OREGON HOUSING AND COMMUNITY SERVICES

Hearing Officer's Report to Agency on Rulemaking Hearing

Date (of report):	May 19, 2025
To:	OHCS
From:	Emily Edwards
Subject:	Hearing Officer's Report on Rulemaking Hearing
RAC Date:	10/3/2024, 11/7/2024
Public Hearing Date:	4/22/2025
Hearing Location:	TEAMS
Rule Number:	813-270-0000, 0010, 0020, 0030, 0040, 0050, 0060, 0070, & 0080
Rule Title:	Oregon Rehousing Initiative (ORI)

Rules Advisory Committee

A Rules Advisory Committee (RAC) was implemented for the Oregon Rehousing Initiative (ORI). ORI had been in implementation, with the ORI Program Guidance in place since April 2024. The RAC was engaged to gather feedback on the ORI Program Guidance, and the proposed rule changes to ORI. This engagement took place during virtual office hours sessions. RAC members were also given the opportunity to discuss feedback through direct individual conversations. This engagement was then followed with a survey, sent to all Multi-Agency Coordination (MAC) group leads, Local Planning Group (LPG) leads, and lead contacts for Culturally Responsive Organization (CRO) grantees. OHCS requested that these entities share the survey with any subgrantees and providers implementing ORI, to gain further information and feedback. A copy of this survey is included with this report as Appendix C. A copy of the feedback received via RAC meetings and this survey is included with this report as Appendix D.

The feedback received through this process informed the following changes to the ORI Rules and Program Guidance:

Updates to Administrative Rules:

- 813-270-0010 Definitions: added a definition for "Culturally Responsive Organization" and "Culturally Responsive Service".
- 813-270-0020 Manuals: Updated the effective date for the ORI Program Guidance Manual.
- 813-270-0060 Application for Funding: Updated to correct formatting errors (capitalization of the title and added comma for clarity).

Updates to Program Guidance:

- Section 4: Added language to provide contact email for questions and technical assistance regarding participant eligibility.
- Section 4(A): Removed the definitions for Category 2 Imminent Risk of Homelessness and Category 5 Unstably Housed. Categories 2 and 5 are

not eligible Housing Statuses for the Oregon Rehousing Initiative. This change did not impact ORI eligibility, but rather provided additional clarity on which housing status categories are eligible.
- Section 13(A): Updated $5,000 to "the maximum allowable amount" for the Housing Choice Landlord Guarantee Program.
- Section 15: Added language on when it is allowable to expend funds to move an already housed Oregon Rehousing Initiative household from their original placement into a new unit.
- Section 29: Added language specifying when the performance measures will be measured.
- Section 33: Updated language to specify that grantees are required to submit AGR/RFFs at least quarterly.
- Definitions: Added definition for "Culturally Responsive Organization" and "Culturally Responsive Service".

The following feedback was not incorporated into the ORI Program Guidance or administrative rules at this time. However, this feedback is under continued consideration by OHCS, if additional funds are allocated to continue ORI for the 25-27 biennium.
- ORI eligibility considerations, including the revision of Housing Status definitions to further broaden the program, as well as revisions to language in alignment with HUD definitions.
- Amendment to data and reporting requirements for the program in an effort to increase efficiency, reduce duplicative asks of grantees, and ensure a streamlined process that avoids unnecessary administrative burden on grantees and providers.
- Guidance on advanced requests for funds. The ORI Program Guidance currently has guidance on how to request advanced funds in OPUS. However, further guidance and policies regarding advanced funds are under consideration by OHCS.

The following feedback was considered, but the decision was made to not incorporate this feedback into the ORI Program Guidance or administrative rules. Consideration of this feedback has ended, however OHCS is open to revisiting feedback at any time.
- The removal of landlord incentives as an eligible use of funds. While this is not required by programs, this remains an eligible use of Unit Access funds in support of an overall landlord engagement and unit access strategy. It is not required that regional programs utilize landlord incentives as a strategy.
- The incorporation of additional resources and templates. It has been determined that this is not the intent of the Program Guidance, however OHCS will work towards better resources provision and technical assistance for grantees.
- The addition of guidance on recertification of households when income increases or decreases. While regional programs may incorporate income

requirements, OHCS does not include this requirement for ORI. Therefore, OHCS determined that guidance on recertification would not be incorporated into the Program Guidance.

- Amendment to the certification process for the Housing Choice Landlord Guarantee Program (HCLGP). While ORI rehousing placements are eligible for the HCLGP, this program is operated outside of ORI. Therefore, any amendment to this program's policies/procedures will be made outside of ORI.

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Public Hearing for Rulemaking

The rulemaking hearing on the proposed rules was convened at 10:08 AM (PDT). People were asked to sign the attendance form and indicate if they wished to comment on the proposed rules. They were informed of the procedures for taking comments. They also were told that the hearing was being recorded.

Before receiving comment, I briefly summarized the proposed rules.

List of Attendees:

9 people attended, 5 of which were OHCS staff and 4 external attendees. 2 signed up to present oral comments and 1 submitted written comments prior to the hearing. Attendees included:

- Emily Edwards, OHCS (Hearing Officer)
- Rachel Bennett, OHCS (Divisional Rules Coordinator)
- Danielle Bautista-Sylten, OHCS
- Shelly Hawkins, OHCS
- Jade Maharrey, OHCS
- Kevin Cronin, Housing Oregon
- Alyssa Tuss, Immigrant and Refugee Community Organization
- Roftin Reginald, Immigrant and Refugee Community Organization
- Aundrea Braniff, Lane County

Summary of Oral Comments (Short Version):

The following people testified at the hearing, and their testimony is summarized.

