

Oregon Emergency Rental Assistance (OERA) June 16, 2021



Program Guidance

Contacts

Oregon Housing and Community Services
Homeless Services Section
(503) 986-2000

Published date: June 16, 2021

Change Log

- *Added Section 4(A): Assisting with the Application, causing the renumbering of other subsections within Section 4. 05/15/21.*
- *Information clarified in Section 4(I) Citizenship: Requesting information about someone's citizenship status is not allowed for the OERA program; although Allita does allow for the entry of Social Security Numbers by the client. 05/15/21.*
- *Added 2 paragraph in Section 3(B) Confidentiality: To address confidentiality with domestic violence survivors. 05/18/21.*
- *Modified Section 4(E): Updated to include that advance child tax credits to not count towards income. 05/19/21.*
- *Added paragraph in Section 5: Allowable Program Components and Expenditures clarifying that Subgrantees must offer all services provided by OERAP. 05/21/21.*
- *Modified Section 5(D): Landlord or Utility will not accept payment clarifying that Subgrantees are required to pay the tenant directly when the landlord or utility will not accept payment. 05/24/21.*
- *Modified Section 5(A): Financial Assistance, to include RV/Travel Trailer space rents when unit used for permanent housing. 05/28/21.*
- *Added use of the Certification of Income-Self Verification from in Section 4(E): Income. 05/28/21.*
- *Moved Income Determination and Redetermination section to within Section 4(E): Income to highlight the different options for determining income. Included the use of the filed 2020 IRS Form 1040 as a document to be used for determining income. This action renumbered the remaining subsections of Section 4. 06/10/21.*
- *Removed statement that ID must match in address to supporting documentation and clarified that ID in name must match supporting documentation in Section 4(J)(1): Eligibility Documentation. 06/10/21.*
- *The title of Section 4(A) was change to include Modification of an Application and additional language was added allowing Subgrantees to modify an application with client acknowledgment of the change documented in Allita. 06/16/21.*

Table of Contents

1.	OERA Program Intent.....	5
2.	Program Summary	5
3.	General Program Requirements.....	5
	(A) Privacy Policy, Terms and Conditions	5
	(B) Confidentiality.....	5
	(C) Service Termination or Denial of Assistance	6
	(D) Grievance and Appeals Process	7
	(E) Nondiscrimination.....	7
	(F) Limited English Proficiency	8
	(G) Conflict of Interest	9
	(H) Monitoring	10
	(I) Subrecipient Monitoring.....	10
	(J) Monitoring Checklist.....	10
4.	Applicant Eligibility	11
	(A) Assisting with the Application.....	12
	(B) Duplication of Benefit	12
	(C) Household Composition.....	12
	(D) Housing Status	13
	(E) Income	14
	(F) COVID-19 Impact Eligibility Criteria	15
	(G) Prioritization	15
	(H) Citizenship.....	15
	(I) Residency	16
	(J) Eligibility Documentation.....	16
5.	Allowable Program Components and Expenditures	19
	(A) Financial Assistance	19
	(B) Housing Stability Services	23
	(C) Administration –	23
	(D) Landlord or Utility Will Not Accept Payment.....	25
	(E) Documenting Rent and Rent Arrears.....	26
6.	Financial Management	27
	(A) CFDA.....	27
	(B) Use of Allita	27
	(C) Advance Requests for Funds.....	27
	(D) Budget Change Requests and Implementation Report Amendments	28
	(E) Funds Spend Down	29
7.	Data Requirements.....	29
	(A) Data Entry	29
	(B) Required Data Elements	29
8.	Records Requirements.....	33
	(A) Case Files.....	33
	(B) Records Access.....	33

(C) Records Retention..... 33

9. Applicable Rules and Regulations 34

For questions related to OERA, contact Homeless Services Staff by using the dedicated email address at: hcs.OERA@oregon.gov.

1. OERA Program Intent

The U.S. Department of the Treasury (Treasury) has made available \$25 billion nationwide to assist households that are unable to pay rent and utilities due to the COVID-19 pandemic. The funds are provided directly to States, U.S. Territories, local governments, and Indian tribes. Oregon Housing and Community Services (OHCS) is using a new platform, called Allita, for distributing the funds through Community Action Agency (CAA) partners and other community-based organizations (referred to herein as Subgrantees and their subrecipients). Allita is a web-based portal that applicants can apply to directly or CAA's can assist applicants with filling out applications. This level of uniformity in program design across the state aims to create a more seamless experience for applicants and reduce administrative burden on CAA's by relying on software to help organize and process the applications.

More information can be found about the Treasury program at: <https://home.treasury.gov/policy-issues/cares/emergency-rental-assistance-program>, including a frequently asked questions (FAQs) document. OHCS will update this OERA Program Guidance and accompanying OERA FAQs as the Treasury releases more guidance but CAA's are encouraged to regularly check the Treasury website for more information as well.

2. Program Summary

OERA provides rental assistance for households who have been impacted by the COVID-19 pandemic.

To qualify for assistance, households must meet the following criteria:

- Qualifies for unemployment or has experienced a reduction in household income, incurred significant costs, or experienced a financial hardship due to COVID-19;
- Demonstrates a risk of experiencing homelessness or housing instability; and
- Has a household income at or below 80 percent of the area median income.

3. General Program Requirements

(A) Privacy Policy, Terms and Conditions

Applicants will enter personally identifiable information (PII) into Allita to obtain services. Applicants will be required to electronically sign the Privacy Policy, Terms and Conditions within the Allita system. Subgrantees will verify that applicants have electronically signed these sections of the application.

(B) Confidentiality

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

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

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

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

The Oregon Emergency Rental Assistance Program (OERAP) allows clients to directly access the OERAP application portal to apply for rental assistance by inputting their own information. Due to direct client data entry, the focus of the program (rental assistance), the program administrators (not domestic violence providers), and the security level of the Allita system, the OERA Program does not require additional privacy requirements on data entry into the Allita system. The OERAP funds are not used to provide DV services nor are they disbursed to DV providers for specific services. The Allita portal meets all relevant federal and state requirements to comply with data security and Allita is following best practices and protocols to protect data. The use of long passwords and 2 factor authentication adds to the best practices to endure data protection.

However, OHCS recognized that there are additional concerns on behalf of people fleeing domestic violence. Each regional program administrator can work with domestic violence providers to mask personally identifiable information being entered into the Allita system. Treasury does not require the name of the individual receiving rental assistance. The policy and guidance should comply with [Treasury FAQ #14](#) but otherwise program administrators should work with domestic violence providers on privacy considerations

(C) *Service Termination or Denial of Assistance*

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

Subgrantees and subrecipients are required to provide **written notice** to applicants/clients when denied program assistance or assistance is terminated. The notice must include the specific reason(s) for the denial/termination and identify the steps to appeal the Subgrantee’s and subrecipient’s decision. Please note, Allita has the capability to deliver this written notice internally and Subgrantees are expected to utilize Allita for this communication in addition to any other processes the Subgrantee and subrecipients

require. Please see the Allita User Manual for more information about updating applicant status in Allita.

