Shelter Infrastructure Operations Program Navigations Centers (SIOP-NAV)
June 1, 2022

SIOP-NAV
Operations Manual

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Change Log

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1. Program Summary

Oregon Housing and Community Services, through the 2021 Legislative assembly, made available additional funds for investment in homeless services across the state for unsheltered individuals and families. In addition to providing facilities for emergency shelter and beds, funding will be used to assist people in need of behavioral health, medical care, public benefits, case management, hygiene services and wrap around services.

A navigation center is a low barrier outcome-based site for individuals experiencing and/or at risk of homelessness to access services. Different than a traditional one-night-stay shelter, a navigation center is a limited stay program designed to alleviate the pressures of living on the street to support an intense focus of looking for work and/or housing. In addition to dormitories, navigation centers come complete with onsite administration, intake, offices and meeting rooms for operators and residents, dining and community space, bathrooms, showers, and storage.

A navigation center may have the following additional components such as drop-in day services, culturally responsive, or behavioral health services.

Behavioral health services are a voluntary service provided to individuals experiencing homelessness with behavioral health needs. These services include but are not limited to accessing medications, one on one or group therapy and substance abuse treatment.

2. Navigation Center Requirements

(A) *Low-Barrier Shelters*

Low and no barrier policies allow homeless individuals and households to access shelter, housing, and services without preconditions such as sobriety, compliance with treatment plan, no pets, or agreement to participate in specific programs, activities, or classes. These policies allow the most in need to have access to shelter and housing.

Low Barrier Shelter best practices include, but are not limited to:

1) Your shelter has minimal expectations or requirements of people seeking shelter
2) Your shelter focuses on addressing disruptive or dangerous behaviors rather than compliance torules or case plans;
3) Your shelter welcomes self-defined family and kinship groups to seek shelter together;
4) Your shelter can identify financial resources that can support the adoption of low barrier policiesand practices and supports extended or flexible hours and adapted service-delivery models;
5) Your shelter accommodates pets and belongings;
6) Your shelter's intake process and housing navigation services coordinate closely withcommunity-based outreach services and coordinated entry;
7) Your shelter creates flexible and predictable access for people seeking shelter.

More information can be found at: https://www.usich.gov/resources/uploads/asset_library/emergency-shelter-keyconsiderations.pdf.

(B) *Training*

Grantee and subrecipient staff that provide direct services and supervise staff who provide direct services and manage homeless grants must receive training and demonstrate competency. Training is an eligible expense of case management and must minimally include:

(1)   Trauma Informed Services;
(2)   Mental Health First Aid;
(3)   Harm Reduction;
(4)   Supporting Victims of Domestic Violence;
(5)   Local Coordinated Entry Policies and Procedures; and
(6)   Fair Housing.

(C) *Coordinated Entry*

Coordinated entry is a process developed to ensure that all people experiencing a housing crisis have a single or coordinated point of entry and equal access to the homeless delivery system. This type of entry allows homeless persons and those at-risk of homelessness to be quickly identified, assessed, referred and connected to the appropriate shelter or housing, and assistance. It also facilitates the assessing agency's ability to prioritize the most vulnerable individuals and households for immediate assistance.

Coordinated Entry best practices include, but are not limited to:

(1)   Prioritization. HUD has determined that an effective coordinated entry process ensures that people with the greatest needs receive priority for any type of housing and homeless assistance available in the CoC, including PSH, Rapid Rehousing (RRH), and other interventions.

(2)   Low Barrier. The coordinated entry process does not screen people out for assistance because of perceived barriers to housing or services, including, but not limited to, lack of employment or income, drug or alcohol use, or having a criminal record. In addition, housing and homelessness programs lower their screening barriers in partnership with the coordinated entry process.

(3)   Housing First orientation. The coordinated entry process is Housing First oriented, such that people are housed quickly without preconditions or service participation requirements.

(4)   Person-Centered. The coordinated entry process incorporates participant choice, which may be facilitated by questions in the assessment tool or through other methods. Choice can include location and type of housing, level of services, and other options about which households can participate in decisions.

(5)   Fair and Equal Access. All people in the CoC's geographic area have fair and equal access to the coordinated entry process, regardless of where or how they present for services. Fair and equal access means that people can easily access the

coordinated entry process, whether in person, by phone, or some other method, and that the process for accessing help is well known.

(6) Emergency services. The coordinated entry process does not delay access to emergency services such as shelter. The process includes a manner for people to access emergency services at all hours independent of the operating hours of the coordinated entry intake and assessment processes. For example, people who need emergency shelter at night are able to access shelter, to the extent that shelter is available, and then receive an assessment in the days that follow, even if the shelter is the access point to the coordinated entry process.

(7) Standardized Access and Assessment. All coordinated entry locations and methods (phone, in- person, online, etc.) offer the same assessment approach and referrals using uniform decision- making processes. A person presenting at a particular coordinated entry location is not steered towards any particular program or provider simply because they presented at that location.

(8) Inclusive. A coordinated entry process includes all subpopulations, including people experiencing chronic homelessness, Veterans, families, youth, and survivors of domestic violence. However, CoCs may have different processes for accessing coordinated entry, including different access points and assessment tools for the following different populations: (1) adults without children,(2) adults accompanied by children, (3) unaccompanied youth, or (4) households fleeing domestic violence. These are the only groups for which different access points are used. For example, there is not a separate coordinated entry process for people with mental illness or addictions, although the systems addressing those disabilities may serve as referral sources into the process. The CoC continuously evaluates and improves the process ensuring that all subpopulations are well served.

(9) Referral to projects. The coordinated entry process makes referrals to all projects receiving Emergency Solutions Grants (ESG) and CoC Program funds, including emergency shelter, RRH, PSH, and transitional housing (TH), as well as other housing and homelessness projects. Projects in the community that are dedicated to serving people experiencing homelessness fill all vacancies through referrals, while other housing and services projects determine the extent to which they rely on referrals from the coordinated entry process.

(10) Referral protocols. Programs that participate in the CoC's coordinated entry process accept all eligible referrals unless the CoC has a documented protocol for rejecting referrals that ensures that such rejections are justified and rare and that participants are able to identify and access another suitable project.

(11) Outreach. The coordinated entry process is linked to street outreach efforts so that people sleeping on the streets are prioritized for assistance in the same manner as any other person assessed through the coordinated entry process.

(12) Ongoing planning and stakeholder consultation. The CoC engages in ongoing planning with all stakeholders participating in the coordinated entry process. This planning includes evaluating and updating the coordinated entry process at least annually. Feedback from individuals and families experiencing homelessness or recently connected to housing through the coordinated entry process is regularly gathered through surveys, focus groups, and other means and is used to improve the process.

(13)   Informing local planning. Information gathered through the coordinated entry process is used to guide homeless assistance planning and system change efforts in the community.

(14)   Leverage local attributes and capacity. The physical and political geography, including the capacity of partners in a community, and the opportunities unique to the community's context, inform local coordinated entry implementation.