Kevin Cronin, Housing Oregon: Expressed concerns over removing the housing status definitions for Category 2 Imminent Risk of Homelessness and Category 5 Unstably Housed from the Program Guidance, elevating concerns that this would impact household eligibility for the program. Requested amendment to the requirement that grantees must permit access to financial and participant records to federal government due to privacy and data use concerns. Expressed concerns of the maximum allowable amount of rent assistance being 24-months, as households may need permanent rent assistance and longer term supports.

Alyssa Tuss, Immigrant and Refugee Community Organization: Provided support in the removal of housing status definitions for Category 2 Imminent Risk of Homelessness and Category 5 Unstably Housed from the Program Guidance, as this alleviated confusion and lack of clarity on program eligibility. Appreciated the

inclusion of definitions for Culturally Responsive Organizations and Culturally Responsive Services. Requested additional clarity on performance measures, regarding how measures will be collected and how data will be reported.

Summary of Written Comments (Short Version):

No written comments were provided at the hearing. The following written comments were received during the public comment period, and their comments are summarized. Written comments are included with this report as Appendix B.

Matt Serres, Oregon Council on Developmental Disabilities: Requested that "chronic homelessness" be specifically named in the definition of "rapid rehousing activities" to highlight its importance as a priority population and avoid confusion regarding eligibility. Recommended a revision to the definition of "renovation" to include reference to accessibility features, in order to emphasize that as an area to improve performance of a dwelling unit or property. Strongly encouraged revisions to the definitions for "Culturally Responsive Organization" and "Culturally Responsive Service" to include wording specific to people with disabilities.

The hearing was adjourned at 10:30 AM (PDT). The public comment period closed at 5 PM on 4/30/25.

Consideration and Integration of Public Comments:

The public comments received were considered by OHCS:

- The comment requesting amendment to the requirement that grantees must permit access to financial and participant records to federal government due to privacy and data use concerns is continuing to be discussed and considered by OHCS. While amendment to this language is not being incorporated into the ORI Program Guidance at the time of this rule filing, OHCS is discussing the intent and requirement of this standard language to ensure transparency and accuracy on data sharing procedures.
- The comment requesting further clarification of reporting and performance measure requirements is being considered if funds are allocated to continue ORI for the 25-27 biennium. OHCS is in the process of providing written guidance on reporting procedures for Culturally Responsive Organization partners. While this will not be incorporated in the Program Guidance, it will be made available to grantees.
- The comments regarding specifically naming "chronic homelessness" within the description of "rapid rehousing activities" will be considered if funds are allocated to continue ORI for the 25-27 biennium. This will remain part of the discussion regarding program eligibility and prioritization.
- The comments regarding modifications to the definitions of "renovation", "Culturally Responsive Organization", and "Culturally Responsive Service" will be considered if funds are allocated to continue ORI for the 25-27 biennium. These are definitions shared across the agency.

While reviewed, the following comments are not being further considered:

- The comment to retain the definitions of Category 2 Imminent Risk of Homelessness and Category 5 Unstably Housed in the Program Guidance is not being considered. As these two Housing Statuses have not been eligible for the program, removal of their definitions is intended to provide clarity on program eligibility and eliminate misperception.
- The comment on increasing the maximum allowable amount of rent assistance from 24 months is not being considered as this requirement is legislatively directed for the 23-25 allocation of ORI via the SB 5701 Budget Summary. If funds are allocated to continue ORI for the 25-27 biennium and this legislative direction differs, then considerations to the maximum allowable amount of rent assistance per household will be discussed.

Appendices:

A – Transcript of public hearing

B – Submitted written comments

C – RAC feedback survey

D – RAC feedback results

Transcript

April 22, 2025, 5:08PM

☐ **EDWARDS Emily * HCS** started transcription

EDWARDS Emily * HCS 0:04

OK.

So this hearing is now in session and is being digitally recorded to maintain a permanent record.

My name is Emily Edwards, and I am the hearing officer.

Today is April 22nd, 2025, and the time is 10:08 Pacific Time.

The purpose of this hearing is to provide an opportunity for public comment on the rules proposed for adoption and amendment of OAR 813-270-0000 through 0080 for the Oregon Rehousing Initiative program by OHCS, regarding Senate Bill 5701 from 2024.

The rules change the Oregon Rehousing Initiative program include:

In 813-270-0010, Definitions: added a definition for culturally responsive organization and culturally responsive service.

In 813-270-0020, Manuals: updated the effective date for the ORI Program Guidance Manual. We will discuss the changes that are reflected in this guidance in just a moment.

And in 813-270-0060, The application for funding: we updated to correct some formatting error, errors, including capitalization of the title and an added comma for clarity.

In the ORI program guidance updates, those are the following:

In section four of the program guidance, we added language to provide a contact e-mail for questions and technical assistance regarding participant eligibility.

In Section 4A, we remove the definitions for category two, imminent risk of homelessness and category 4 unstably housed. Categories two and five are not an eligible housing status for the Oregon Rehousing initiative, so these were, these definitions were removed for clarity.

Section 13 a, we updated the $5,000 to "the maximum allowable amount" for the Housing Choice Landlord Guarantee Program.

In Section 15: added language on when it is allowable to expend funds to move an already housed Oregon Rehousing Initiative household from their original placement into a new unit.

And let's see.

Section 29: added language specifying when the performance measures will be measured.