(D) *Grievance and Appeals Process*

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

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

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

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

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

(E) *Nondiscrimination*

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

- Refuse to accept an application for housing assistance or services
- Deny an application for housing assistance or services

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

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

Screening criteria cannot be discriminatory and must be consistently applied. Providers should always accept the first applicant meeting the criteria or prioritization as identified in Allita.

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

(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 LEP requirements are provided in the appendices of this program guidance, “Applicable Rules and Regulations”.

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

Allita will be available in at least the following languages: English, Spanish, Vietnamese, Simplified Chinese and Russian.

(G) Conflict of Interest

Subgrantee and subrecipients must keep records to show compliance with the OERA program conflict of interest requirements.

(1) Organizational

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

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

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

(2) Individual

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

Subgrantees must notify and receive approval from OHCS when adding subrecipients and/or renewing subrecipients. Notification and approval normally occur during the OERA Community Plan submittal process. However, if changes are made outside of the funding application, Subgrantees must submit an Implementation Report Amendment Request form, available on the [Homeless Services Dashboard](#).

(I) Subrecipient Monitoring

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

The subrecipient monitoring and management requirements set forth in [2 CFR 200.331-200.333](#) will apply to such entities.

Consistent with the terms of its OERA Grant Agreement, Subgrantees may also enter into contracts using OERA payments for goods or services to implement OERA programs and must comply with the procurement standards set forth in [2 CFR 200.317-200.327](#) in entering into such contracts.

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

(J) Monitoring Checklist

- Application is entered into Allita and household composition is verified
- Verification that benefits are not duplicated
- Verification that applicant has signed Privacy Policy, Terms and Conditions
- Evidence of rent obligation
 - Lease signed by applicant and landlord, or
 - Attestation by a landlord, or verification of ownership of property or management agent, or
 - Evidence of paying utilities, or
 - Other reasonable documentation – bank statements, check stubs, or other documentation

- Demonstrated risk of homelessness or housing instability
 - Past due utility or rent notice or eviction notice
 - Unsafe or unhealthy living conditions
 - Any other evidence of risk
- Income eligibility based on household’s total income for calendar year 2020 or previous 30 days of monthly income or self-certification of household income.
 - If monthly used, reexamined every 3 months for duration of assistance
- Documentation of COVID eligibility:
 - Qualified for unemployment benefits (by attestation or relevant documentation)
 - Reduction in income (by attestation)
 - Incurred significant costs (by attestation)
 - Financial hardship due to COVID-19 outbreak (by attestation)
- Payment of utility costs supported by a bill, invoice, or evidence of payment to the provider
- Other Expenses must be supported by documentary evidence.
 - Relocation expenses
 - Rental security deposits
 - Rental fees, may include application or screening fees
 - Late fees accrued, if incurred during COVID-19
 - Internet service
 - Hotel/Motels
- Application for additional assistance after three months
- Assistance did not exceed 12 months + 3 months
- Evidence of request cooperation with landlords or utility providers to support assistance being provided directly to applicant:
 - Request made in writing, by mail
 - Three attempts by phone, text, or email, or
 - Landlord confirmation they do not want to participate

4. Applicant Eligibility

Program	COVID-19 Impact	Housing Status Eligibility	Income Eligibility	Eligible Components
OERA	<ul style="list-style-type: none"> • Due to COVID-19 related- factors has experienced: <ul style="list-style-type: none"> ○ Qualified for unemployment benefits 	<ul style="list-style-type: none"> • Demonstrates a risk of experiencing homelessness or housing instability 	<ul style="list-style-type: none"> • At or below 80% AMI w/ priority for those at or below 50% of AMI 	<ul style="list-style-type: none"> • Financial Assistance • Housing Stabilization Services • Admin as allocated to

	<ul style="list-style-type: none"> ○ Reduction or loss of income w/ priority for those unemployed 90 days prior to application ○ Incurred significant costs ○ Experienced financial hardship 			<p>Financial Assistance and Housing Stability Services</p>
--	---	--	--	--

(A) *Assisting with/Modification of the Application*

Subgrantees can complete an application on behalf of a client if assisting that client by telephone or some other means; however, the Subgrantee must have policies and procedures in place that outline when this assistance is applicable. Such policies and procedures must clearly identify how the Subgrantee will document such approval given by the client for this assistance. All documentation of client approval must be available for the purposes of monitoring. Subgrantees may modify an application on a client’s behalf due to errors; however, the client’s acknowledgment of such change must be documented in Allita. For more information on how to modify an application, see the Appendix for Modifying an Application in the Allita Portal Manual.

(B) *Duplication of Benefit*

OERA requires that OERA payments not be duplicative of any other source of rental assistance for the same costs. Federal requirements state that duplication of benefits can be confirmed through an applicant self-attestation process. Allita includes a process that allows the household to attest that they have not received duplicative benefits.

(C) *Household Composition*

A “Household” is defined as one or more individuals who are obligated to pay rent on a residential dwelling. The occupants may be a single family, one person living alone, two or more families living together, or any other group of persons who share living arrangements. This may include roommates who can provide evidence of a rental obligation to another roommate. If you have questions about specific situations, please contact your OHCS Program Analyst.

Therefore, household occupant information must include, at a minimum, the following:

1. Full names and ages of all occupants (whether related or unrelated) living in the residence; and
2. Signature of the primary applicant(s), certifying that the information provided related to the annual household income and occupants is correct.

The term “eligible household” means a household of one or more individuals who are obligated to pay rent on a residential dwelling and:

1. One or more individuals within the household has:
 - a. qualified for unemployment benefits, **or**
 - b. experienced a reduction in household income, incurred significant costs, or experienced other financial hardship due, directly or indirectly, to the novel coronavirus disease (COVID–19) outbreak, which the applicant shall attest in writing (see Justifying Economic Hardship below); **AND**
2. One or more individuals within the household can demonstrate a risk of experiencing homelessness or housing instability, **AND**
3. The household has a household income that is not more than 80 percent of the area median income.

The term “residential dwelling” means any building, structure, or portion thereof which is occupied as, or designed or intended for occupancy as, a residence by one or more individuals.

(D) *Housing Status*

OERA requires that one or more individuals within the household demonstrate a risk of experiencing homelessness or housing instability, which may include:

1. a past due utility or rent notice or eviction notice,
2. unsafe or unhealthy living conditions, or
3. any other evidence of risk.

Subgrantees should adopt policies and procedures addressing how they will determine the presence of unsafe or unhealthy living conditions and what evidence of risk to accept to support their determination that a household satisfies this requirement.