(15)   Safety planning. The coordinated entry process has protocols in place to ensure the safety of the individuals seeking assistance. These protocols ensure that people fleeing domestic violence have safe and confidential access to the coordinated entry process and domestic violence services, and that any data collection adheres to the Violence Against Women Act (VAWA).

(16)   Using HMIS and other systems for coordinated entry. The CoC may use HMIS to collect and manage data associated with assessments and referrals or they may use another data system or process, particularly in instances where there is an existing system in place into which the coordinated entry process can be easily incorporated.

(17)   Full coverage. A coordinated entry process covers the CoC's entire geographic area. In CoCs covering large geographic areas (including statewide, Balance of State, or large regional CoCs) the CoC might use several separate coordinated entry processes that each cover a portion of the CoC but in total cover the entire CoC. This might be helpful in CoCs where it is impractical for a person who is assessed in one part of the CoC to access assistance in other parts of the CoC.

More information can be found at:
https://www.hudexchange.info/resources/documents/Coordinated-Entry-Policy-Brief.pdf.

(D) *Wrap-Around Services*

Navigation Centers are required to provide the following services at no cost to houseless individuals or families:

1) Case management;
2) Toilets and shower areas;
3) Dining facilities and meals;
4) Laundry facilities;
5) Hygiene facilities;
6) Storage facilities for personal property;
7) Recreation areas for children and pets; and
8) Rapid rehousing services and supports.

3.   Administrative Best Practices

Administrative Best Practices are specific identified criteria used to set a foundation of administrative, fiscal and service delivery expectations for providers. The purpose of the best practices are to ensure that no matter where individuals and families enter the homeless system, Oregonians will be provided the same access to quality services.

(A)   *Trauma Informed Care*

Trauma Informed Care is an approach that considers the prevalence of adverse childhood experiences (ACEs) among all people. A trauma-informed approach to healthcare aims to provide an environment where a person who has experienced trauma feels safe and can develop trust. The Five Guiding Principles of trauma informed care are safety, choice, collaboration, trustworthiness, and empowerment. Ensuring that the physical and emotional safety of an individual is addressed is the first important step to providing Trauma-Informed Care.

https://www.samhsa.gov/sites/default/files/programs_campaigns/childrens_mental_health/atc- whitepaper-040616.pdf

(B)   *Harm Reduction*

Harm reduction is a set of practical strategies and ideas designed to reduce negative consequences associated with drug use. Harm Reduction is also a move towards social justice built on the belief in, and respect for, the rights of people who use drugs.

Harm reduction incorporates a spectrum of strategies that include safer use, managed use, abstinence, meeting people who use drugs "where they're at," and addressing conditions of long use with the use itself. Because harm reduction includes interventions and policies designed to serve people who use drugs which reflect on specific individual and community needs, there is no universal definition of or formula for implementing harm reduction.

https://harmreduction.org/about-us/principles-of-harm-reduction/

(C)   *Housing First*

The Housing First Model encourages clients to create and implement their own goals while immediately housing or sheltering clients with no preconditions (except complying with a shelter code of conduct or standard lease agreement). Housing First best practices include, but are not limited to:

1) Access to programs is not contingent on sobriety, minimum income requirements, lack of a criminal record, completion of treatment, participation in services or other unnecessary conditions.
2) Programs or projects do everything possible not to reject an individual or family on the basis of poor credit or financial history, poor or lack of rental history, minor criminal convictions or behaviors that are interpreted as indicating a lack of "housing readiness".
3) People with disabilities are offered clear opportunities to request reasonable accommodations within application and screening processes and during tenancy; and building and apartment units include special physical features that accommodate disabilities.
4) Programs or projects that cannot serve someone work through the coordinated entry process to ensure that those individuals or families have access to housing and services elsewhere.
5) Housing and service goals and plans are highly tenant driven. Supportive services emphasize engagement and problem-solving over therapeutic goals.

6) Participation in services or compliance with service plans are not conditions of tenancy but are reviewed with tenants and regularly offered as a resource to tenants.

7) Services are informed by a harm-reduction philosophy that recognizes that drug and alcohol use and addition are a part of some tenants' lives. Tenants are engaged in nonjudgmental communication regarding drug and alcohol use and are offered education regarding how to avoid risky behaviors and engage in safer practices.

8) Substance use in and of itself, without other lease violations, is not considered a reason for eviction.

9) Tenants in supportive housing are given reasonable flexibility in paying their share of rent on time and offered special payment arrangements for rent arrears and/or assistance with financial management, including representative payee arrangements.

10) Every effort is made to provide a tenant the opportunity to transfer from one housing situation, program or project to another if a tenancy is in jeopardy. Whenever possible, eviction back into homelessness is avoided.

(D) *Lived Experience*

Incorporating the lived experience (LE) of homelessness into program design and implementation is a commitment and framework to include everyone, especially people with lived experience, in planning, implementation and evaluation.

Lived Experience best practices included, but are not limited to:

1) Bring the perspective of LE to the forefront by ensuring that no one is left out or misrepresented; ensuring that your organization's communications, fundraising, research and programs do not reinforce the misconceptions that homelessness is caused by individual problems or can be solved by charity; using professional influence to help advance the goals identified by first voice people; and dedicating time and resourced to advocacy and supporting grassroots social change efforts.

2) Include people with LE at all levels of the organization by hiring those with LE in positions at all levels within the organization; inviting those with LE to join the organization's Board and committees; including LE as a dimension in your organization's equity and diversity policies; creating liaisons within municipal governments to include city councils and police boards; and working towards sustainability and advancement for peer positions so that those hired on as peer counselors or peer researchers can advance to permanent positions.

3) Value the time of those with LE and provide appropriate supports by anticipating the compensation required, and including that cost within your budget, of properly including people with LE; creating a welcoming environment in which it is safe to express emotions; provide training and capacity building to all members of the organization; and ensuring timeframes for LE initiates do things at a reasonable pace.

4) Challenge stigma, confront oppression and promote dignity by providing training that addresses these issues to the whole organization; confronting oppression; educate around the intersectionality of racism, sexism, classism and ableism and how they work together and reinforce each other; and reviewing organizational policies and practices to ensure they promote equity, dignity and the rights of people facing homelessness.

5) Recognize LE expertise and engage those with LE in decision making by mandating that people with LE are included in decision making roles in the organization and including those with LE in influential roles allowing them to speak when they can, use social media and other platforms and methods as they are available.

6) Work together toward equitable representation by including equitable representation in the organization's strategic planning process; setting concrete objectives and specific timeframes; working with other organizations that have successfully implemented equitable representation and evaluate your progress, seeking input from people with LE in the process.

7) Build authentic relationships between with and without LE by cultivating an environment of caring, acceptance and openness where differences are celebrated, and everyone's contribution is acknowledged; ensuring that all members of the organization are included in social activities and that those activities are accessible to all; and breaking down rigid roles such as "service provider" and "service user".

More information can be found at: https://www.usich.gov/. Search for "Lived Experience".