Section 33: updated language to specify that grantees are required to submit AGR or RFFs at least quarterly, and in the definition section, we added the definition for culturally responsive organization and culturally responsive service.

OHCS invites comments about these proposed rules and whether other options should be considered for achieving the rules' goals while reducing potential negative impacts that may derive from the rules as currently proposed.

In addition to presenting oral comments at this hearing, written comments may be submitted until 5:00 PM Pacific Time on 4/30, which is the close of the public comment period.

Please submit public comments to Emily Edwards myself.

Comments received after 5:00 PM on 4/30 will not be reviewed or considered by OHCS unless the agency decides to extend the public comment period for everyone.

OHCS will not respond to questions during this hearing after the close of the public comment period. I will prepare a report capturing all comments and responses.

We will begin taking comments now, so please feel free to raise your hand and unmute, or you may add your comments to the chat if that is your preference.

Yes.

And when you are called upon, if you could please record your name for the record as well.

Kevin Cronin, he/him, Housing Oregon 4:05

I was gonna let the folks from ERCO speak first.

If that if you guys wanna go first.

Alyssa Tuss 4:17

You can go ahead first.

I don't have questions yet, but I'm sure it'll come up.

Kevin Cronin, he/him, Housing Oregon 4:23

OK.

So I just wanted to share my really deep concerns over removing the eligibility criteria where someone is at imminent risk of losing their housing.

Particularly around like option, I think #2 and #5 removing those is not, it is not good.

We would prefer not to see that being removed.

My name is Kevin, by the way, I use he/him, with Housing Oregon, our policy and advocacy director, representing affordable housing developers and operators.

I would say, my other concern is when it comes to the data sharing requirements.

Like, you have it listed in your program manual that you have to turn everything over to the federal government if they ask.

That includes all the financial records as well as like all the participant records.

And and so I just have some concerns about that.

Maybe we should have some, like that, maybe they should be serving a request and then OHCS can review that request before they transfer all of the data.

I just would like to see a speed bump in there.

I think that would be just, you know, best practice in this current climate?

And then I just wanted to express a little bit of frustration with, with the program. So as we are like kinda moving away from maybe helping people that are at imminent risk of losing their house, we're set up with a system where we are helping people for 24 months.

We're getting them set up, but the way that we are selecting people is we're also part of this is like, you know, people that are getting rapid rehousing.

You know, the wrap around services are supposed to help them apply for benefits and things like that, and if you get rapid rehousing and you apply for, say, SSDI, and you get it, great. But at the end of your 24 months, you're gonna be severely rent burdened, and you're probably going to get evicted.

And so I would, like, this program is great for people where you can help them get, like, employment and set up so that they can not, maybe not be rent burdened at the end of the, the 24 months, but in some ways, you, like, the way that you're changing your program manual, the, like, the people that you're gonna be more serving or the people that maybe won't have long term income opportunity for expansion and that you're going to be giving them temporary rent assistance.

And so maybe, maybe the, the focus needs to be on how can we get them into a permanent rent assistance situation because with our, maybe our market landlord

partners, like, this program is getting a bad reputation, and I don't think that is, like, what we want.

We want our land, like, our landlord partners, to trust us and so we're just setting people up for failure, and so I, I feel like we just need to think about it really carefully about, like, how, how best we can, we can, we can do it and set it up to serve people.

And, and that that's just kind of a general frustration about the program.

I you know, I, I, I really believe in this work and I really want to help serving these people, but we shouldn't be setting them up for, like, a cliff at 24 months or we should be using this program to serve people that will can make that transition, right?

And maybe look at serving those other people in a different way.

So that's just generally my feedback.

This has been based on a lot of conversations I kind of wanted to hear what IRCO wanted to say because I didn't necessarily want to, like, go against what they want to say.

So I, I, that's why I was curious.

But that's just generally the feedback that I've gotten and I did wanna just raise concerns about those two specific things in the program manual: that one is sort of a holdover from last time, and then this one is the removal of things that I consider important, so that's my comments.

Thank you so much.

EDWARDS Emily * HCS 9:35

Thank you.

Really appreciate the comments.

Does anyone else have any?

Oh, Alyssa, if you could please state your name for the record and who you represent.

Alyssa Tuss 9:49

Sure. Thanks. My name is Alyssa Tess.

I used to her pronouns and I represent IRCO.

I am the special programs coordinator that is coordinating the ORI, ORI rehousing program at IRCO, and I'm joined today by Roxan Reginald, who is our housing specialist, who's also working on a program.

And I actually wanted to voice my support for removing category two and category five from the program guidance.

As we were working through it and setting up the program at IRCO, that was a big pain point because it was mentioned in the program guidance, but it wasn't clear that they were not eligible for the funds.

So that did create a bit of confusion on our end.

So I support the removing of those categories' definitions, because if they're not eligible, I don't see the purpose of having them included in the definitions.

And then, I do appreciate adding the definition for culturally responsive organization and service.

I would like to see if there was any differences for providers that are culturally responsive organization or provide culture responsive services.

Any different, like flexibility or, umm, any, you know, difference in how those the those organizations provide the service or provide ORI funds. But I do think that having the definitions in there is helpful.

And I haven't gotten a chance to look at section 29 yet, but I am wondering what the performance measures, how often those will be?

Because it was not clear in that first guidance. So, I think having them stated in the new one will be helpful as well.

EH **EDWARDS Emily * HCS** 12:02

Great. Thank you. Appreciate your comments.

Anyone else have any comments that they would like to make?

Or any questions for the record?

