the housing stock, specific scoring and funding set-aside for rural proposals, and its concentration on creation of housing opportunities for historically underserved populations, MWESB contracting, and DEI agreements, the LIFT Rental program and resulting housing meet the following Statewide Housing Plan priorities:

- Affordable Rental Housing: LIFT adds new affordable rental units to the affordable housing stock
- Rural Communities: LIFT has a soft 50% set-aside for rural developments
- Equity and Racial Justice: LIFT requires that all projects have detailed specific actions to engage with communities of color, all sponsors sign a diversity, equity, and inclusion agreement, and have a plan to engage with MWESB organizations.





OREGON HOUSING *and*
COMMUNITY SERVICES

725 SUMMER STREET NE, SUITE B | SALEM, OR 97301

503-986-2000 | www.oregon.gov/OHCS

SUMMARY			
Project Name:	53 rd Flats		
City:	Corvallis	County:	Benton
Sponsor Name:	Commonwealth Development Corporation		
Urban/Rural :	Urban	Total Units	100
LIFT Request:	\$9,300,000	Units by Size & Affordability:	5 2-BR at 30% AMI 5 3-BR at 30% AMI 18 2-BR at 50% AMI 18 3-BR at 50% AMI 37 2-BR at 60% AMI 17 3-BR at 60% AMI
4% LIHTC:	\$742,236	# Rent Assisted Units:	none

PROJECT DETAILS	
Project Description:	53 rd Flats will be the first large scale affordable housing project in Corvallis and the first new construction tax credit development since 2017. This project will feature a mix of 2 and 3-bedroom units to serve families; located in a high opportunity part of Corvallis and within walking distance of a major grocery store and served by high performing schools.
Partnerships to Serve Communities of Color:	The sponsors for 53 rd Flats are partnering with Community Services Consortium (CSC) for resident services which are designed to keep tenants housed, grow their educational and economic prospects, and gain access to health care. CSC partners with many different agencies in the region including Casa Latinos Unidos de Benton County (CLUBC), LBCC Multicultural Center, Hispanic Advocacy Council of Linn and Benton Counties, and the NAACP of Linn and Benton Counties. CSC Case Managers working in Benton County have had excellent success reaching underserved communities. Developers have also conducted direct outreach to culturally specific efforts including the partnership between the school district and Casa Latinos Unidos, in the Corvallis School District Welcome Center; in addition to the Siletz Tribe and Milestones Recovery in Corvallis.
MWESB Target:	20% of construction contracts.
Alignment with Statewide Housing Plan:	<ul style="list-style-type: none"> Equity and Racial Justice Affordable Rental Housing
The LIFT program requires that all project sponsors sign a Diversity, Equity, and Inclusion (DEI) agreement and engage MWESB organizations.	





**OREGON HOUSING *and*
COMMUNITY SERVICES**

725 SUMMER STREET NE, SUITE B | SALEM, OR 97301
503-986-2000 | www.oregon.gov/OHCS

SUMMARY			
Project Name:	Colonia Paz II		
City:	Lebanon	County:	Linn
Sponsor Name:	Farmworker Housing Development Corporation (FHDC)		
Urban/Rural :	Rural	Total Units	109
LIFT Request:	\$15,425,000	Units by Size & Affordability:	4 0-BR at 30% AMI 4 1-BR at 30% AMI 7 2-BR at 30% AMI 7 3-BR at 30% AMI 14 0-BR at 60% AMI 16 1-BR at 60% AMI 28 2-BR at 60% AMI 29 3-BR at 60% AMI
4% LIHTC:	\$8,548,930	# Rent Assisted Units:	none