(E) *Equity and Racial Justice*

OHCS is committed to advancing equity and racial justice in alignment with the Statewide Housing Plan and informed by national promising practices and lived experience of communities of color. OHCS is committed to an intentional, data-driven approach to reduce disparities in housing and social service provisions. Grantees are encouraged to further equity and racial justice practices by partnering with organizations that offer Culturally Responsive Services (CRS), as defined in ORS 456.005(2) to mean services that:

Are adapted to maximize the respect of and relevance to the beliefs, practices, culture and linguistic needs of the diverse client populations and communities being served, including clients and communities of color.

Have the capacity to respond to the issues of diverse communities.

Assure competent language access and incorporates diverse cultural approaches, strengths, perspectives, experiences, frames of reference, values, norms and performance styles of clients and communities to make services and programs more welcoming, accessible, appropriate, and effective for all eligible and intended recipients.

Grantees are encouraged to have a stand-alone policy that addresses how they will deliver OHCS-funded programs that include Culturally Responsive Services.

4. General Requirements

(A) *Release of information*

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

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

(B) *Confidentiality*

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

Confidential records include all applications, records, files, and communications relating to applicants for, and clients of, Navigation Center funded services.

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

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

(C) *Service Termination or Denial of Assistance*

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

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

(D) *Grievance and Appeals Process*

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

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

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

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

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

(E) *Nondiscrimination*

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

1) Informs the participant/applicant of the policy and policy must be posted in general locations in which a client/applicant is expected to be;
2) Informs the participant/applicant that they may contest any subgrantee's or subrecipient's decision that denies (for any reason) or limits eligibility of participant/applicant and/or terminates or modifies any benefits and identifies the steps to follow to contest the decision;

3) Allows any aggrieved person a minimum of thirty days to request an administrative review;

4) Informs the applicant/participant of their right to present written or oral objections before a person other than the person (or a subordinate of that person) who made or approved the decision;

5) Informs OHCS of the request for administrative review within 10 days of receiving the request; and

6) Informs the applicant/participant and OHCS in writing of the final determination and basis for the decision within ten days of the determination.

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

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

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

For more information, see Guide to Fair Housing for Nonprofit Housing and Shelter Providers producedby the Fair Housing Council of Oregon, or contact them directly at www.fhco.org.

(F) *Limited English Proficiency*

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

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

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

Grantees and subrecipient should create a written Language Access Plan (LAP) to provide a framework to document how the agency's programs will be accessible to all populations in their service area.

Grantees and subrecipient who serve few persons needing LEP assistance may choose not to establish a LAP; however, the absence of a written LAP does not release subgrantee's and subrecipient's obligation to ensure LEP persons have access to programs or activities.

(G) *Conflict of Interest*

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

1) Organizational

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

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

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

2) Individual

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

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

for those with whom he or she has a family or business tie, during his or her tenure or during the one-year period following his or her tenure.

(H) *Monitoring*

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

Grantees must notify and receive approval from OHCS when adding subrecipients and/or renewing subrecipients. Notification and approval normally occur during the grant funding application process. However, if changes are made outside of the funding application, grantees must submit a grant activity amendment request form.

(I) *Subrecipient Monitoring*

Grantees must monitor their subrecipient organizations annually or the term of the Grant Agreement, as determined by OHCS. Subrecipient organization monitoring procedures must be in place and adequately ensure compliance with Navigation Center program requirements. Monitoring reports will be retained by the subgrantee and available for review by OHCS or other authorized entity.

All subrecipients must comply with all program rules and regulations as noted in this manual, the Grant Agreement.

5. Applicant Eligibility

Applicant Eligibility	Homeless	Homelessness Prevention
Homeless Status	• Literally homeless • Imminent risk of homelessness • Homeless under other federal statutes • Fleeing DV	• Imminent risk of homelessness • Homeless under other federal statutes • Unstably housed
Income Requirement	no income requirements	80% or below area median income

(A) *Household Composition*

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

(B) *Housing Status*

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

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

- Living in a primary nighttime residence that is a public or private place not designed for human habitation (including, but not exclusive to, a car, park, abandoned building, bus or train station, airport or camping ground); **OR**

- Living in a publicly or privately operated shelter designated to provide temporary living arrangements (including congregate shelters, transitional shelter, and hotels or motels paid for by charitable organizations or by federal, state or local government programs); **OR**

- Exiting an institution where he or she has resided for 90 days or less **AND** who resided in an emergency shelter or place not meant for human habitation immediately before entering that institution.

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

- The primary nighttime residence will be lost within 21 days of the date of application for homeless assistance; **AND**

- No subsequent residence has been identified; **AND**

- The individual or family lacks the resources or support networks (e.g., family, friends, faith-based or other social networks) needed to obtain other permanent housing.

Category 3: Homeless Under Other Federal Statutes—Unaccompanied youth under 25 years of age, or families with children and youth, who do not otherwise qualify as homeless under this definition, (literally homeless, imminent risk of homelessness or fleeing/attempting to flee domestic violence) but who:

- Are defined as homeless under other listed federal statutes; **AND**

- Have not had a lease, ownership interest, or occupancy agreement in permanent housing during the 60 days prior to the program assistance application; **AND**

- Have experienced persistent instability as measured by two moves or more during the preceding 60 days; **AND**

- Can be expected to continue in such status for an extended period of time due to special needs or barriers.

1. Other Federal Statutes include:

   - Runaway and Homeless Youth Act (42 U.S.C. 5701 et seq.),
   - Head Start Act (42 U.S.C. 9831 et seq.),

- Subtitle N of the Violence against Women Act of 1994 (42 U.S.C. 14043e et seq.) (VAWA),
- Section 330 of the Public Health Service Act (42 U.S.C. 254b),
- Food and Nutrition Act of 2008 (7 U.S.C. 2011 et seq.),
- Section 17 of the Child Nutrition Act of 1966 (42 U.S.C. 1786), and
- Subtitle B of title VII of the McKinney-Vento Act (42 U.S.C. 11431 et seq.)

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

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

Category 5: Unstably Housed—Individual or family who:

- Is at risk of losing their housing, and does not otherwise qualify as homeless or imminent risk under the above listed (1-4) categories, provided that:
  - They have been notified to vacate current residence or otherwise demonstrate high risk of losing current housing; **AND**
  - Lack the resources or support networks to obtain other permanent housing (must be evidenced by documentation in the client file).

(C) *Income*

Clients qualifying as homeless and seeking emergency shelter stay and/or services do not need to meet an income requirement for eligibility.

Homeless prevention services require clients to be low income 80% of AMI or less.

Income includes the current gross income of all adult household members. Income earned by household members who are minors or full-time students and are not considered heads of household is excluded. While household assets should be identified to determine that a program applicant lacks the resources to obtain or retain permanent housing, they are generally not counted as income. Subgrantee's process for determining income eligibility and the documentation required should be consistent with other OHCS- funded program, to the extent possible.

Grantees' policies and procedures must identify what method they will use to determine income eligibility and exceptions to the policy, if any. Documentation methods may include:

- Previous 12 months of income;
- "Snapshot" of current income (at time of assessment); or
- Previous 30 days of income.