AT **Alyssa Tuss** 12:40

I have another question.

This is Alyssa with IRCO again.

I am not looking at the performance measures change and I'm wondering how those are going to be reported and that data being collected, whether that is through HMIS or through a separate reporting structure.

That would be good to have clarification.

EH **EDWARDS Emily * HCS** 13:08

Thank you.

I appreciate that additional, additional clarification point.

I see no additional comments at this time.

I'm going to stop the recording, but if anyone does wish to provide any additional comments, we can restart the recording at any time.

☐ **EDWARDS Emily * HCS** stopped transcription

Transcript

April 22, 2025, 5:30PM

EH   **EDWARDS Emily * HCS**   0:05

OK.

Thank you for coming.

It is now 10:30 P— or, AM Pacific Time, and the hearing is adjourned.

I will stop recording at this time. Thank you.

◉ **EDWARDS Emily * HCS** stopped transcription

Oregon Council on Developmental Disabilities

BETTER TOGETHER

April 16, 2025

Matt Serres, Public Policy Director
Oregon Council on Developmental Disabilities
2475 SE Ladd Ave #231
Portland, OR 97214

RE: Written Comments on Oregon Rehousing Initiative Program Guidance

To Rachel Bennett and the Oregon Housing and Community Services Department:

The Oregon Council on Developmental Disabilities (OCDD) works to create change so that people with intellectual and developmental disabilities (IDD) can live full lives as valued members of their communities. The purpose of this letter is to provide written comments in response to the "Notice of Proposed Rulemaking" with respect to implementation of the Oregon Rehousing Initiative (ORI) rules and guidance.

Rapid rehousing can and should be used in instances of "chronic homelessness." While it is indirectly captured in the rulemaking under the categories drawn from 42 USC 11302 that the OAR appears to rely upon, including "chronic homelessness" in the definition of "rapid rehousing activities" would help to highlight its importance and avoid confusion. We recommend modifying the definition as follows with changes in **bold**:

> " 'Rapid Rehousing Activities' means those services performed to enable households to obtain permanent housing when they are currently homeless. Rapid rehousing is used when a household's housing status is literally homeless (category 1), **which includes chronic homelessness**, homeless under other federal **statutes** (category 3), or when a household is fleeing or attempting to flee a domestic violence situation (category 4)."

Technically, it is a subset of Category 1 "literal homelessness," because, in order to be "chronically homeless" under HUD regulations, you first must meet the federal statutory definition of being literally homeless under Category 1. Chronic homelessness is not only "literal homelessness" or homelessness as defined in "federal statutes", it is a recognized homelessness status of primary concern under HUD's "Continuum of Care" regulation that underscores the strong intersection between homelessness and disability. To be "chronically homeless," a person must be "homeless," as defined by 42 USC 11302 Category 1, have a qualifying disability, and be homeless for at least 12 months, or on at least 4 occasions in 3 years totaling 12 months. The benefit of including "chronic homelessness" under the "Rapid Rehousing Activities" definition is that it may encourage grantees to include it as a "priority population," as it is a population with the greatest need that should be served first.

Also, the removal of "imminent risk of homelessness" (Category 2) and "unstably housed" (Category 5) may mislead grantees as it relates to "chronic homelessness," because a cursory understanding of that regulatory terminology makes it sound like it may capture those who are merely "at risk" or "unstable" given its duration requirement of "at least 4 occasions in 3 years totaling 12 months." However, that element is only one element, since the definition for "chronic homelessness" also incorporates the element of "literal homelessness." In other words, not only must a person have been homeless on at least 4 occasions totally 12 months, but they also must be currently homeless. Given the potential for misunderstandings pertaining to the meaning of "chronic homelessness" as a "risk of homelessness" or "unstably housed" when it is in fact "literal homelessness," we encourage the inclusion of the terminology in the definition for "Rapid Rehousing Activities."

We also recommend that the definition of "renovation" include reference to accessibility features, in order to emphasize that as an area to improve performance of a dwelling unit or property. The following changes would improve the meaning of "renovation" to reflect these concerns:

*" 'Renovation' means the process carried out to upgrade an existing structure and to improve performance by either altering the scope of **the** structure, providing additional facilities, **adding accessibility features**, or **otherwise** improving existing facilities. Improving the property."*

The lack of accessible housing is a driver of chronic homelessness as well as the need for rapid rehousing services, because many individuals with physical disabilities struggle to find dwelling units that meet their accessibility-related needs. The state building code requirements for accessible units in new construction are woefully inadequate in terms of keeping up with the demand for accessible dwelling units causing the state to fall further behind. That is why emphasizing accessibility as part of the renovation process is critical as requirements and incentives for new construction, *as well as* renovation to existing structures are all necessary to meet the housing needs of chronically homeless individuals.

Finally, we would strongly encourage that the definitions of "culturally responsive organization' and "culturally responsive service" include wording specific to people with disabilities. The following are two suggestions for revising those definitions:

*"Culturally Responsive Organization: An entity that provides services to a cultural community, **such as persons with disabilities**, and the entity has the following characteristics: Comprehensively addresses power relationships throughout the organization by methods that include addressing conflicts and dynamics of inclusion and exclusion **and ableism**; Has relationships with and is responsive to communities that the organization serves, including communities of color **and persons with disabilities**; Hires, promotes, trains and supports staff, **including reasonable accommodations for persons with disabilities,** who are culturally and linguistically diverse in ways that reflect the communities that the organization serves, including community of color **and persons with disabilities**; Provides culturally responsive **and accessible** services; and has*

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adopted governance structures, policies and cultural norms to hold its leadership and staff accountable and to continue improvements."