A literally homeless household may qualify if they can demonstrate a “rental obligation”, such as hotel/motel expenses incurred due, directly or indirectly, to the COVID-19 pandemic provided that:

1. the household has been temporarily or permanently displaced from its primary residence or does not have a permanent residence elsewhere;
2. the total months of assistance provided to the household do not exceed 12 months (plus an additional three months if necessary, to ensure housing stability for the household); and
3. the household provides documentation of the hotel or motel stay and meets the other applicable OERA program requirements provided in the guidance.

The cost of the hotel or motel stay would not include expenses incidental to the charge for the room.

Subgrantees covering the cost of such stays must develop policies and procedures detailing under what circumstances they would provide assistance to cover such stays. In doing so,

Subgrantees should consider the cost effectiveness of offering assistance for this purpose as compared to other uses. If a household is eligible for an existing program with narrower eligibility criteria that can provide similar assistance for hotel or motel stays, such as the HUD Emergency Solutions Grant program or FEMA Public Assistance, Subgrantees should utilize such programs **prior to** providing similar assistance under the OERA program.

(E) *Income*

Household income is determined as either the household's total income for calendar year 2020 or the household's monthly income at the time of application. For household incomes determined using the latter method, income eligibility must be redetermined every 3 months. Allita can support this redetermination process (see Allita manual at: <https://www.oregon.gov/ohcs/for-providers/Documents/manuals/OERAP-Allita-Portal-Manual.pdf>)

OERA-provided services require applicants to be low income; i.e., gross household income at or below 80% of area median income; however, applicants below 50% of area median income must receive priority. Prioritization occurs automatically with the Allita system. Find current income limits at: <https://www.huduser.gov/portal/datasets/il.html>.

Income from all individuals in the household who are 18 years of age and older must be included in the household income calculation. All types of income must be reported. This includes seasonal work, workers compensation and unemployment if they are actively receiving these types of compensation.

Income includes:

- (1) Gross wage amount earned before deductions are subtracted for insurance, taxes, Medicare, fees, etc. Include the last 30 days of paystubs individually for each household member 18 years of age or older or the filed 2020 IRS Form 1040.
- (2) SSI/SSDI/VA Pension/VA Disability includes the monthly payment from the Social Security Administration and includes Medicare/Medicaid benefit payments.
- (3) Self-Employment includes the last 30 days of income, which can be shown from bank statements to verify deposits.
- (4) Income for non-residents. Obtain contact information from non-resident income provider and request signed notice indicating the amount and frequency of the income contribution.

Child tax credits that are paid in advance by the U.S Treasury are like Stimulus Checks or the Earned Income Tax Credit are not counted as income for any HUD/OHCS programs or ODHS programs such, as SNAP or OHP.

If a household has earned income, such as cash payments, but are unable to provide documents or other traditional means of showing income, the household may use a self-certification form. This form can be uploaded to the online application as a "paystub" if no other paystub is available or as documentation for "other income" on the income bubble of the OERAP application. The form can also be included as an addendum with a paper application. The Certification of Income–Self Verification form must be completed for each

member of the household that is unable to provide documents of their income (for instance, if two members of the household get paid in cash/worked for a business that no longer exists, two completed Certification of Income-Self Verification forms would be needed, one completed by each household member. A fillable .pdf version of this form is available on the OERAP website at: <https://www.oregon.gov/ohcs/housing-assistance/Pages/emergency-rental-assistance.aspx>.

(F) COVID-19 Impact Eligibility Criteria

OERA services require applicants to meet one of the following COVID-19 impacts:

- (1) Qualified for unemployment benefits; **OR**
- (2) Experienced a reduction in household income; **OR**
- (3) Incurred significant costs; **OR**
- (4) Experienced other financial hardship due, directly or indirectly, to the COVID-19 outbreak.

If Subgrantee relies on category (1) above for this determination, Subgrantee may rely on either a written attestation signed by the applicant or other relevant documentation regarding the household member's qualification for unemployment benefits.

For Criteria (2), (3) and (4), applicants may use a written attestation that is within the Allita System to ensure that each applicant is meeting the COVID-19 Impact eligibility criteria.

(G) Prioritization

OERA funding is prioritized to applicants based on the following characteristics:

- Income at or below 50% of area median income;
- Households with one or more members that have been unemployed for at least 90 days;
- Household size;
- The number of months a household is delinquent on rent, between 1-15 months;
- The Urban Institute ERAP [Priority Index](#): This tool was created by the Urban Institute and is based on three primary indexes: housing instability risk factors, COVID-19 impact, and equity data. Each index is tallied into a total score and then applied at the census tract level for each Applicant based on the location of their rental address;
- Wildfire impact.

Every Applicant will receive a prioritization score based on the above factors using the data the client inputs in the application. This score will be automatically generated by the Allita software. Higher scores will move to the top of the queue in the order that they are received and will be placed according to score

(H) Citizenship

OERA funds have no citizenship requirements and do not trigger "Public Charge" determinations according to the legal opinion generated by the National Low-Income Housing Coalition, available here: https://nlihc.org/sites/default/files/FAQs_Eligibility-for-

[Assistance-Based-on-Immigration-Status.pdf](#). Requesting information about someone's citizenship status is not allowed for the OERA program; although Allita does allow for the entry of Social Security Numbers by the client.

(I) *Residency*

While OERA has no residency requirements related to the housing status of households, no assistance may be provided to households who reside outside of Oregon and is intended to serve residents of Oregon. Applicants who claim another state as their primary domicile should seek assistance from that state's ERA program.

(J) *Eligibility Documentation*

Various means of documentation is acceptable so that Subgrantees may extend this emergency assistance to vulnerable populations without imposing undue documentation burdens. Given the challenges presented by the COVID-19 pandemic, Subgrantees may be flexible as to the form of documentation they require by permitting photocopies or digital photographs of documents, e-mails, or attestations from employers, landlords, caseworkers, or others with knowledge of the household's circumstances. Wet signatures should not be required for any documentation.

Subgrantees must require all applications for assistance to include an attestation from the applicant that all information included is correct and complete. In all cases, Subgrantees must document their policies and procedures for determining a household's eligibility to include policies and procedures for determining the prioritization of households in compliance with the ERA statute and maintain records of Subgrantee's determinations.

Subgrantees must have controls in place to ensure compliance with their policies and procedures and prevent fraud. Subgrantees must specify in their policies and procedures under what circumstances they will accept written attestations from the applicant without further documentation to determine any aspect of eligibility or the amount of assistance, and in such cases, Subgrantees must have in place reasonable validation or fraud prevention procedures to prevent abuse.