> *Convert periodic wages to annual income by multiplying:*
> *1. Hourly wages by the number of hours worked per year (2,080 hours for full-time employment with a 40-hour week and no overtime);*
> *2. Weekly wages by 52;*
> *3. Bi-weekly wages (paid every other week) by 26;*
> *4. Semi-monthly wages (paid twice each month) by 24; and*
> *5. Monthly wages by 12.*
> *To annualize other than full-time income, multiply the wages by the actual number of hours or weeks the person is expected to work.*

(D) *Citizenship and Residency*

There is no client citizenship or residency requirement for eligibility.

(E) *Eligibility Documentation*

(1) Documentation of all participant/applicant eligibility information must be available in client/applicant files or if kept electronically, available upon request in the format requested. Documentation of all efforts to obtain higher preference of verification (3rd party and Intake Worker/Case Manager Observation) when lower forms of preference are used, must be in writing and kept in the client/applicant file. Third party documentation is a requirement for payment of mortgage assistance.

(2) **Remote Application and Documentation**

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

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

Grantees and subrecipients are required to develop and maintain policies and procedures for the use of a remote application and eligibility documentation process and available for review by OHCS, upon request. Such policies and procedures must be applied equally across services that use or are supported by Navigation Center funding. These policies and procedures must address the following elements:

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

b) Verification of the identity of the applicant;

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

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

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

(3) **Order of Preference**

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

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

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

- **Applicant/Participant Self-Certification,** requires a written and signed document by the individual or head of household seeking assistance attesting to the facts for which they are certifying. A third-party may bedesignated by an applicant to sign documents on their behalf when they are unable to do so. It is theresponsibility of the subgrantee and subrecipient to provide access to language interpretation services and assistive devices necessary for applicants to understand the documents they are certifying.

6. Allowable Program Components

Seven service components are eligible for payment with Navigation Center funds:

(A) Street Outreach

(B) Emergency Shelter Operations and Essential Services

(C) Homelessness Prevention

(D) Rapid Re-Housing

(E) HMIS / Data collection and reporting

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

(G) Shelter Resident Financial Services

(A) *Street Outreach*

Street outreach is designed to reach unsheltered houseless people; connecting them with emergency shelter, housing, or critical services; and providing urgent, non-facility-based

care. OHCS encourages the use of multi-disciplinary approaches and partnerships with culturally responsive, healthcare-focused, or other specialty outreach services.

Individuals defined as unsheltered must meet the criteria for:

- Category 1, literally homeless; or
- Category 4, fleeing/attempting to flee domestic violence (where the individual or household alsomeet the criteria for category 1) and are:
  o Living on the streets (or other places not meant for human habitation); and
  o Unwilling or unable to access services in emergency shelter.

Eligible outreach services costs include, but are not exclusive to:

a) Conducting an initial assessment of applicant basic needs and eligibility;
b) Providing crisis counseling;
c) Addressing urgent physical needs, such as providing meals, blankets, clothes, or toiletries;
d) Actively assessing, connecting, and providing information and referrals to needed services, including emergency health and mental health services;
e) Cost of outreach including, but not limited to, marketing and outreach materials, translation and interpretation services and cell phone costs of outreach workers, etc.;
f) Case management activities;
g) Emergency health services to the extent that other appropriate services and treatment are unavailable or inaccessible within the community;
h) Behavioral health services to the extent that other appropriate services and treatment are unavailable or inaccessible within the community; and
i) Travel expenses incurred by outreach workers, social workers, medical professionals, or other service agency employees during the provision of allowable street outreach services.

(B) *Emergency and Transitional Shelter*

Navigation Center funds can be used to provide shelter; non-congregate shelter; essential services; and renovation of shelter facilities

(1) SHELTER OPERATIONS

Shelter operations are costs to operate and maintain emergency and or transitional shelters and provide other emergency lodging when appropriate. Eligible costs include but are not exclusive to:

a) Minor or routine repair and maintenance;
b) Rent or lease payments for the shelter facility;
c) Janitorial supplies and service to operate shelter facility;
d) Security equipment or service to operate shelter facility; Facility Management;
e) Insurance;

f) Utilities (water, sewer, garbage, gas, electricity, internet, phone) for shelter facility;

g) Food;

h) Furnishings;

i) Supplies necessary for the operation of the emergency shelters;

j) Hotel/Motel vouchers for families and individuals when no emergency shelter is available;

k) Hotels/Motels as Non-Congregate Shelter;

l) Purchase of PPE and supplies for vaccine events held for shelter residents

m) Renovation

Emergency shelters must meet minimum habitability standards. Shelters renovated with NAVIGATION CENTER funds are also required to meet state or local government safety and sanitation standards, as applicable.

(2) SHELTER SUPPORT SERVICES

Navigation Center funds can pay to meet the essential needs of shelter residents to facilitate transition out of shelter into more stable housing. Support services must be made available to households that receive hotel or motel vouchers to ensure quick and successful transition to more stable housing.

Navigation Center participants cannot be required to sign leases or occupancy agreements, receive treatment, or perform any other prerequisite activities as a condition for staying in any shelter or receiving services

Eligible support service costs include, but are not exclusive to, at the discretion of the subgrantee or subrecipient case manager:

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

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

c) Purchase of identification and driver's license;

d) Purchase of birth certificates;

e) Credit repair assistance (not debt payment);

f) Tenant readiness education;

g) Food and clothing;

h) Crisis intervention/counseling;

i) Transportation;

j) Costs to board and care for shelter residents' animals, such as boarding costs, kennels, leashes, veterinary services, food, toys, etc. Grantees must have an

animal policy in place to ensure the safety and welfare of all residents and provide it to OHCS upon request; and

k) Client direct services.

(3) ESSENTIAL SERVICES COMPARISON BETWEEN OUTREACH AND SHELTER

Services through the street outreach component are not the same as services provided through emergency shelter systems. The chart below compares appropriate services for each component.

Comparison Table of Essential Services	
Street Outreach (Unsheltered Houseless Persons)	**Emergency Shelter Services (Sheltered Houseless Persons)**
Engagement	
Case Management	Case Management
	Childcare
	Education Services
	Employment Assistance/Training
Emergency Health Care	Outpatient Health Services
	Legal Services
	Life Skills Training
Emergency Mental Health Care	Mental Health Services
Services for Special Populations	Services for Special Populations
	Substance Abuse Treatment
Transportation	Transportation

(C) *Hotels/Motels as Non-Congregate Shelter*

NAVIGATION CENTER funds may be used for hotel/motel costs for individuals or families in shelters, receiving rapid-rehousing or homelessness prevention rent assistance.

Eligible costs include:

a) Cost of the room;

b) Charges and costs for enhanced cleaning, and

c) Repairs for damage caused above normal wear and tear.

To be eligible for a hotel or motel placement, a household must be:

- Experiencing homelessness as per the HUD definition of homelessness; or
- Receiving Rapid Re-Housing assistance through NAVIGATION CENTERs, or
- Receiving Homelessness Prevention assistance through NAVIGATION CENTERs.