PROJECT DETAILS	
Project Description:	Colonia Paz II is a 109-unit development with a mix of 0, 1, 2 and 3 bedroom units affordable to renters at or below 30% and 60% of area median income (AMI). The development will provide affordable housing to current farmworkers, former farmworkers and the Lebanon workforce.
Partnerships to Serve Communities of Color:	The concept for this project is informed by the needs of farmworkers who live in FHDC's other properties and the outreach conducted to many service organizations in the region, including the Lebanon School District, Linn Benton Community College, the Boys and Girls Club, Legal Aid, Samaritan Lebanon Health Center, Food Share of Linn Benton County, Community Services Consortium and many others. FHDC is a culturally specific housing provider and will offer culturally specific services to tenants of Colonia Paz II.
MWESB Target:	40% of construction contracts
Alignment with Statewide Housing Plan:	<ul style="list-style-type: none"> • Equity and Racial Justice • Affordable Rental Housing • Rural Communities



The LIFT program requires that all project sponsors sign a Diversity, Equity, and Inclusion (DEI) agreement and engage MWESB organizations.





**OREGON HOUSING *and*
COMMUNITY SERVICES**

725 SUMMER STREET NE, SUITE B | SALEM, OR 97301
503-986-2000 | www.oregon.gov/OHCS

SUMMARY			
Project Name:	Shore Pines at Munsel Creek		
City:	Florence	County:	Lane
Sponsor Name:	Northwest Housing Alternatives		
Urban/Rural :	Rural	Total Units	67
LIFT Request:	\$10,075,000	Units by Size & Affordability:	33 1-BR at 60% AMI 34 3-BR at 60% AMI
4% LIHTC:	\$6,035,180	# Rent Assisted Units:	31

PROJECT DETAILS	
Project Description:	Shore Pines at Munsel Creek is a 67-unit development with a mix of 1 and 3 bedroom units affordable to renters at or below 360% of area median income (AMI). In addition, the project has 31 units of project based rent assistance from the local housing authority that will further restrict 10 1-BR and 21 3-BR units at or below 30% AMI. Ten units will be set-aside to serve persons who are living with HIV/AIDS.
Partnerships to Serve Communities of Color:	NHA plans to partner with Homes for Good, Siuslaw Outreach Services, Sponsors, Inc., The Confederated Tribes of Coos, Lower Umpqua and Siuslaw Indians, the Oregon Health Authority, Oregon Housing Opportunities in Partnership Program, and Peace Health for this project.
MWESB Target:	20% of professional services contracts, 20% property management services contracts, and 30% construction contracts
Alignment with Statewide Housing Plan:	<ul style="list-style-type: none"> • Equity and Racial Justice • Affordable Rental Housing • Rural Communities
The LIFT program requires that all project sponsors sign a Diversity, Equity, and Inclusion (DEI) agreement and engage MWESB organizations.	





**OREGON HOUSING *and*
COMMUNITY SERVICES**

725 SUMMER STREET NE, SUITE B | SALEM, OR 97301
503-986-2000 | www.oregon.gov/OHCS

SUMMARY

Project Name:	USA Powell		
City:	Portland	County:	Multnomah
Sponsor Name:	USA Properties Fund/Northwest Housing Alternatives		
Urban/Rural :	Urban	Total Units	165
LIFT Request:	\$15,200,000	Units by Size & Affordability:	68 1-BR at 60% AMI 16 2-BR at 60% AMI 81 3-BR at 60% AMI
4% LIHTC:	\$19,463,559	# Rent Assisted Units:	none

PROJECT DETAILS

Project Description:	USA Powell is a 165 unit development with a mix of 1, 2, and 3 bedroom units affordable to households earning at or below 60% area median income (AMI)
Partnerships to Serve Communities of Color:	The project sponsors plan to partner with Hacienda CDC in order to provide culturally specific services to Latinx tenants. NHA has been completing outreach in this neighborhood and its communities through the NHA resident advisory council, resident services surveys, and recent projects, including connections with LBTQ (Sage), Immigrant (IRCO), African American (Urban League) and Latinx (Hacienda) organizations and constituencies. Additionally, Hacienda CDC has conducted extensive listening sessions and outreach around its other projects in the area which serve Latinx Communities.
MWESB Target:	20% of professional services contracts, 20% property management services contracts, and 30% construction contracts
Alignment with Statewide Housing Plan:	<ul style="list-style-type: none"> • Equity and Racial Justice • Affordable Rental Housing • Rural Communities

The LIFT program requires that all project sponsors sign a Diversity, Equity, and Inclusion (DEI) agreement and engage MWESB organizations.