The following categories list out what documents may be used to meet each part of the application process and where self-certification is allowed:

(1) Identification for the Head of Household

- State issued program ID or license (name must be consistent with OERA application and supporting documentation)
- An employment identification card
- Certificate of marriage or license
- Copy of the certified divorce decree
- Copy of a certified, court-ordered maintenance award (if legal) or a notarized statement declaring separation
- Single or Joint bank accounts, certified purchases or loans that show residential address
- Credit report showing residence and single or joint financial activity

- Jail ID
- Passport
- Military ID
- VA Medical card
- DD214
- DHS Benefits ledger
- Social service ID
- Letter from a non-profit or government agency attesting to applicant's identification

(2) Proof of Rental Householder

- Written Lease/Rental Agreement
- Self-Attestation

(3) Proof of Residency for Head of Household (address must match rental property address). To verify residence, provide ONE of the following:

- Written Rental/Lease Agreement
- State issued program ID or license (must show address consistent with OERA application)
- Official letter from third party showing name and address (including letter from Landlord, Governmental agency, financial institution, medical institution, or school)
- Government issued library card (must show address)
- Utility statements from providers

(4) Proof of Income Eligibility

- May provide documentation on an annual or monthly basis as explained in the OERA application
- Written Attestation of Income (low/no income/unverifiable income/cash/etc.)
- Examples – 2020 Tax Return, pay stubs, unemployment benefits statements

(5) Proof of COVID impact that Since March 13, 2020

At least one member of the household has either:

- a) Qualified for unemployment, or
- b) Experienced a reduction in household income, incurred significant costs, or experienced other financial hardship due directly or indirectly to the COVID-19 Pandemic.

Examples of acceptable documentation include:

- A copy of household member(s) notification of job loss/termination from employer during the eligible pandemic period (March 13, 2020 to present); or

- A copy of household member(s) notification of furlough from employer during the eligible pandemic period (March 13, 2020 to present); or
- A copy of household member(s) notification confirming reduction in hours and/or pay during the eligible pandemic period (March 13, 2020 to present); or
- A copy of household member(s) application during the eligible pandemic period (March 13, 2020 to present) and/or approval for Unemployment Insurance benefits; or
- A signed self-certification that includes the name of the household member who is self-employed, the name and nature of the business, and narrative confirming economic impact on self-employment during eligible pandemic period (March 13, 2020 to present); or
- Self-Certification Form that:
 - i. A member of the household is sick with COVID-19 or caring for a household or family member who is sick with COVID-19 resulting in a reduction of income;
 - ii. A member of the household has experienced extraordinary out-of-pocket childcare expenses due to school closures, medical expenses, or health care expenditures stemming from COVID-19 infection of a member of the household;
 - iii. A member of the household is acting in compliance with a recommendation from a government health authority to stay home, self-quarantine, or avoid congregating with others during the state of emergency, resulting in a reduction of income;
 - iv. A member of the household has had reasonable expenditures stemming from government ordered emergency measures; **or**
 - v. A member of the household has experienced additional factors relevant to the tenant's reduction in income as a result of the COVID-19 emergency.

(6) Proof that Since March 13, 2020, at Least one Member of the Household Can Demonstrate a Risk of Experiencing Homelessness or Housing Instability

- Past due utility notice
- Eviction notice
- Letter from a landlord stating they missed rent
- Evidence of unhealthy living conditions – applicant could attest to living in an unsafe or unhealthy living condition with documentation attached such as photographs, other documentation and/or an attestation from a third party that the household is living in an unsafe or unhealthy living condition
- Sharing housing of others due to economic crisis
- Attestation of spending more than 30% of your income on housing costs
- Other acceptable ways of establishing risk of homelessness or instability?

- (7) A copy of the past due utility bills (electric, gas, water, sewer, trash, other energy costs, such as propane or fuel oil) for which the household is requesting assistance, if any.

5. Allowable Program Components and Expenditures

Allowable expenses must be related to housing and be incurred due directly or indirectly to COVID-19.

Program expenditures must be supported by documentation that demonstrates how the expenditure aligns with the allowable component. Applicant expenses incurred after September 30, 2022, are not allowed for OERA payment.

OERA assistance may not be provided for the purposes of mortgage payments or utilities for property owned by an applicant. OERA may only be provided to eligible households, which is defined to include only households that are obligated to pay rent on a residential unit.

Subgrantees must offer the full suite of services allowable under OERA but do have discretion to serve a client using other funds (for instance, STARR or LIHEAP) consistent with those other program criteria. Please see the Allita manual on the workflow to withdraw an application because of being able to serve them using other funds.

(A) Financial Assistance

The Financial Assistance category is only for expenses paid on behalf of eligible households. At least 90 percent of the award must be used for the following eligible Financial Assistance activities, based on Treasury guidance:

Expenditure Type	Restriction, Limitation, Guidance
Rent Payments and Arrears	<p>Eligible households may receive up to 12 months of rent assistance, plus an additional 3 months, if the Subgrantee determines the extra months are needed to ensure housing stability and Subgrantee funds are available.</p> <p>Payment of prospective (advance) rent is limited to 3 months:</p> <ol style="list-style-type: none"> 1. Subject to the availability of remaining funds currently allocated to Subgrantee, and 2. Based on a subsequent application for additional, provided that the total months of assistance to household does not exceed 12 months (plus an additional 3 months, if necessary, to ensure housing stability). <p>Assistance must be provided to reduce an eligible household’s rent arrears before the household may receive assistance for future rent payments.</p>

	<p>Once a household’s arrears are reduced, Subgrantee may only commit to providing future assistance for up to 3 months at a time.</p> <p>Households must reapply for additional assistance at the end of the 3-month period, if needed, and the overall time limit for assistance is not exceeded.</p> <p>Rent arrears can be for rent incurred after March 13, 2020. There will be no pre-payment of rent past September 30, 2022.</p>
<p>Tenant Portion of Subsidized Rent</p>	<p>Rent payments that are paid on behalf of a tenant who is living in subsidized housing can be made for the tenant portion of the rent only. The portion of rent that is already subsidized (for instance, by a Section 8 Voucher) is not eligible for OERA payment. Please work closely with the Housing Authority or other entity providing the subsidy to ensure that no duplication of benefits is occurring.</p>
<p>Manufactured Home Rental Payments and Lot Rental Payments and Arrears</p>	<p>Rental payments for either the manufactured home and/or the parcel of land the manufactured home occupies are eligible for financial assistance.</p> <p>Lot Rental Payments and Arrears includes RV/Travel Trailer space rent when unit used as permanent housing.</p> <p>Households renting manufactured housing and/or the parcel of land the manufactured home occupies may also receive assistance for utilities and other expenses related to housing, as detailed in Utility Payments.</p>
<p>Rent-To-Own Payments and Arrears</p>	<p>A Subgrantee may provide financial assistance to households that are renting their residence under a “rent-to-own” agreement, under which the renter has the option (or obligation) to purchase the property at the end of the lease term, provided that a member of his or her household:</p> <ol style="list-style-type: none"> 1. Is not a signor or co-signor to the mortgage on the property; 2. Does not hold the deed or title to the property; <p>AND</p> <ol style="list-style-type: none"> 3. Has not exercised the option to purchase and will not do so while receiving OERA assistance.
<p>Hotel/Motel Expenses</p>	<p>The cost of a hotel or motel room occupied by an eligible household may be covered <u>provided that</u>:</p> <ol style="list-style-type: none"> 1. The household has been temporarily or permanently displaced from their primary