*"Culturally Responsive Services: A service that: Is 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 **and persons with disabilities**;*

*Has the capacity to respond to the issues of diverse communities; and assures competent language access, **alternative communication methods or other forms of accessibility for persons with disabilities**, 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."*

Community organizations and government agencies often overlook "disability" as a "culture." Disability communities have shared histories, languages (such as ASL), and social experiences that shape their collective identity. Recognizing this is essential to the formation of culturally responsive organizations and services. Without explicit inclusion, efforts toward cultural responsiveness risk reinforcing ableism and leaving this priority population behind.

Sincerely,

Matt Serres
matt.serres@gmail.com
503-931-9176

4

Oregon Rehousing Initiative (ORI): Request for Feedback

OHCS is requesting feedback regarding the statewide rehousing program, the Oregon Rehousing Initiative. Specifically, we are assessing whether there are recommended modifications to policy decisions or other items within the [Program Guidance](#) now that regions have begun implementation of ORI programs on the local level. Modifications to the ORI Program Guidance will be incorporated into administrative rule.

Please respond to any or all of the following questions; you are not required to respond to every question in order to provide feedback, nor is it necessary for you to provide your identifying information if you prefer not to.

This form may be shared with any subrecipient or provider who is implementing ORI programming. **Please submit feedback by 12 PM (PST) noon, Monday, November 4th.** If you have any questions, or if you would like to provide more feedback than this form will allow, please email EO2302.questions@HCS.oregon.gov.

Your feedback is very appreciated. Thank you!

Name and/or Title

Organization or Region

1. The Oregon Rehousing Initiative Program Guidance was intended to provide general guidelines for the program, while allowing flexibility across programs where possible. Are there areas that you feel would benefit from more detailed guidance? Where do you need more clarity regarding eligibility or policy decisions for ORI?

Link to the [ORI Program Guidance](#)

2. What challenges have you faced as a result of key policy decisions or the general structure of the Oregon Rehousing Initiative?

3. Has implementation of the Oregon Rehousing Initiative at the regional level resulted in any unintended consequences? If so, what are they? Do you have recommendations on how the program can be modified to address those concerns?

4. Please describe how the policies within the Oregon Rehousing Initiative have impacted equity, including racial equity, diversity, and inclusion in your programming and community.

5. Please describe any regional impacts to administration, compliance, data, and reporting as a result of implementation of the Oregon Rehousing Initiative.

6. Please identify whether the rules will have a fiscal impact, either negative or positive, on state agencies, local government, or the public, and if so, the extent of the impact.

7. Has the implementation of the Oregon Rehousing Initiative impacted small businesses in your community? If so, please elaborate on the number of businesses, types of businesses, and how OHCS can involve small businesses in the implementation of this program.

8. Is there anything else that you would like to share with OHCS that wasn't included above?

☐ Send me a copy of my responses

Submit

Q1	The Oregon Rehousing Initiative Program Guidance was intended to provide general guidelines for the program, while allowing flexibility across programs where possible. Are there areas that you feel would benefit from more detailed guidance? Where do you need more clarity regarding eligibility or policy decisions for ORI?
Q2	What challenges have you faced as a result of key policy decisions or the general structure of the Oregon Rehousing Initiative?
Q3	Has implementation of the Oregon Rehousing Initiative at the regional level resulted in any unintended consequences? If so, what are they? Do you have recommendations on how the program can be modified to address those concerns?
Q4	Please describe how the policies within the Oregon Rehousing Initiative have impacted equity, including racial equity, diversity, and inclusion in your programming and community.
Q5	Please describe any regional impacts to administration, compliance, data, and reporting as a result of implementation of the Oregon Rehousing Initiative.
Q6	Please identify whether the rules will have a fiscal impact, either negative or positive, on state agencies, local government, or the public, and if so, the extent of the impact.
Q7	Has the implementation of the Oregon Rehousing Initiative impacted small businesses in your community? If so, please elaborate on the number of businesses, types of businesses, and how OHCS can involve small businesses in the implementation of this program.
Q8	Is there anything else that you would like to share with OHCS that wasn't included above?

Q1	**The Oregon Rehousing Initiative Program Guidance was intended to provide general guidelines for the program, while allowing flexibility across programs where possible. Are there areas that you feel would benefit from more detailed guidance? Where do you need more clarity regarding eligibility or policy decisions for ORI?**

Appreciate the flexibility offered to the local planning groups. Category 3 stipulations is major area of concern; appreciate the ability to serve those who meet other federal homeless definitions, particularly the McKinney-Vento definition for youth and families with children, but the added requirements regarding length of time since holding a lease and number of times they have had to move in the past 60 days are burdensome to document and add obstacles to serving vulnerable families, particularly those who are non-English speakers. It would be better to simply allow all youth and families who meet the McKinney-Vento definition to be served with ORI, without the other stipulations. Considering Oregon's homeless crisis, OHCS should be making decisions that are thoughtful of local conditions instead of merely copying HUD regulations, which have always been designed to exclude.

Having less detailed guidance would be more beneficial. We are utilizing ORI for our Diversion program, having flexibility that allows us to assist households with obtaining permanent housing in creative ways is key. We hope that OHCS will continue to allow for ORI funds to be used in non-traditional ways to address housing barriers.

The guidance is so helpful! Clearly, flexibility is a priority for the this program, and grantees have the ability to use funds to best serve a client's unique needs. It would have been helpful to include a checklist or guideline on setting up sub-awards, as our organization has not done this before. OHCS staff was very helpful in answering questions and providing resources for technical assistance.