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

Navigation Center funds can pay for **Homelessness Prevention** services to allow households at imminent risk of homelessness or unstably housed to regain stability in their current housing or other permanent housing.

Navigation Center funds can also pay for **Rapid Re-housing** services to support households who are literally houseless to transition directly to permanent housing.

Eligible **Homelessness Prevention and Rapid Re-housing** services include, but are not exclusive to:

Navigation Center funds; Homelessness Prevention and Rapid Re-Housing
• Housing costs such as mortgage/manufactured home payments and arrearages(arrears limited to 3 months); • Housing costs such as rent payments, late fees and rent arrearages; • Manufactured home rental space "lot rent" or RV space lot for primary housing; • Utility payments and arrearages (other utility assistance programs must be deferred to first, utility assistance is only eligible when other utility assistance cannot be obtained and payment of utility assistance is in the context of, anddocumented in, an action plan or goal designed to increase housing stability) (utilities include water, sewer, garbage, gas, electricity, phone, internet), • Moving costs, security, pet and utility deposits and application fees; • Landlord engagement (such as incentives, communication, newsletters, etc.); • Client direct services; • Self-sufficiency activities including education and training in such areas aspersonal finance and budgeting, job search, and access to job training andliteracy. • Case management and housing relocation assistance

(E) *HMIS / Eligible Data Collection Costs*

NAVIGATION CENTER funds can be used to capture and deliver data to the designated HMIS provider for the area.

Eligible costs include but are not limited to:

a) Purchasing or leasing equipment, including telephones, fax machines, and furniture;

b) Purchasing hardware or software licenses and equipment;

c) Obtaining technical support;

d) Leasing office space;

e) Paying charges for electricity, gas, water, phone service, and high-speed data transmission necessary to operate or contribute data to the HMIS;

f) Paying salaries for operating HMIS, including:

g) Completing data entry;

h) Monitoring and reviewing data quality;

i) Completing data analysis;

j) Reporting to the HMIS Lead;

k) Training staff on using the HMIS or comparable database; and

l) Implementing and complying with HMIS requirements;

m) Paying staff travel costs to conduct intake;

n) Paying participation fees charged by the HMIS Lead.

(F) *Shelter or Transitional Housing Facilities Acquisition, Rehabilitation/Conversion*
[Refer to your Subgrantee Contract/Agreement for Procurement requirements]

Where allowable, under OHCS state-funded programs can be used for the categories of acquisition and rehabilitation/conversion (encompasses rehabilitation, renovation, and conversion), of emergency shelter and transitional housing for households who are homeless. Projects using targeted funds must ensure that funds exclusively serve the target population. Where the program requires, client eligibility applies. For OHCS-funded programs, acquisition of land must also include a building structure to be used. Acquisition of bare land is not an eligible use of funds.

Navigation center funding can be used for the acquisition, rehabilitation or conversion of emergency shelter and transitional housing for households who are homeless or unstably housed and at risk of homelessness. Use of funding for acquisition, rehabilitation or conversion must follow the guidance indicated in this section. If you have any additional questions, please contact your OHCS Program Analyst.

(1) *Distinguishing Between Maintenance and Renovation (Rehabilitation/Conversion)*

Where allowable, OHCS state-funded programs can be used for the category of Shelter Operations, which refers to "Repairs to facility". This is meant to define minor or routine repairs.

Distinguishing between maintenance activities and more extensive repair and rehabilitation activities requires careful consideration. This information provided will assist in determining whether an activity is maintenance and therefore exempt from further environmental review, or, if it is rehabilitation and therefore requires further environmental review.

In general, maintenance activities slow or halt deterioration of a building and do not materially add to its value or adapt it to new uses. Sometimes, maintenance of a building feature or system requires periodic replacement of individual component parts that are subject to normal wear and tear. While maintenance is often budgeted as an operating expense, and repairs and rehabilitation are treated as capital expenses, it is the nature of the activity itself, not its budget category that determines whether it qualifies as maintenance. Simultaneous maintenance work in multiple units or buildings is still considered maintenance.

For environmental review purposes, deferred maintenance that has resulted in a need for extensive repairs and rehabilitation does not qualify as maintenance. If items that

would otherwise be considered maintenance are done as part of an extensive remodeling or renovation of a building that amounts to rehabilitation, the entire job is considered rehabilitation. Depending on the extent of damage, activities performed after a disaster event will typically not be considered maintenance.

(2) *Shelter Operations: Maintenance*

In general, maintenance activities include: cleaning; minor or routine repairs of furnishing, equipment, and fixtures not permanently affixed to the building; protective or preventative measures to keep a building, its systems, and its grounds in working order; periodic replacement of a limited number of component parts of a building feature or system that are subject to normal wear and tear; and replacement of a damaged or malfunctioning component part of a building feature or system. Replacement of all or most parts or an entire system is not maintenance. Maintenance activities:

- Do not materially add to the value of the building/property;
- Do not appreciably prolong the useful life of the building/property; and
- Do not adapt the building/property to new uses.

See the Table in the Appendix of the program's operational manual for specific examples of maintenance activities.

The minimum period of use for maintenance activities is the same as for other shelter operations and essential services activities—that is, the recipient/subrecipient must provide services or shelter to homeless individuals and families at least for the period during which OHCS funds are provided (for example, the contract period specified in a subgrantee contract/agreement). Again, maintenance activities are not subject to environmental review.

(3) *Renovation and Conversion*

In general, an activity that **does** materially add to the value of the building, appreciably prolong its useful life, or adapt it to new uses would be considered renovation or conversion.

See the Table in the Appendix of the program's operational manual for specific examples of maintenance activities.

When the activity is renovation, rehabilitation or conversion, the scope of the environmental review may be limited if the work is minor and does not involve ground disturbance. Consult Regional Environmental Officers, Field Environmental Officers, and Program Environmental Clearance Officers for information and examples of Environmental Review Record documentation for limited reviews. The scope of an environmental review relates to the nature and extent of the rehabilitation activities. Some activities, especially those limited to interior spaces, may not have the potential to affect the natural environment,

and therefore not require analysis under some of the related laws and authorities like those addressing Wild and Scenic Rivers, Endangered Species, Farmland Protection, or Protection of Wetlands. A reviewer can quickly document such instances in the Environmental Review Record, and focus effort and further analysis on those environmental areas that may be impacted by a project. In residential rehabilitation, those typically include Floodplain Management, Historic Preservation, Noise Abatement, Toxic Chemicals and Radioactive Materials. Historic Preservation review (Section 106) may be expedited through Programmatic Agreements and other program alternatives.

It is also possible to group multiple years of expected activities into one environmental review. For instance, rehabilitation activities could be outlined in a 5-year environmental review for a property and be reviewed once, without requiring individual reviews each time a single activity occurs during the time period.

Depending on the cost of the renovation and value of the building, it might be considered minor rehabilitation or major rehabilitation (see below).