	<p>residence or does not have a permanent residence elsewhere;</p> <p>2. The total months of assistance provided does not exceed 12 months (plus an additional 3 months, if necessary, to ensure housing stability); AND</p> <p>3. Documentation of the hotel or motel stay is provided, and all other applicable OERA program requirements are met.</p> <p>The cost of the hotel or motel stay does not include expenses incidental to the charge for the room and such expenses are not eligible for OERA funds.</p> <p>Subgrantees covering the cost of such stays must develop policies and procedures detailing under what circumstances they would provide assistance to cover such stays. In doing so, Subgrantees should consider the cost effectiveness of offering assistance for this purpose as compared to other uses.</p> <p>If a household is eligible for an existing program with narrower eligibility criteria that can provide similar assistance for hotel or motel stays, such as the HUD Emergency Solutions Grant program or FEMA Public Assistance, Subgrantees should utilize such programs prior to providing similar assistance under the OERA program.</p> <p>Please note, Hotel/Motel costs are currently categorized under “Housing Fees” when entering into Allita.</p>
Rental Security Deposits	Rental security deposits may be provided if a household has been temporarily or permanently displaced due to the COVID-19 outbreak.
Rental Fees	<p>Rental fees, which may include application or screening fees, if a household has been temporarily or permanently displaced due to the COVID-19 outbreak are allowable, as well as any other fees that are directly tied to housing stability and that are charged by the landlord.</p> <p>Reasonable accrued late fees (if not included in rental or utility arrears and if incurred due to COVID-19) are allowable.</p>
Utility Payments and Arrears	<p>Utilities are separately stated charges related to the occupancy of rental property.</p> <p>OERA may cover up to twelve (12) months of eligible utility arrears for service on or after March 13, 2020. Utility arrears must be demonstrated by a</p>

	<p>current overdue notice or utility bill (within 60 days of application). If the applicant cannot provide a current overdue notice or utility bill. Subgrantees may verify the total amount owed by contacting the utility and completing a <i>Utility Verification Form</i>. Under OERA, a utility shut-off notice is not required to make a payment. Once a household's arrears are reduced, Subgrantee may only commit to providing future utility assistance for up to 3 additional months.</p> <p>The following utilities are eligible:</p> <ol style="list-style-type: none"> 1. Electricity 2. Natural Gas 3. Water/Sewer 4. Garbage Service <p>OERA funds may also pay for one delivery of heating fuel such as oil, propane, and wood pellets or an arrearage for such fuel.</p> <p>If the applicant's service has been shut off or if the applicant needs to pay down a balance to start service at a new location, the Subgrantee may contact the utility to determine the minimum amount required to restore service.</p> <p>Payments to public utilities are permitted. All payments for utilities and home energy costs must be supported by a bill, invoice, and evidence of payment to the provider of the utility or home energy service.</p> <p><i>Utilities and home energy costs that are covered by the landlord will be treated as rent and should be submitted as utilities.</i></p>
<p>Internet</p>	<p>Internet service provided to a residence is related to housing and is in many cases a vital service that allows renters to engage in distance learning, telework, and telemedicine and obtain government services.</p> <p>However, given that coverage of Internet would reduce the amount of funds available for rental assistance. Internet expenses are limited to:</p> <ol style="list-style-type: none"> a. If applicant is able to provide documentation of internet service, in the name of a member of the household, the client may receive a maximum of <u>one-time benefit payment of \$300</u>. (Note: OHCS allows for paying up to 3 months' prospective rent and housing related cost, but this is to

	<p>CAA/grantee’s discretion). When the qualified internet service assistance amount (the arrears portion must be evidenced by bill/invoice; The prospective portion would be calculated based on the billed monthly rate) is lower than the maximum allowed amount \$300, then the lower amount should be paid.</p> <p>b. The <u>applicant must</u> self-certify that internet service is needed to:</p> <ul style="list-style-type: none">(1) engage in distance learning(2) telework(3) telemedicine(4) obtain government service, or(5) job search <p>Subgrantees must outreach Internet vendors to pay directly on behalf of eligible applicant consistent with the outreach requirements for utility vendors and landlords (See section (D) <i>Landlord or Utility Will Not Accept Payment</i>).</p>
--	---

(B) *Housing Stability Services*

No more than 10 percent of the award amount may be used for Housing Stability Services.

Housing stability services related to the COVID-19 outbreak include those that enable eligible households to maintain or obtain housing. Such services may include:

- (a) housing counseling,
- (b) fair housing counseling,
- (c) case management related to housing stability,
- (d) housing related services for survivors of domestic abuse or human trafficking,
- (e) attorney’s fees related to eviction proceedings, and
- (f) specialized services for individuals with disabilities or seniors that supports their ability to access or maintain housing.

In general, these types of services may assist with delivering a variety of services that help households maintain or obtain housing. For Case Management related to housing stability, the case managers may provide intake supports into the OERA program, assisting households with the process of applying for the program amongst other tasks.

Subgrantees using OERA funds for housing stability services must maintain records regarding such services and the amount of funds provided to them.

(C) *Administration –*

No more than 8.5 percent of total award amount may be used for Administrative Costs, both direct and indirect, including those allowed for subrecipient organizations with

whom the Subgrantee contracts. Administrative costs must be attributed to either costs associated with provision of financial assistance or costs associated with housing stability services, not to exceed 8.5% of either category. There is an expectation that administrative funds will be shared with subrecipients commensurate to the services provided through the program by subrecipients.

State resources may be used to subsize administration of the OERA program, including EHA and the federal resource of CSBG.

Subgrantees may apply their negotiated indirect cost rate to the award but only to the extent that the total of the amount charged pursuant to that rate and the amount of direct costs charged to the award does not exceed 8.5% of the amount of the award.

To the extent Administrative costs are readily allocable to one or the other of these categories, your organization may assume an allocation of the relevant Administration costs (direct and indirect) of 90% to Financial Assistance and 10% to Housing Stability Services.

If Administration costs can accurately and certainly be measured for each category, then relevant costs can be allocated to each category not to exceed 8.5% of the total award when the two categories of administration dollars are added together.

If your organization decided to spend the entire award to only provide Financial Assistance, the total allocable Administration Costs, or 8.5% of the award would be attributable to administrative costs for Financial Assistance.

For example: A total grant of \$14,960,927 is awarded. The award is split between Financial Assistance (direct landlord/utility payments) of 90% - or \$13,464,834.30 and Housing Stability Services of 10% - or \$1,496,092.70. Of that split, administrative funds can be provided as 8.5% of Financial Assistance and 8.5% of Housing Stability Services. Total administrative funds are \$1,271,678.80, while \$13,689,248.21 can be expended on program costs (Financial Assistance and Housing Stability Services).