Some detailed guidance on whether we can enroll clients beyond June 30, 2025, if we still have funds that could be expended until June 2027.

The guidance for ORI has been very helpful - provides a much better understanding of the program than the HB5019 launch.

Additional guidance that includes specific mock household housing statuses and how they are translated into the specific eligibility criteria. For example:
Household A: Exiting residential treatment facility where they resided for 6 months. Prior to entering RTF, household was in emergency shelter. ORI program guidance modifies HUD's definition of literally homeless by changing the phrase "transitional housing" to "transitional shelter." Benton County is grateful that OHCS has diversified housing options for ORI participants by including Oxford and alcohol- and drug-free communities and RV housing options as successful rehousing placements; however, it is unclear if a household is eligible for ORI services that is currently living in one of these living arrangements upon engagement with an ORI funding program. For example, a person living in an RV would under some circumstances qualify as homelessness (Category 1, place not meant for human habitation) if the condition and placement of the RV does not meet the habitability requirements listed in ORI. In addition, a person who is receiving transitional housing for substance use recovery in an Oxford or other Alcohol- and Drug-Free Community may be seeking to exit this environment or be required to exit and not have necessary resources to locate and fund housing. These living arrangements can be seen as transitional living arrangements for some households as their recovery goals change. Clarification is needed on whether households exiting an Oxford or other Alcohol and Drug Free Community qualify to receive ORI services. Guidance on these circumstances should be included in the definition sections of homelessness.

We agree the manual is very broad in some respects, but we would like a little more clarification on recertifications and if the way we are dealing with increase and decrease in income is correct.

Align participant eligibility with HUD's new Category 4 definition, and edicate CoCs on the written standards required to use the new definition prior to the updated rule. Regarding RV housing options, can ORI funds be used only to pay space rental and hook-up fees? When will we know if the HCLGP reimbursement cap ($5k) will be increased? What is the timeframe for performance measure #3 (increase housing stability by assisting 80% of all participants who exit the program to maintain their permanent housing or relocate to other PH destination)? Provide more clarity around what is meant by "frequently and regularly" submit AGRs/RFFs.

Q2	What challenges have you faced as a result of key policy decisions or the general structure of the Oregon Rehousing Initiative?

The structure of the Manual for ORI as well as for HB 5019 has proven to be very confusing to providers, particularly those who are not used to interpreting OHCS manuals. It is not helpful to include Housing / Homeless Categories in a program guide that are NOT eligible for the funds in question. In the case of ORI, if only Categories 1, 3, 4, and 6 are eligible, Categories 2 and 5 should not be included in the Manual. It is far too easy for someone to overlook the small box that says which Categories are eligible and simply review all the Categories themselves, assuming they are all included. Please consider editing the final manual to remove Categories that are not eligible for ORI services. Otherwise, I fear you will run into many compliance issues when you monitor the less experienced grantees.

We have appreicated OHCS loosening some of the ORI criteria since its inception to allow us to use the funds for our incredibly successful Diversion program. We had great concern initially that with requirements like a participant having to be on a lease, we would not be able to use the funds in such a way. We hope OHCS continues to prioritize flexibility and loose criteria in circumstances where programs have been proven to be incredibly successful in getting participants rehoused.

The flexibility of ORI funds makes it well suited to address gaps in existing programs; however, this process takes a large amount of local staff time to evaluate compatibility between ORI and other local, state, and federal rehousing programs. Because of the flexibility of ORI funds and the way in which we have developed a program that can rapidly respond to requests for services, we are becoming the primary recipient of referrals from our network of providers for housing services. This very new program is not prepared to, nor should it divert existing or future caseloads from existing housing and support programs administered by our CAA. We need state and regional support to ensure existing housing programs funded through other sources are receiving necessary operational support to effectively meet their program goals and objectives and connect people to housing so that our ORI program does not become overwhelmed. We have received feedback from referring agencies that eviction prevention funds are not being deployed quickly enough to avoid eviction, or that households are either not eligible or have already received eviction prevention services and therefore are not able to access these services. Some households who have accessed EP funds did not receive the necessary case management supports for the funds to restabilize and preserve their housing. Starting discussions on how our local and regional RRH programs can better work with EP programs. In reviewing ORE-DAP program guidance, it appears that there is an obligation that agencies administering ORE-DAP funds establish strong partnerships with local service providers to expedite response times. Only recently have we become aware of ORE-DAP, and many of its partnering service providers were also unaware of the program. We have seen multiple times that people are forced to become homeless in order for ORI programs to serve them. Shelter resources are being used to keep these households from being unsheltered; these resources are more costly than rental and EP assistance. Eviction records make it more challenging for our ORI program to rapidly rehouse people, due to being screened out of the limited availability of housing units. Increased housing barriers adds to the staffing. OHCS should take a lead role in supporting better connection between ORI and EP and housing stabilization services administered by CAAs, maybe by developing unified eligibility criteria and support in development of a universal intake form that consolidates information about various state and federal housing programs. ORI's innovative approach that reduces the complexity of program eligibility screening requirements could inform programs such as ORE-DAP to reduce response times.

Our biggest challenge is that folks that are currently on HB 5019 cannot transition to ORI subsidies.

Without ongoing, sustainable funds to support infrastructure, CoCs can't develop system capacity to support landlords in new ways. Can funds be used for LE stipends? Requiring rehousing providers to register an ORI tenancy under the HCLGP by completing the Rehousing Certification online is problematic; discussions were held about ways to improve the process.