Renovation costs can include architect's fees, engineering costs, permits, and other costs of a renovation or conversion project when they are reasonable and appropriate, and directly related to the renovation or conversion project. Renovation includes four separate activities. The chart below shows each activity, the definition, the minimum period of use requirement, and the level of environmental review for each. Note that for renovation and conversion activities, the minimum period of use starts on the date the building is first occupied by homeless individuals or families after the renovation or, if the building is occupied during the renovation, the period of use starts on the date the renovation is completed.

Type of Renovation Activities	Definition	Minimum Period of Use	Level of Environmental Review Required
Minor Rehabilitation	The cost of the rehabilitation of an existing emergency shelter is 75% or less of the value of the building before rehabilitation*	3 Years	Generally, Categorically Excluded
Major Rehabilitation	The cost of the rehabilitation of an existing emergency shelter exceeds 75% of the value of the building before rehabilitation*	10 Years	Environmental Assessment (can require an Environmental Impact Statement (EIS)
Minor Conversion	The cost of the conversion of a building to an emergency shelter is 75% or less of the value of the building after conversion*	3 Years	Environmental Assessment (can require an Environmental Impact Statement

			(EIS)
Major Conversion	The cost of the conversion of a building to an emergency shelter exceeds 75% of the value of the building after conversion*	10 Years	Environmental Assessment (can require an Environmental Impact Statement (EIS)

* The value of the building is the reasonable monetary value assigned to the building, e.g., by an independent real estate appraiser.

(4) Free-Standing Temporary Shelter

Free-Standing Temporary Shelter (FSTS), also known as tiny homes and pallet shelters, are a type of alternative shelters allowed under the definition of Shelter Acquisition as an equipment purchase. This includes "new construction" of shelter. Prior OHCS approval of the purchase of FSTS is not the same as the OHCS Acquisition/Rehabilitation/Renovation process. The process to receive approval for the purpose of Free- Standing Temporary Shelters is to complete a FSTS pre-approval application, located on the HSS Dashboard, which is targeted for different types of subgrantee contract/agreement. The application includes completing information on your purchase process, site location, amenities on site which is inclusive of utilities, waste management, food service, and public safety strategy, as well as your shelter operation plan. Funds used for the purchase of FSTS must be allocated to the acquisition category of your OHCS grant; however, ongoing operation of FSTS already placed in service may be allocated to the shelter operations category of your OHCS grant, if an allowable expense.

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

(5) Acquisition, Rehabilitation, Renovation or Conversion Instructions

A project description with allowable costs, and following subgrantee contract/agreement rules, must be provided to OHCS in the form and format requested, if needed, and activities for this purpose carry additional requirements as identified below:

a) Restrictive Use Period

The Restrictive Use Period for the OHCS-funded acquisition, rehabilitation, conversion and/or renovation is dependent on use of funds and is 10 years for all acquisition. The Restrictive Use Period runs from December 31 of the year the first building in the Project is placed in service (PIS) or until December 31, [Year of PIS

+ # of years appropriate for use], whichever is later. The project owner must agree to annually certify compliance with this requirement and submit that certification to OHCS at hss.acq.rehab@hcs.oregon.gov.

Rehabilitation and Renovation Minimum Period of Use		
	Use Requirement	**Determining Criteria**
Major Rehabilitation	10 years	Rehabilitation costs exceed 75% of the value of the building before rehabilitation.
Conversion	10 years	Conversion costs exceed 75% of the value of the building after conversion.
Renovation, including rehabilitation and conversion costs that do not meet 10-Year criteria.	3 years	Renovation costs are 75% or less of the value of the building before renovation.

b) Contractor Oversight

Architectural: All rehabilitation, conversion or renovation concepts must be reviewed and approved by an architect of subgrantee's choosing. For any rehabilitation, conversion or renovation activity costing more than $30,000, or if any internal or external doors, windows or walls will be added, removed, or moved, the project must hire an architect of record to develop the construction documents.

General Contractor: For any construction costing more than $50,000 or involving three or more trade specialties, the subgrantee must hire a general contractor.

c) Period of Fund Availability

All project costs to be paid with OHCS funds must be incurred on or before the last day of the biennium in which the allocation was made.

d) Use of HMIS

Except for Domestic Violence victims, subgrantee will be required to enter data into an approved HMIS system for all persons assisted in an OHCS-funded shelter or transitional housing unit. Domestic Violence providers must collect client data in a database comparable but separate from the subgrantee's HMIS database and must report client-blind data to the subgrantee. Subgrantee must participate in OHCS's required data reporting process, complying with all information requests, and reporting deadlines.

e) Procurement Requirements

Subgrantees must follow procurement requirements as outlined in the subgrantee contract/agreement.

f) OHCS Anti-Displacement and Relocation Assistance Policy

OHCS-funded acquisition should not cause the involuntary displacement of tenants. OHCS encourages subgrantees to pursue projects that will not permanently displace tenants. If applicable, Subgrantee will provide OHCS, submitted at hss.acq.rehab@hcs.oregon.gov. with a description of the relocation plan and whether existing residents will have an opportunity to return to the facility, as well as any permanent relocation. Subgrantee's description shall include the kind of advance notice that will be given to affected tenants; and what funding the subgrantee will provide to assist persons being relocated. Subgrantee must comply with any laws addressing tenant protections and evictions.

g) OHCS Fiscal Monitoring

OHCS fiscal monitoring requirements for acquisition and/or rehabilitation/construction projects are the same as fiscal monitoring of other costs incurred. Subgrantee must maintain a project file available for review during the monitor's visit or at the monitor's direct request.

h) Monthly Progress Report

A standardized Monthly Progress Report form must be submitted by the 10th day of the month following the month being reported. Reporting must begin for the month following the date of the first expense of OHCS funds is incurred and must continue monthly until the project can be reported "in use" (shelter) or "occupied" (housing). During all months when the subgrantee will be requesting funds from OHCS, the Monthly Progress Report must include detail of the project work completed during that month and the percentage of completion achieved to date until the project is complete and placed into service. The Monthly Progress Report form is available on the OHCS HSS Dashboard at: https://app.smartsheet.com/b/publish?EQBCT=8a215621578a4f76ae98113d719d5e64.
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i) First Year Report

At the end of the first calendar year the project was placed in service, subgrantee will be asked to provide OHCS with a year-end narrative report describing the project and how it is being used in the community. The First Year Report form is available on the OHCS HSS Dashboard at: https://app.smartsheet.com/b/publish?EQBCT=8a215621578a4f76ae98113d719d5e64. Submit report to OHCS at: hss.acq.rehab@hcs.oregon.gov. This report must be sent in the month of January prior to the due date and must not be sent earlier.

j) Annual Certificate of Continuing Program Compliance

A Certificate of Continuing Program Compliance will be required from the subgrantee for the previous year. Subgrantee will use the Certificate to confirm the operation of the project complies with the restrictive use requirements. The Certificate form is available on the OHCS HSS Dashboard at: https://app.smartsheet.com/b/publish?EQBCT=8a215621578a4f76ae98113d719d5e64.

k) Environmental Review

Subgrantee must complete the appropriate Environmental Assessment or Environmental Impact Statement. Such environmental review must be performed by the responsible entity. The responsible entity must be the unit of general local government within which the project is located that exercises land use responsibility Such review must be submitted to OHCS at: hss.acq.rehab@hcs.oregon.gov.