			Admin 8.5%	Program
Financial Assistance	90%	\$ 13,464,834.30	\$ 1,144,510.92	\$ 12,320,323.38
Housing Stability Services	10%	\$ 1,496,092.70	\$ 127,167.88	\$ 1,368,924.82
Total Grant		\$ 14,960,927.00	\$ 1,271,678.80	\$ 13,689,248.21

All amounts billed to administration must be supported by actual costs.

Direct program staff do not have to be 100% dedicated to OERA work, but can charge their time directly to the programs they are working on- based on time spent working on those programs/cost objectives. If working on OERA and other programs, staff can charge their time accordingly. If working 100% on OERA, staff can charge 100% of their time to OERA

Administrative staff can charge their costs directly to various programs as long as those costs are charged consistently the same across all federal awards. The salaries of administrative and clerical staff should be treated as Indirect cost, but may be charged as

Direct costs only if **ALL** conditions outlined in **2 CFR 200.413**, as listed below are met as listed below:

- Services are integral to a project or activity;
- Individuals involved can be specifically identified with project or activity;
- Costs are explicitly included in budget or have the prior written approval of awarding agency; and
- **The costs are not also recovered as indirect costs.**

Admin staff paid by Financial Assistance Admin may occasionally processes rent for CVRRP CARES or STARR, which would be allowable if their costs are allocated consistently to all programs which benefited their work and meet all conditions outlined in 2CFR200.413 – see above.

If Subgrantee is allocating Administrative costs indirectly from an Indirect cost pool(s), Subgrantee may charge the OERA grant with indirect cost allocation, so long as the total Indirect and direct Admin costs charged or allocated to the OERA grant does not exceed 8.5% of the total award.

Allowable Administrative costs include, but are not limited to:

- Senior executive management personnel salaries and benefits (unless they are directly involved in program operations), administrative staff travel costs;
- General services such as accounting, budget development, personnel, contracting, marketing, audit services and insurance;
- Board expenses (excluding meals);
- Organization-wide membership fees and dues specific to homeless systems and programs;
- General Subgrantee 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);
- Equipment rental/purchase, insurance, utilities, and IT costs that are not program specific but relate to the administration of the Subgrantee as a whole;
- Directly allocable costs such as marketing and communications for the program; and
- Allocated costs, consistent with a Subgrantee Cost Allocation Plan.

(D) *Landlord or Utility Will Not Accept Payment*

What to do if a landlord or utility will not accept payment from the Subgrantee or Subrecipient: The Treasury expects that in general, rental and utility assistance can be provided most effectively and efficiently when the landlord or utility provider participates in the program.

Note: IRS regulations generally require a W-9 for certain vendor payments. Please consult with Subgrantee’s internal processes for W-9 requirements for Subgrantee to ensure meeting the minimum requirements as outlined by the IRS. Allita can collect W-9 information from landlords to easily permit you to make payments, as outlined within the

Allita Manual (see Allita manual at: <https://www.oregon.gov/ohcs/for-providers/Documents/manuals/OERAP-Allita-Portal-Manual.pdf>).

Subgrantees must make reasonable efforts to obtain the cooperation of landlords and utility providers to accept payments from the ERA program. Outreach will be considered complete if:

(a) a request for participation is sent in writing, by mail, to the landlord or utility provider, and the addressee does not respond to the request within **seven** calendar days after mailing;

(b) the grantee **has made at least three attempts, on three separate days**, by phone, text, and/or e-mail over a **five** calendar-day period to request the landlord or utility provider's participation; or

(c) a landlord confirms in writing that the landlord does not wish to participate.

The final outreach attempt or notice to the landlord must be documented.

The cost of contacting landlords would be an eligible administrative cost. Eligible OERA expenses unable to be paid directly to a landlord or utility are required to be paid directly to the tenant with clear documentation of the above steps being taken. The direct-to-client payment does not require further documentation that the client paid the cost for which the dollars were intended.

(E) Documenting Rent and Rent Arrears

Subgrantees must obtain, if available, a current lease, signed by the applicant and the landlord or sublessor that identifies the unit where the applicant resides and establishes the rental payment amount. If a household does not have a signed lease, documentation of residence may include evidence of paying utilities for the residential unit, an attestation by a landlord who can be identified as the verified owner or management agent of the unit, or other reasonable documentation as determined by the Subgrantee.

In the absence of a signed lease, evidence of the amount of a rental payment may include bank statements, check stubs, or other documentation that reasonably establishes a pattern of paying rent, a written attestation by a landlord who can be verified as the legitimate owner or management agent of the unit, or other reasonable documentation as defined by the Subgrantee in its policies and procedures.

Written Attestation: If an applicant is able to provide satisfactory evidence of residence but is unable to present adequate documentation of the amount of the rental obligation, Subgrantees may accept a written attestation from the applicant to support the payment of assistance up to a monthly maximum of 100% of the greater of the Fair Market Rent or the Small Area Fair Market Rent for the area in which the applicant resides, as most recently determined by HUD and made available at: <https://www.huduser.gov/portal/datasets/fmr.html>.

In this case, the applicant must also attest that the household has not received, and does not anticipate receiving, another source of public or private subsidy or assistance for the rental costs that are the subject of the attestation. This limited payment is intended to provide the most vulnerable households the opportunity to gather additional documentation or negotiate with landlords in order to avoid eviction. Such assistance may only be provided for three months at a time. A Subgrantee must obtain evidence of rent owed consistent with the above after three months in order to provide further assistance to such a household; **Treasury expects that in most cases the household would be able to provide documentation of the amount of the rental obligation in any applications for further assistance.**

6. Financial Management

(A) *CFDA*

The Catalog of Federal Domestic Assistance (CFDA), an E-Gov initiative managed by the General Services Administration (GSA), is a list of all federal financial assistance and nonfinancial assistance programs available to a variety of applicants. CFDA numbers are the system for identifying federal programs. The CFDA number for OERA is: 21.023.

(B) *Use of Allita*

The Allita System is a web-based centralized data system designed to meet business-processing needs. Allita will be used for the prioritization, application processing, eligibility determination and reporting for the OERA program. It will not take the place of the subgrantee's fiscal system. Allita is required for all client transactions for this program, but a paper application or other method may be used in the case of someone who cannot utilize the system directly. Subgrantee staff would then need to manually enter the paper application into Allita to be prioritized and processed. Subgrantee staff will receive training and technical assistance from OHCS.

Please see the OERA Allita Manual for more information on the use of the system (<https://www.oregon.gov/ohcs/for-providers/Documents/manuals/OERAP-Allita-Portal-Manual.pdf>).

(C) *Advance Requests for Funds*

Subgrantee may request and be paid in advance, provided it maintains or demonstrates the willingness to maintain both written procedures that minimize the time elapsing between the transfer of funds and disbursement, and financial management systems that meet the standards for fund control and accountability as established in this part.