Using coordinated entry to fill slots. Category III doesn't fit well with CE requirements in ORI (like capturing folks who are couch surfing). Uniform screening tool across CoC to connect people to the right services and also being able to implement the program.

Q3	**Has implementation of the Oregon Rehousing Initiative at the regional level resulted in any unintended consequences? If so, what are they? Do you have recommendations on how the program can be modified to address those concerns?**

While the concept of LPGs is good, in reality, these groups are generally not legal entities, so allocating grants through these types of "committees" is problematic, as they have no legal standing. Reimbursement-only funding model continues to be a big challenge for smaller organizations to manage since they do not have the capacity to float thousands of dollars in assistance and staffing while waiting for OHCS to reimburse them.

The program should have as minimal of criteria as possible.

The contract start date shows is before July 2024, but we received the full execution in Oct 2024, so can that lost period be retroactively reimbursed?

Utilizing the HB 4123 Pilot structure as the lead for our ORI and HB 5019 implementation has enabled us to begin implementation of our HB 4123 initiatives with clear and objective goals and the resources to accomplish these goals. A coordinated homeless response at the county level enables a more targeted response to our specific housing and homelessness needs. We have identified significant gaps and underutilization of existing housing and homelessness resources. Programs such as HOME TBA have gone largely underutilized due to a lack of staffing support at CAAs for case management and housing navigation. We are strategizing with CSC (the regional HOME TBA administrator) to determine how case management and housing navigation supports funded by ORI can help support CSC in deploying these existing rental assistance programs into our community and stretch ORI funds further. ORI implementation was timed well with the recent completion of several affordable housing developments in Corvallis. In partnership with the City of Corvallis, we have established strong relationships with the owners to access these units for ORI participants; however, the screening criteria for these units presents a significant barrier for rehousing ORI participants. In addition, we have been working to establish MOUs for set aside units at these locations to serve ORI participants. These sites were receptive initially, but we are now finding it challenging to formalize MOUs with these developments due to a lack of awareness about ORI or the experience that these large out-of-state developers have had with other EO responses in the metro areas. The owners and managers of these programs were receiving information from OHCS (LIHTC and LIFT) that initially suggested that this type of partnership violated the LIHTC and LIFT requirements, significantly delaying discussions and diverting staff resources. OHCS should take a lead role in improving connection between ORI or similar rehousing programs and projects supported by LIHTC and LIFT. Improved access to affordable units will extend the service capacity of ORI program funds.

Tipping the scales for one program (rent assistance) is a detriment to the overall system and ultimately results in driving up the cost of rent. Landlord bonuses (as an LE incentive) contribute to increases in rental costs down the line and pit one program/funding source against another.

Q4	**Please describe how the policies within the Oregon Rehousing Initiative have impacted equity, including racial equity, diversity, and inclusion in your programming and community.**

Using the non-traditional Diversion model, we have seen more BIPOC households served via the project than we have in our PSH and RRH program models.This is consistent with national data that indications a Diversion approach creates fewer barriers to access for BIPOC individuals than more traditional housing programs.

We serve diverse populations and communities from different ethnic and racial backgrounds, and we believe that ORI contract is the right choice as the contract is not specific to just one client category/ethnicity.

It has been a positive - we continue to build our systems/processes through an equity lens.

The template and data provided by OHCS to guide the development of Benton County's community plan supported meaningful communitywide engagement that identified priority populations overrepresented in Benton County's unsheltered communities and provided example strategies to reduce barriers for these populations in accessing housing. The flexible funds provide by ORI allow for local innovation to develop and deploy strategies to reduce barriers for our priority populations, including: (1) Funds for intensive case management and housing navigation; (2) barrier busting funds that can address a wide variety of expenses to support rehousing placements; (3) landlord engagement, education, and incentives to improve relationships between housing service providers and landlords; and (4) peer supports and street outreach that meet people where they are at. While these resources have been able to successfully rehouse over 20 households (as of 11/1/2024), the most challenging barriers to housing are not readily resolved by funds. Screening criteria for rental units (even at affordable housing developments) excludes people with poor credit history and criminal backgrounds, which are common barriers for overrepresented subpopulations. Screening criteria perpetuates racial and cultural inequities in the access of housing. We respect the concerns of landlords and the need to protect investments, but more support is needed from a state and federal level for our local homeless response programs to have a meaningful impact on housing inclusivity and accessibility. Short term and long term state support could come in the form of: template appeal language; template MOUs for preference groups; OHCS establishing priority groups directly with local and regional housing authorities to improve access of Section 8 for ORI participants; template screening criteria that provides guidance to landlords; OHCS-led coordination with Legal Aid services; and local- or state-established tax incentives and/or grants that are more accessible to local and culturally represented housing developers to provide affordable units for ORI participants.

We have seen a positive impact overall. The increase in program funding has helped us serve those who would typically not reach out for help. We have been able to walk the talk and show follow through to our marginalized communities.

Would like to have more targeted and useful equity resources. Acknowledged that disproportionate impact to BIPOC is an issue statewide, but the resources are focused in Portland. Sustainable, system-level funding is required to build a more equitable Coordinated Entry System. This is integral to equitable engagement, service delivery, and outcomes.

Q5	Please describe any regional impacts to administration, compliance, data, and reporting as a result of implementation of the Oregon Rehousing Initiative.