Date: September 04, 2020

To: Housing Stability Council Members
Margaret Solle Salazar, Executive Director

From: Andrea Bell, Director Housing Stabilization Division
Sam Kenney, Homeless Services Policy Analyst

Re: COVID-19 Emergency Solutions Grant (ESG)

Purpose: To provide a briefing on ESG CV 2 funding process. No HSC decision to be made.

Background

On March 27, 2020, Congress passed the Coronavirus Aid, Relief, and Economic Security Act (CARES Act). The Act identified additional funding for the Emergency Solutions Grant (ESG) program to be utilized to prevent, prepare for, and respond to coronavirus among individuals and families who are experiencing homelessness or receiving homelessness assistance; and to support additional homelessness assistance and homeless prevention activities to mitigate the impact created by coronavirus.

ESG CARES Act funds were released in two phases. In the first phase, OHCS received \$6.7 million. These funds were rapidly deployed to Community Action Agencies (CAAs) through an amendment to the existing Master Grant Agreement. In the second phase OHCS received \$49.4 million dollars. This necessitated a new funding approach to meet the unprecedented need during the COVID 19 pandemic and provided OHCS an opportunity to add seats to the homeless services table to tackle new challenges.

With this in mind, OHCS sought and received flexibility in [HB 4304](#) around [allocating the CARES Act Emergency Solution Grants \(ESG\)](#). OHCS will provide \$7 million to our Community Action Agency partners and run a competitive process to allocate the remaining \$42.4 million ESG.

Building a more equitable Oregon requires every part of state government to work diligently to ensure that equity is integrated into every aspect of the state's COVID-19 response and recovery efforts and beyond. This new flexibility will allow OHCS to address disparities by directing resources for an equitably recovery that include culturally specific organizations. As a state agency, we have an obligation to examine how we can most responsibly and constructively serve all communities.

Allowable interventions

ESG funds may be used to support activities under the following program components (in addition to administrative costs):

- Street outreach
- Emergency Shelter



- Homelessness Prevention
- Rapid Re-housing
- Data Collection

These activities, in conjunction with community input and a focus on equity and racial justice, will form the foundation of all ESG CV projects.

ESG Program Goals

These resources will play a crucial role in addressing the needs of people experiencing homelessness during the COVID-19 pandemic, supporting the non-congregate shelter system, and bridging gaps in service delivery. COVID-19 does not affect all communities equally and people of color are more likely to experience the nefarious effects of the pandemic. With this in mind, OHCS aims to foster an equity and racial justice oriented response while maintain statewide investments under which ESG funds are leveraged to achieve the following goals:

1. Reimagine and strengthen Oregon’s shelter system under a non-congregate framework.
2. Incorporate community based organizations to expand the homeless services network and deepen community penetration.
3. Meet the needs of Oregon’s unsheltered and high needs populations first.
4. Place people into permanent housing by coordinating with other state and federal programs to optimize funds across all sources.

Role of the Continuum of Care

According to the HUD ESG Interim Rule, at 24 CFR 91.110, state ESG recipients (including OHCS) must consult with all CoCs in their geographic area in preparing both their homelessness strategy and plan for allocation of resources to address the needs of homeless individuals and families and persons at risk of homelessness. There are 8 HUD-designated CoCs covering the state.

A Continuum of Care is “a community plan to organize and deliver housing and services to meet the specific needs of people who are homeless as they move to stable housing and maximize self-sufficiency. It includes action steps to end homelessness and prevent a return to homelessness.” CoCs coordinate and provide a wide array of homeless services for Oregonians living within their region. Historically, OHCS has allocated all ESG funds directly to Community Action Agencies. Each CAA across the state has an existing relationship with the CoC serving its geographic area; in some cases the coordination is very strong and in other cases there may be opportunities to strengthen and further align strategy, best and promising practices and resources. All efforts to build on the existing work happening in communities while building a more coordinated system that intentionally includes culturally specific agencies.