Advance payments to a subgrantee must be limited to the minimum amounts needed and be timed to be in accordance with the actual, immediate cash requirements of the subgrantee in carrying out the purpose of the approved program or project. The timing and amount of advance payments must be as close as is administratively feasible to the actual disbursements by the subgrantee for direct program or project costs and the proportionate share of any allowable indirect costs.

Advance requests for OHCS funds are accepted on most grants. Some limitations for weatherization jobs not yet complete exist, as well as a program submission for HOME TBA.

An advance can be requested using the field labeled “Projected” in OPUS on the AGR screen.

The need for an advance must be justified by a short comment in the AGR “Comment” field, or your comment can advise to “see attached”. The comment and/or the attachment needs to provide enough detail to justify your request and demonstrate the impact to your operations and cash flow. Below are some acceptable methods that can be used to justify an advance request:

- Wait list total, or expected demand, plus additional funds to serve clients over a specified time period. Analysis should be provided on how any additional funds were calculated, expected number of households and amount per household.
- Amount needed to provide to one or more sub-recipients, with an analysis of the calculated amount (projected volume or demand for sub-recipient, number of households, etc.), while factoring in timelines for invoicing and processing
- Energy assistance batches not yet paid by your agency. The energy module batch number or numbers are sufficient for the comment.
- Funds to meet your upcoming payroll
- Client intake completed in another system, or applications in process of approval

We want to be mindful of your operational needs and cash flow as you work to deliver critical programs. If you have additional questions or would like to talk through the operational and cash flow needs you’re experiencing, you may contact Carol Wagner, Carol.Wagner@oregon.gov or by phone at 971-273-9235.

(D) Budget Change Requests and Implementation Report Amendments

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

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

Implementation Report Amendments are required when there is a shift in program delivery and/or scope of work. All Implementation Report Amendments require OHCS approval by submitting an Implementation Report Amendment Request through the appropriate Smartsheet form. Find the amendment request form on the OHCS HSS Dashboard at: <https://app.smartsheet.com/b/publish?EQBCT=8a215621578a4f76ae98113d719d5e64>.

Subgrantees must notify, within 30 days, and receive approval from OHCS when adding subrecipients. Notification and approval normally occur during the OERA Grant Agreement funding application process; however, if changes are made outside of the funding application, Subgrantees must notify OHCS and obtain approval by submitting an Implementation Report Amendment Request through the appropriate Smartsheet form (<https://app.smartsheet.com/b/publish?EQBCT=8a215621578a4f76ae98113d719d5e64>).

(E) Funds Spend Down

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

Subgrantees submit spenddown targets to OHCS within the timeline specified by OHCS and in form and format approved by OHCS. OHCS will review Subgrantee’s grant spending in accordance with Subgrantee’s OERA Grant Agreement and OHCS policy and will review expenditures for OERA-funded program twice per month.

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

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

7. Data Requirements

(A) Data Entry

Subgrantees and their subrecipients are required to enter OERA related data into the Allita System according to the processes outlined in the Allita Manual.

At each point along the way, an applicant in Allita will reflect different Status markers indicating where they are along the process. **It is imperative that Subgrantees and subrecipients update the status in Allita as soon as administratively feasible to ensure accurate reporting and communication to clients.** More information about how to update an applicant’s status is available see the Allita manual.

Please see the OERA Allita Manual for a complete walkthrough of the system as well as accompanying video materials available: <https://www.oregon.gov/ohcs/housing-assistance/Pages/emergency-rental-assistance.aspx>

(B) Required Data Elements

Allita is tailored to meet the required data collection elements of the Treasury guidance for ERA. The Allita application will automatically be able to collect and report the following information that is required for reporting to the Treasury.

ERA 1 Reporting Elements and Definitions		
Number	Element	Definition
1	Number of unique households that completed and submitted an application for ERA program assistance	The number of unique households that submitted a complete application, as reasonably determined by the ERA grantee, for ERA assistance in the reporting period. Note: The phrase “unique households” means that a household that received assistance more than once in a particular quarter should only be counted one time for reporting purposes.

2	Number of unique households that received ERA assistance of any kind	The number of unique households whose rent and/or utility/ home energy payments were fully or partially paid by the ERA grantee under the federal ERA program plus the number of households that received housing stability services administered by the ERA grantee in the reporting period.
3	Number of unique households that received the following types of ERA assistance (where applicable):	
	(a) Rent (#)	The number of unique households for whom the ERA grantee paid at least one rent payment under the federal ERA program in the reporting period.
	(b) Rental arrears (#)	<p>The number of unique households for whom the ERA grantee paid any amount of rental arrears in the reporting period.</p> <p>This field is the sum of the number of households for which the ERA grantee paid rental arrears directly to their landlord or eligible entity under the federal program plus the number of households to which the ERA grantee directly paid rent arrears payments in the reporting period.</p>
	(c) Utilities/home energy bills (#)	<p>The number of unique households for whom the ERA grantee paid any portion of at least one utility or home energy bill under the federal ERA program in the reporting period.</p> <p>This field is the sum of the number of households for which the ERA grantee made utility or home energy bill payments directly to the provider or another person plus the number of households that received payments from the ERA grantee for their utility or home energy bill payments in the reporting period.</p>
	(d) Utilities/home energy costs arrears (#)	<p>The number of unique households for whom the ERA grantee paid any amount of utility and home energy costs arrears under the federal ERA program in the reporting period.</p> <p>This field is the sum of the number of households for which the ERA program paid utility or home energy cost arrears directly to the utility or home energy provider or another person plus the number of households to which the ERA program directly paid utility or home energy arrears payments in the reporting period.</p>
	(e) Other expenses related to housing (#)	<p>The number of unique households for whom the ERA grantee paid any amount for other approved housing expenses during the reporting period (not including rent, rent arrears, utility or home energy costs and home energy costs arrears) as identified in Treasury's FAQ No. 7 at:</p> <p>https://home.treasury.gov/system/files/136/ERAFrequently-Asked-Questions_Pub-3-16-21.pdf.</p>