OHCS funding is not easy to administer because of the intense administrative burden, compliance regulations, and data requirements. ORI is not any easier than any of the other funds OHCS offers. HMIS requirements alone are far beyond what the average non-profit homeless provider can manage, even with support from a CAA like ours.

ORI funds have gone to data support for a service organization in getting set up with HMIS, which not only helps them access rehousing ORI funding but also makes them better positioned for future OHCS funds.

We are building our regional capacity to track our data in the HMIS system. It is a struggle to get all of the key providers/agencies on the same page with this. Especially when there are other systems being mandated at the same time - for example, the IHN-CCO HRSN billing and referrals through the Unite Us system. In a rural county that has a smaller population base, our workforce has constant churn, so getting the robust HMIS system up and running and then having quality data and consistency is a challenge.

Specifically, data entry and financial administration is unique in each community and organization. Utilization and methods of HMIS are inconsistent and create redundancies and burden on staff capacity. We request improved leadership from OHCS to guide statewide standardization in HMIS usage and advocate for HMIS system upgrades to improve accessibility for the variety of HMIS users that have varying technical and operational capacity.

There has been an increase across the board in all of these areas. We have had to increase our capacity to meet the program demands. We are concerned about long-term funding for these types of programs. We do not want to hire and train staff and end up not being able to sustain the position. That is not good for team morale, community perspective, and overall health of our organization.

How will data be gathered and validated to track repeat housing placements? Where can I find the required data reporting process for ORI? To my knowledge, we have not received any reports for confirmation of monthly disaggregated data; when will this process begin? I also do not recall receiving any instructions on how to format and share SPM reports.

Q6	Please identify whether the rules will have a fiscal impact, either negative or positive, on state agencies, local government, or the public, and if so, the extent of the impact.
	All OHCS regulations have a fiscal impact on the agencies that administer the funding. They add tremendously to the overhead of an agency, which is not exactly a positive, and the eligibility regulations impact the public who are seeking services. This "red tape" slows down the process of getting people rehoused, resulting in frustration on the part of the public and local elected officials, who do not see the rates of visible homelessness decreasing.
	This funding absolutely has a positive impact on the public. The additions of DV survivors and McKinney Vento enrolled students has allowed the region to share funds more widely than the previous rules.
	Too soon to determine community fiscal impacts of the ORI implementation, but as the fiscal agent of these funds, we are receiving a positive fiscal impact.
	Positive fiscal for our community partners. We have been able to provide reliable income to our local landlords. This has increased the positive relationships with them. These funds have also allowed us to increase staffing ,which is great for our local economy.

Q7	Has the implementation of the Oregon Rehousing Initiative impacted small businesses in your community? If so, please elaborate on the number of businesses, types of businesses, and how OHCS can involve small businesses in the implementation of this program.
	Not that I am aware of.
	It has impacted one-off landlords by helping tenants get into units and ensure that rents and deposits are done properly. Having the landlord guarantee program has also provided peace of mind for them once a tenant vacates.
	We are client focused program. Use of this contract will support not only our program progress but also the landlords and businesses we partner with. We will provide promissory notes to landlords and buy furniture for clients from local stores, which will also support them to grow locally and hire more individuals, perhaps including the clients we serve (because our goals after housing clients) is to help them find jobs.
	No
	We are working on understanding what types of incentives would support recruitment of landlords, which could have future impacts on property management business. In addition, we are exploring ways to streamline access to furniture, storage, and moving services, all of which could have impacts on local business providing these services.
	We do not have any data on this type of impact; however, we know that we have been able to help our smaller landlords sustain their much-needed monthly rents in order to remain as landlords. We have also seen an increase in household income for our clients that have received assistance with these funds.

Q8	Is there anything else that you would like to share with OHCS that wasn't included above?

Would just continue to emphasize the importance of allowing flexibility and low barrier access to ORI funds. They have been critical to us operating our Diversion program, which is a key part of our homelessness services system and has proven outcomes.

It is really nice that this funding can be used on more than just direct housing needs. We have been able to help a mother with her car brakes with this funding, which allowed her to keep reliable transportation from her new apartment and has helped her keep her new job (which then helps with sustainability).

We would like to receive this kind of survey again sometime next year, perhaps before June 2025.

We have seen positive impacts internally and throughout the community as a result of the implementation of ORI. The resources offered through ORI have strengthened partnerships between Benton County and the City of Corvallis to work towards tangible system changes to respond to homelessness. The programmatical capacity from ORI is well suited to be coordinated with the capital resources of the city and its relationship with affordable housing developments. The state should provide statewide and regional leadership to provide financial and program technical assistance for CAAs and other housing assistance providers. Expand financial tools available to these agencies to expedite EP and rental assistance payments, and simplify program eligibility screening processes. These tools will position housing assistance providers as a competitive customer of the private housing market and improve landlord and property manager relations. We want to reiterate the importance of improved coordination at the state level across departments and divisions that all impact the local implementation of rehousing programs. The burden of system navigation and change cannot be solely on the local community that is often put in a position of rapid/crisis response. We are grateful that OHCS provides this opportunity for feedback, and we are confident that this feedback will be used to inform policy and system change beyond the scope of ORI.

Having some flexibility to increase/decrease assistance for those on the program when the household situations change would be beneficial.

In contrast to HUD's definition of homelessness, which stipulates that time spent in an institution must not exceed 90 days in order to not constitute a break in homelessness, ORI does not set a maximum time limit for time spent in an institutional care facility that would trigger program ineligibility. Because ORI funds can be used through the 2025-27 biennium, households should not have to access HUD funding, so this works. Inlcuding ORI in the HCLGP is helpful.