l) Certificate of Occupancy

Subgrantee must submit a Certificate of Occupancy signed by their local jurisdiction upon completion of the project. The Certificate of Occupancy must be submitted to OHCS at: hss.acq.rehab@hcs.oregon.gov.

m) Subgrantee's Responsibilities for Subrecipients

OHCS will only fund the acquisition of property if that property will be owned by the subgrantee. OHCS will fund rehabilitation of a property owned by a subgrantee or a subrecipient of the subgrantee. OHCS will always allocate the OHCS funds to the subgrantee, not the subrecipient. All requirements of the grant agreements, program guidelines apply and the subgrantee will be held responsible to ensure all requirements are met by the subrecipient and its vendors. Subrecipients cannot own equipment purchased with OHCS funds. Any equipment must be owned by the subgrantee only and the purchase process must conform to grant agreement/contract procurement requirements.

n) Repurposing the Property

Subgrantee may determine the community's housing needs have changed and the current use of the property is no longer in high demand. The project owner may be allowed to repurpose the use of the property before the end of a restrictive use period by obtaining prior written approval from OHCS. The eligibility restrictions required by the original funding source must apply. To discuss repurposing, the subgrantee must contact the HSS program analyst.

o) Transferring Property Ownership

Within the Restrictive Use Period, the project owner may not transfer, sell, assign, bequeath, or dispose of any interest in the project to any person, entity or other assignee, without obtaining the prior written consent of OHCS. The proposed use of any monies gained from the transaction must be pre-approved by OHCS.

p) **Checklist of Steps to Follow**

File review is the basis for OHCS monitoring. Subgrantee must keep a complete file of all project requirements for 6 years following the final year of the restrictive use period. Follow these steps to ensure you are in compliance with the rules and regulations for using OHCS for Acquisition, Rehabilitation, Renovation or Conversion:

1) Read through all these materials to ensure you understand the requirements that apply to your project and your responsibilities.

2) Before drawing your first request for funds, ensure that OHCS has received your first completed Monthly Progress Report.

3) If required, ensure that the performance of an Environmental Review is complete and submitted to OHCS.

4) By the 10th day of the month following each month being reported until the project is placed into service, submit to OHCS a completed Monthly Progress Report.

5) By the end of the first calendar year that the project is placed in service, submit to OHCS a completed First Year Report.

6) Upon completion of the project and prior to placing the project in service, submit to OHCS a completed Certificate of Occupancy.

7) By January 20th of each year after the project is placed into service and for the duration of the applicable restrictive use period, submit to OHCS a completed Annual Certificate of Continuing Program Compliance.

(G) *Shelter Resident Support Services*

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

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

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

3) Purchase of identification and driver's license;

4) Purchase of birth certificates;

5) Credit repair assistance (not debt payment);

6) Tenant readiness education;

7) Food and clothing;

8) Crisis intervention/counseling;

9) Transportation;

10) Costs to board and care for shelter residents' animals, such as boarding costs, kennels, leashes, veterinary services, food, toys, etc. Subgrantees must have an animal policy in place to ensure the safety and welfare of all residents and provide it to OHCS upon request; and

11) Client direct services.

7. Financial Management

(A) *Administration*

Grantees are allowed to use up to fifteen percent (15%) of their total Navigation Center allocation for administrative costs, including those allowed for subrecipient organizations with whom the grantee contracts. There is an expectation that administrative funds will be shared with subrecipients commensurate to the services provided through the program by subrecipients.

Allowable administrative costs benefit the organization as a whole and cannot be attributed specifically to a particular program. All amounts billed to administration must be supported by actual costs.

Allowable costs include, but are not limited to:

(1) Senior executive management personnel salaries and benefits (unless they are directly involved in program operations), administrative staff travel costs;

(2) General services such as accounting, budget development, personnel, contracting, marketing, agency audit, agency insurance;

(3) Board expenses (excluding meals);

(4) Organization-wide membership fees and dues specific to homeless systems and programs;

(5) General agency facilities costs (including those associated with executive positions), such as rent, depreciation expenses, and operation and maintenance (as part of the organization's direct or indirect cost allocation plan); and

(6) Equipment rental/purchase, insurance, utilities, and IT costs that are not program specific but relate to the administration of the agency as a whole.

(B) *Use of OPUS*

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

OHCS maintains an OPUS Manual and OPUS Help Desk. View the OPUS User Manual from the landing page, under the Help tab, after logging into OPUS. OPUS Help Desk can be reached at:

Email: opushelp@hcs.oregon.gov

Ph: (503) 986-2099

Toll Free: (800) 453-5511 Option 6

(C) *Request for Funding Documentation*

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

(D) *Budget Change Requests and Grant Activity Amendments*

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

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

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

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

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

(E) *Funds Spend Down*

Grantees are expected to fully obligate or expend grant funds during each funding cycle in accordance with OHCS policy. OHCS will review subgrantee's grant spending in accordance with subgrantee's contract and OHCS policy. Contact your OHCS Program Analyst for any questions regarding your expenditure of funds.

(F) *Procurement*

Purchases of equipment or property are subject to additional provisions and requirements as stated in the Grant Agreement Standard Terms and Conditions and Special Provisions

exhibits. Fixed assets with a value greater than $5,000, includes computer equipment, electronic equipment, photography equipment, hand tools and other items. Title to all equipment purchased in whole or part with OHCS funds must be in the name and possession of the subgrantee. Subgrantee shall prohibit its subrecipients from using OHCS funds to purchase equipment. Disposal of any item having an original cost of more than

$5,000, and which is currently valued above $5,000, requires prior OHCS consent. Property and equipment purchased with OHCS grants shall not be used for collateral or to secure financing.

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

8. Data Requirements

(A) *Data Entry*
Navigation Centers are required to utilize the Homeless Management Information System (HMIS) being operated in their geographic Continuum of Care (CoC). HMIS Data and Technical Standards have been established by the U.S. Department of Housing and Urban Development, (HUD).

(Except participants in OHCS'S HMIS Data Lake, see (F) Comparable Database's)

Navigation Centers are responsible for posting HUD required Privacy Notices and protecting program participant's confidentiality following all HMIS Data Standards.

(B) *Data Timeliness*
Timely and accurate data entry is critical to ensuring meaningful data analysis and reporting. Therefore, it is recommended that Grantees and subrecipients enter data within three business days (or sooner depending on local CoC HMIS policies).

(C) *Data Entry Requirements for Emergency Shelters and Beds*
Navigation Centers are required to report overnight shelter stays for participants, which is separate and distinct from participants accessing drop-in services or considered Navigation Center clients. This will allow the counting of bed nights provided in addition to the client level information on participants staying overnight. Facility, congregate based programs will be tracked and reported separately from any hotel/motel, non-congregate program.