	(f) Housing stability services (#)	<p>The number of unique households that received any housing stability services provided under the Treasury’s ERA program during the reporting period.</p> <p>This includes housing stability services provided directly by the ERA grantee or by sub-recipient entities (such as contractors or sub-awardees).</p>
4	Number of unique households that received ERA assistance with household incomes of less than 30% of the area median income (AMI) (#)	<p>The number of unique households with incomes less than or equal to 30% of the area median income that received any form of ERA assistance in the reporting period, as defined by the US Department of Housing and Urban Development (HUD).</p> <p>HUD’s area median income limits can be accessed here: https://www.huduser.gov/portal/datasets/il.html</p>
5	Number of unique households that received ERA assistance with household incomes of between 30% and 50% of the area median income (AMI)	<p>The number of unique households with incomes greater than 30% but less than or equal to 50% of the area median income as defined by the US Department of Housing and Urban Development (HUD) that received any form of ERA assistance in the reporting period.</p> <p>HUD’s area median income limits can be accessed here: https://www.huduser.gov/portal/datasets/il.html</p>
6	Number of unique households that received ERA assistance in the reporting period that are greater than 50% AND between 50% and 80% of the area median income (AMI).	<p>The number of unique households with incomes greater than 50% but less than or equal to 80% of the area median income as defined by the US Department of Housing and Urban Development (HUD) that received any form of ERA assistance in the reporting period.</p> <p>HUD’s area median income limits can be accessed here: https://www.huduser.gov/portal/datasets/il.html</p>
7	Total number of rental payments paid by the ERA grantee (not counting rental arrears).	<p>The total number of rental payments paid by the ERA grantee to or for participating households during the reporting period. Count each month’s payment to the same household individually. Do not count payments for rental arrears.</p>
8	Total number of utility/home energy bill payments paid by the ERA grantee (not including arrears payments).	<p>The total number of utility/ home energy bill payments paid by the ERA grantee to or for participating households during the reporting period. Count each month’s payment to the same household individually. Do not count payments for utility or home energy bill arrears.</p>
9	Total dollar amount of ERA grant funds paid by the ERA grantee to or for participating households .	<p>The total dollar amount of ERA grant funds the ERA grantee paid to or for participating households during the reporting period, including payments for rent; rental arrears; utility and home energy costs; utility and home energy cost arrears; and other housing expenses.</p> <p>This does not include amounts paid for housing stability services.</p>

10	Total dollar value of approved ERA applications that have not yet been paid.	<p>Total ERA grant dollars the ERA grantee expects to pay to or for households for rent, rent arrears, utility and home energy bills, utility and home energy arrears, and other housing expenses.</p> <p>This amount does not include amounts approved and expected to pay for housing stability services.</p> <p>Note: Calculate the amount expected to be paid as defined by the ERA grantee’s policies and procedures.</p>
11	Total dollar amount expended by the ERA grantee for administrative expenses.	<p>Total ERA grant dollars that the ERA grantee expended (incurred or paid as a liability) for administrative expenses during the reporting period.</p> <p>This does not include amounts expended for housing stability services.</p> <p>Note: for costs to have been incurred as defined, performance of the service or delivery of the good(s) must have occurred.</p>
12	Total dollar value of approved ERA administrative expenses that have not yet been expended.	<p>Total dollar amount of ERA grant funds that the ERA grantee has not yet expended (incurred or paid as a liability), for administrative expenses.</p> <p>This does not include amounts approved and expected to pay for housing stability services.</p> <p>Note: Calculate the amount expected to be paid as defined by the ERA grantee’s policies and procedures.</p>
13	Total dollar amount expended by the ERA grantee for housing stability services .	<p>Total amount of the ERA grant funds that the ERA grantee expended (incurred as a liability) for housing stability services during the reporting period.</p> <p>This includes housing stability services provided directly by the ERA grantee or by subrecipient entities or contractors.</p> <p>Note: for costs to have been incurred as defined, performance of the service or delivery of the good(s) must have occurred.</p>
14	Total dollar value of approved ERA housing stability services that have not yet been expended.	<p>Total ERA grant dollars that the ERA grantee has not yet expended (incurred or paid as a liability), for housing stability services.</p> <p>This includes housing stability services provided directly by the ERA grantee or by subrecipient entities or contractors.</p> <p>Note: Calculate the amount expected to be paid as defined by the ERA grantee’s policies and procedures. Typically, for costs to have been incurred, performance of the service or delivery of the good(s) must have occurred. This question is intended to capture pre-expenditure amounts.</p>

8. Records Requirements

(A) **Case Files**

Documentation of client eligibility and services received are retained as part of the Allita system. Allita is the required system for documenting client case files, but Subgrantees can document client eligibility outside of the system if they choose. HMIS is not required for the OERA program; however, depending on the business needs of the Subgrantee *may* enter data in HMIS as well as Allita.

Documentation will be the basis of OHCS monitoring to ensure Subgrantee and subrecipients are following program requirements and regulations.

(B) **Records Access**

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

(C) **Records Retention**

Subgrantees and subrecipients shall retain all program records pertinent to client services and expenditures incurred under OERA 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 and OERA program guidance. Information retained in Allita will comply with these standards and requirements.

Find the State Agency General Records Retention Schedules at the Oregon State Archives: (https://sos.oregon.gov/archives/Pages/records_retention_schedule.aspx).

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

9. Applicable Rules and Regulations

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

1. U.S. Treasury Statutory Provisions:
https://home.treasury.gov/system/files/136/Excerpt_Section-501_PL-115-260.pdf
2. U.S. Treasury Frequently Asked Questions: https://home.treasury.gov/system/files/136/ERA-Frequently-Asked-Questions_Pub-3-16-21.pdf
3. U.S. Treasury Emergency Rental Assistance website: <https://home.treasury.gov/policy-issues/cares/emergency-rental-assistance-program>
4. OAR 166-300 (Retention Schedule):
https://sos.oregon.gov/archives/Pages/records_retention_schedule.aspx.
5. Limited English Proficiency federal interagency website can be found at: <http://www.lep.gov/> and guidance and additional materials can be found at: https://www.hud.gov/program_offices/fair_housing_equal_opp/limited_english_proficiency_0
6. Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards, [2 C.F.R. Part 200](#), other than such provisions as Treasury may determine are inapplicable to this Award and subject to such exceptions as may be otherwise provided by Treasury. Subpart F – Audit Requirements of the Uniform Guidance, implementing the Single Audit Act, shall apply to this award.
7. Universal Identifier and System for Award Management (SAM), [2 C.F.R. Part 25](#) and pursuant to which the award term set forth in Appendix A to 2 C.F.R. Part 25 is hereby incorporated by reference.
8. Reporting Subaward and Executive Compensation Information, [2 C.F.R. Part 170](#), pursuant to which the award term set forth in Appendix A to 2 C.F.R. Part 170 is hereby incorporated by reference.
9. OMB Guidelines to Agencies on Governmentwide Debarment and Suspension (Non-procurement), [2 C.F.R. Part 180](#) (including the requirement to include a term or condition in all lower tier covered transactions (contracts and subcontracts described in 2 C.F.R. Part 180, subpart B) that the award is subject to 2 C.F.R. Part 180 and Treasury’s implementing regulation at 31 C.F.R. Part 19.
10. Recipient Integrity and Performance Matters, pursuant to which the award term set forth in [2 C.F.R. Part 200 Appendix XII](#) to Part 200 is hereby incorporated by reference.
11. Governmentwide Requirements for Drug-Free Workplace, [31 C.F.R. Part 20](#).
12. New Restrictions on Lobbying, [31 C.F.R. Part 21](#)
13. This manual as guidelines for OERA are amended from time to time along with all other references made within this manual. All references made in this manual are understood to be as written, and as amended from time to time.

(Remainder of page left blank intentionally)