Over the next several weeks OHCS has invited CoCs to participate in a consultation of the allocation and planning of the ESG CV 2 resources from the CARES act. The goals of these



discussions are to create a space where OHCS can engage with CoCs and discuss challenges, aspirations, feedback, and plans for ESG CV 2 funds in each community.

OHCS recognizes that coordination and collaboration between CoCs, OHCS, and ESG recipients ensures the most effective service delivery strategies and deepest understanding about the systems of assistance needed to address homelessness, and how respective funding streams can support provision of that assistance.

Subgrantee Selection Process

ESG-CV State Recipients are responsible for awarding funds to eligible service providers consistent with the following requirements:

- Adherence to a fair and open process that avoids conflicts of interest
- Utilization of equity-based and data driven decisions in funding interventions
- Consideration of community input to identify unmet needs
- Prioritization of activities that address the highest unmet needs, considering other available funding and system wide performance measures

Next Steps

OHCS staff are actively working to create a competitive NOFA to meet HUD ESG requirements and our statewide goals. OHCS staff will update the Housing Stability Council on their progress.

In adherence with HUD requirements all eligible projects will be required to:

- Participate in the local Coordinated Entry System.
- Collect and enter data into the Homeless Management Information System (HMIS) on all persons assisted and services provided with ESG-CV funds.
- Ensure that none of the funds are used to require people experiencing homelessness to participate in treatment or perform any other pre-requisite activities as a condition for receiving shelter, housing or other services.

HUD Technical Assistance has informed we are ahead of the national schedule in terms of making ESG allocations available; even so, we are balancing the need to be expeditious and strategic while leading with race. OHCS plan to return to council with details on this competitive process.

We will plan to return to the Housing Stability Council to provide information on plans for ESG as they are fleshed out, and to inform you of the feedback we receive from CoCs. We will seek feedback from the Council as we work to define goals and outcomes for this wave of ESG funding, including strategies for the provision of funds to culturally specific and culturally responsive organizations, and the most impactful homeless service strategies to prevent and address homelessness through non-congregate services during this crisis.





Date: September 4, 2020

To: Housing Stability Council Members
Margaret Solle Salazar, Executive Director

From: Andrea Bell, Director, Housing Stabilization Division
Brizna Garcia Homeless Services Section Program Analyst
Vicki Massey, Homeless Services Section Program Analyst

Re: Rental Market Resources – Update

Purpose: To provide a briefing on Rental Market Resources. No HSC decision to be made.

Background:

At the November 2019 council meeting, we brought the program framework for a new, one-time allocation OHCS received as part of House Bill 2006. Because of the tireless work of advocates and the legislature, OHCS received \$3 million to support and/or develop programs that build on successful strategies that help individuals obtain and retain housing through:

- Tenant education;
- Fair housing training for tenants and landlords;
- Technological innovations that help low-income individuals find and access available rental housing; and
- Other education, services or resources for low-income tenants and prospective tenants and for landlords who rent to low-income tenants.

Implementation Update:

The economic impact of COVID-19 has influenced the expediency at which these funds needed to be allocated, and the services that required concentrated resources. The needs of renters cannot be underestimated. Prior crises illustrate a pattern in which discrimination often increases during disaster. We see indicators of this through the increase in call rates and experiences reported through tenant hotlines and service referral systems.

OHCS' original plan was to issue a Request for Proposals (RFP) for the purposes listed above. The Council approved a framework with criteria for how to evaluate these applications. In light of COVID and the immediacy of the crisis, OHCS leadership made the decision to direct award some of the Rental Market Resources funds to two existing grantees: Fair Housing Council of Oregon and Community Alliance of Tenants. During the September council meeting, we plan to engage and update council on the technology investments that will be made through these investments.

We want the Council to be informed of how we invested these resources and how even in the midst of crisis, our investment stayed true to our agency's priorities.