(D) *Data Entry Requirement for Services*
Navigation Centers are required to report participants who are getting services during the day in addition to shelter support services. This requires both an HMIS entry/exit, and HMIS Service Transaction. OHCS is prescribing the use of 5 standard service types. *See attached list service types and matching taxonomy codes. HMIS's utilize the Alliance of Information

and Referral Systems (AIRS) taxonomy codes for service types. Of course, OHSC welcomes the use of more than just the prescribed service types. All services will be reported.

(E) *Required Data Elements*

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

(1)   Name

(2)   Social Security Number

(3)   Date of Birth

(4)   Race/Race Additional

(5)   Ethnicity

(6)   Gender

(7)   Veteran Status

(8)   Disabling Condition

(9)   Universal Project Stay Elements (Prior Situation, Length of stay in previous, date this episode started,etc)

(10)   Overnight Date In, Project Start Date

(11)   Overnight Date Out, Exit Date

(12)   Service Project Start Date and each service Start Date

(13)   Service Project Exit Date and each service End Date

(14)   Destination

(15)   Relationship to Head of Household

(16)   Client Location

(17)   Current County of Residence (for grantees that cover more than one county)

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

(F) *Comparable Database*

Navigation Centers, currently using an HMIS Comparable Database, will interact with the OHCS HMIS Data Lake to provide client level data. The comparable database must be able to provide an export file that meets the HUD HMIS XML Schema criteria, HUD comma-separated values (CSV) format, or can use an application programming interface (API) to connect and upload the same required data elements for reporting.

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

Comparable Databases must have the following characteristics:

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

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

(G) *Reporting Requirements*

Navigation Centers are required to submit quarterly HMIS produced, program reports by the 20th of the month following the end of each quarter in accordance with OHCS Grant Agreement directives for content and format. At the discretion of OHCS, other reports may be required when deemed necessary to provide program utilization and performance information. The two HMIS produced reports will come from SAP Business Objects. A Master Query to provide all client demographic information and overnight stays, plus a Service Transaction History Report.

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

9. Records Requirements

(A) *Case Files*

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

A client services or housing plan is required for those clients receiving more than one time only services and must be in the case file. Existing assessments and active case plans with other providers may be used and included in the client file.

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

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

(B) *Records Access*

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

(C) *Records Retention*

Grantees and subrecipients shall retain all program records pertinent to client services and expenditures incurred under Navigation Centers in a manner consistent with the requirements of state and federal law. This includes, but is not limited to, those requirements listed in Administrative Rule, Operations Manual and Special Schedules. Find the OHCS Special Schedule at the Oregon State Archives:
(https://sos.oregon.gov/archives/Pages/state_admin_schedules.aspx).

Find the State Agency General Records Retention Schedules at the Oregon State Archives:
https://secure.sos.state.or.us/oard/displayDivisionRules.action?selectedDivision=591

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

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10. Appendix A – Maintenance/Rehab Activities

EXAMPLES OF MAINTENANCE ACTIVITIES vs. REHABILITATION ACTIVITIES FOR ENVIRONMENTAL REVIEW PURPOSES

Feature or System	Maintenance Activities [4]	Rehabilitation Activities [5]
Site	• lawn care (litter pickup, mowing, raking), trimming trees and shrubs • snow/ice removal • neighborhood cleanup • application of pavement sealants, parking lot restriping, directional signage or marking for handicapped accessibility • repair of cracked or broken sidewalks	• new landscaping throughout an area • construction of new walkways, driveways or parking areas, or replacement thereof
Building Exterior	• cleaning and fixing gutters and downspouts • repainting previously painted surfaces (including limited wet scraping and low-pressure washing) • replacing deteriorated section of siding • removal of graffiti	• cleaning masonry or stripping painted surfaces by sandblasting, acid wash, or high pressure washing • applying new exterior siding
Roof	• fixing leaks • application of waterproof coating to a flat roof • replacement of deteriorated flashing • in-kind replacement of loose or missing shingles or tiles	• complete replacement of roof with new shingles, tiles, roll roofing, membrane, or new metal roof • installation of solar panels
Windows and Doors	• washing windows • caulking, weather stripping, re-glazing windows and doors • fixing broken windowpane(s), storm window(s) or damaged entry door • replacing broken door lock • replacing a vandalized entry door to restore security of a building or unit • replacing a single severely damaged window to match • annual switch out of storm and screen panels	• replacement of windows • replacement of exterior doors • adding storm windows or storm doors
Interior Walls and Ceilings	• patching or mending cracked plaster • patching or fixing holes or cracks in drywall • replacing stained ceiling tiles • painting or wallpapering	• installation of new drywall or paneling • installation of new acoustical ceiling • installation of dropped ceilings
Flooring	• cleaning floors • stripping wooden floors and resealing • installation or replacement of carpeting or vinyl flooring*	• installation of new wood floor

* These maintenance items may require purchase of flood insurance if they occur in a Special Flood Hazard Area (SFHA), and costs exceed the standard deductible for the specific type of structure or unit under the National Flood Insurance Program (NFIP).

Feature or System	Maintenance Activities [4]	Rehabilitation Activities [5]
Circulation	• in-kind replacement of broken stair treads or balusters • inspection and servicing of elevators	• rebuilding stair or constructing new stair • installation of new access ramp • elevator replacement
Kitchen	• replacement of stoves, refrigerators, and microwaves* • replacing cabinet hardware*	• complete or substantial kitchen remodel
Bathroom/Laundry	• unclogging sink or toilet • replacing deteriorated toilet in an occupied housing unit* • replacing broken medicine cabinet* • replacing washing machines and dryers* • installation of grab bars	• complete or substantial bathroom remodel
HVAC	• servicing and maintenance of mechanical systems • changing air filters • cleaning air ducts • installing or replacing a window air conditioner • replacing a malfunctioning part of a HVAC system like a thermostat *	• installation of new furnace or heat distribution system • installation of central air conditioning
Electrical/Lighting	• changing light bulbs • replacing malfunctioning light fixture, electrical switch or outlet*	• major rewiring of building • installation of new electrical service • replacing or moving electrical panels
Plumbing	• fixing plumbing leaks* • repairing damage from frozen pipes* • repairing water or sewer connection within existing utility trench alignment • replacing malfunctioning water heater*	• installation of new plumbing system • new water or sewer connection
Security	• repair of security alarm systems • boarding up a vacant building with protective plywood • installation of temporary security fencing • installation of security devices needed for an individual health facility patient	• installation of permanent security bollards • installation of new security alarm system
Life Safety	• servicing smoke, fire and CO2 detectors • installation of smoke, fire and CO2 detectors	• making substantial physical changes to a building to comply with fire and life safety codes • installing fire suppression system
Pest Infestation	• pest inspection/treatment	

[4] Categorically Excluded from NEPA and not subject to the related authorities listed in 24 CFR 50.4 and 58.5, unless Extraordinary Circumstances apply pursuant to 24 CFR 50.19(a) or 58.35(c).

[5] Generally Categorically Excluded from NEPA and generally require review under related authorities listed in 24 CFR 50.4 and 58.5, but an RE or HUD reviewer may make a determination that an Environmental Assessment or Environmental Impact Statement is required due to individual project circumstances.

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