Fair Housing Council of Oregon (FHC)

FHC is leveraging existing partnerships and expanding relationships with community-based and culturally specific organizations to provide services throughout the state. Partnerships include housing navigators collaborating with or operating within culturally specific organizations; tenant advocacy groups providing landlord-tenant education and outreach, and regional and statewide housing provider organizations or associations. FHC's goal is to:

- Strengthen knowledge about fair housing rights and responsibilities among housing consumers, providers, advocates, service providers, and jurisdictions;
- Improve the reporting of housing discrimination in rural communities;
- Expand access to legal resources, including private civil rights attorneys; and
- Increase advocacy of statewide public policy issues informed by local and regional needs.

Through this grant, FHC will be able to expand their services, which include:

- Delivering twice monthly fair housing-related trainings to community groups, and conducting monthly outreach to social service advocates and agencies, housing consumers and rental property owner associations;
- Disseminating fair housing information through appropriate community locations and access on-line via FHC's website;
- Attending local and regional stakeholder group meetings;
- Promoting local community events during Fair Housing Month;
- Conducting mass media events, as available;
- Providing direct access to housing discrimination hotline services for social service advocates and agencies and access to hotline services for housing consumers;
- Recruiting private civil rights attorneys to participate in FHC's private attorney pool; and
- Strengthening existing relationships with local stakeholders serving on regional Community Advocacy Teams.

Community Alliance of Tenants (CAT)

We invested in CAT to:

- Expand CAT's hotline service hours and number of hotline representatives to provide tenant education and renter's rights workshops across the state.
- Provide Tenant Leadership Council Captains to:
 - Strengthen long-term renter support efforts
 - Provide guidance on cultural approaches to tenant protection advocacy
 - Assist in managing rapid response grant assistance, outreach, education and tenant protection services
- Hire new staff that will support CAT's growth and expanded services.



Technology

In addition to these established relationships, OHCS is currently developing a grant agreement with Transition Projects (TPI) which will allow TPI to move their Rent Guarantee Program (RGP) classes from a classroom format to an online and mobile app format.

Services include:

- Availability in the seven most spoken languages in Oregon (English, Spanish, Russian, Mandarin, Cantonese, Vietnamese, and German), allowing access to 99% of Oregonians in their preferred language;
- The redesign of the instructor certification course for case managers and housing providers;
- An online portal for landlords to both review and register for the Rent Guarantee Program, as well as post their open rental units for graduates to see; and
- Provide robust administration tools and opportunities for data collection.

Only 1,788 Oregonians were able to access one of TPI's 155 in-person Rent Well classes taught this past year. Of those 1,788, only 860 were able to graduate due to class timing and trying to find a balance in their life situations. At this moment, roughly 1.06 million Oregon renters over the age of 18 have internet access that could benefit from this eCourse and mobile app. By moving the Rent Guarantee Program trainings to this platform, Transition Projects will be able to provide empowering tools and trainings to individuals throughout the housing continuum, including those in shelters or looking for stable housing.

Alignment with the Statewide Housing Plan

Priority: Equity and Racial Justice

Rental discrimination affects BIPOC and LGBTQ+ populations disproportionately. We have included content in several languages and partnered with agencies that historically have included culturally responsive services. These grantees give persons who have been discriminated against a voice.

Priority: Homelessness

One cause of homelessness is a person's inability to manage rent responsibilities, leading to evictions and poor credit reports. The work of all three grantees focuses on assisting households to obtain and retain housing.

Priority: Permanent Supportive Housing

N/A

Priority: Affordable Rental Housing

N/A

Priority: Homeownership

N/A



Priority: Rural Communities

The funding from these grants will support the grantees' ability to expand services into rural Oregon. CAT will expand their renter helpline into rural neighborhoods; FHC will be able to better serve outlying areas, and TPI will create a digital format that will be available across the state.

Housing Stability Council Involvement and Next Steps:

No HSC decision needs to be made at this time.

