

OREGON HOUSING AND COMMUNITY SERVICES

Hearing Officer's Report to Agency on Rulemaking Hearing

Date (of report):	July 28, 2025
To:	OHCS
From:	Rachel Bennett
Subject:	Hearing Officer's Report on Rulemaking Hearings
RAC Date:	May 19, 2025
Public Hearing Date:	June 16, 2025
Hearing Location:	TEAMS
Rule Number:	813-261-0000 through 813-261-0050
Rule Title:	Oregon Eviction Diversion and Prevention (ORE-DAP) Program

Rules Advisory Committee

A Rules Advisory Committee was convened on May 19, 2025, from 2:30 to 3:40 p.m. PT. Of the six participants who confirmed availability for the RAC meeting, three attended and provided feedback on the draft impact statements drafted by OHCS:

- Marisa Ball, Marion County Housing Authority
- Breezy Poynor, Mid-Willamette Valley Community Action Agency
- Stacie Sabourin, Mid-Columbia Community Action Council

All RAC participants were provided with copies of the proposed impact statements, draft rules, and program guidance prior to the May 19 meeting. All RAC materials are contained within Appendix B attached to this report.

Feedback received from the RAC is summarized as follows, along with OHCS's explanations as to whether the rules or program guidance were updated in response:

- The estimated 50-100 small businesses impacted by the ORE-DAP rules seems low, especially in light of the fact that many regions' landlords and property managers operate as small businesses. A better estimate might be 500 impacted small businesses.
 - *OHCS has revised its estimate of impacted small businesses from 50-100 to 300. This is based on its understanding of the type of small businesses impacted by these rules—landlords and property managers—and not as a result of changes to the program or implementation.*
- Further definition or examples of "case management" would be beneficial for understanding what the expectation is of the services provided to a household. "Participant services" might be an alternative phrase, as "case management" can vary widely across programs and regions.
 - *OHCS is currently reviewing its definition of "case management" as described in the program guidance and is considering providing*

further clarification of what it encompasses. Additional revisions to program guidance are expected within the next six months and may result in an amendment to the currently drafted rules.

- More explanation is needed of what “requiring culturally responsive service delivery” means.
 - *Based on feedback received from ORE-DAP service providers regarding current implementation of “culturally responsive service delivery,” OHCS is considering providing further clarification in program guidance as to what that entails. Additional revisions to program guidance are expected within the next six months and may result in an amendment to the currently drafted rules.*

Public Hearing for Rulemaking

The rulemaking hearing on the proposed rules was convened at 9:30 a.m. PT. People were asked to indicate if they wished to comment on the proposed rules. They were informed of the procedures for taking comments both during the public hearing and before the June 30, 2025, deadline for submitting comments in writing. They also were told that the hearing was being recorded.

Before receiving comment, I briefly summarized the proposed rules and the updates to current program guidance (provided by Shauna Williams, Program Analyst 2 on the OHCS HSD Housing Retention Team).

List of Attendees:

Fourteen people attended, four of whom were OHCS staff:

Stephanie Back
Kelsyn Bevins
Joanna Burciaga
Julia Burns
Tamika Collins
Zoila Coppiano
Emily Edwards, OHCS
Melanie Fletcher, OHCS
Anabel Hernandez-Mejia, OHCS
Wendy Polanco
Brianna Rogers
Shauna Williams, OHCS
Ari Wubbold
Kurt [last name unknown]

The only oral comment was a question about whether OHCS could share the amount of eviction prevention funding that will be available in the 2025-27 biennium. No one signed up to present oral comments. No oral or written comments regarding the draft rules or updated program guidance were submitted during the hearing.

Summary of Oral Comments Short Version:

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

Zoila Coppiano, Community Action Washington County – Requested access to proposed changes. The hearing officer put the link to OHCS Administrative Rules website in the meeting chat and specified where the relevant materials could be found.

Wendy Polanco, Community Action Washington County – Inquired when and how much eviction prevention funding will be available from OHCS in the 2025-27 biennium. The hearing officer advised that this is not a space for that discussion but will connect with program staff to see if there are updates they can provide.

Summary of Written Comments (Short Version):

No persons submitted written comments at the hearing but did not testify.

The hearing was adjourned at 10:00 a.m. PT. The public comment period closed at 5:00 p.m. PT on June 30, 2025.

Consideration and Integration of Public Comments:

No public comments were received.

Appendices:

A – Transcript of public hearing

B – RAC materials

C – Transcript of RAC meeting

Transcript

June 16, 2025, 9:30 a.m.

□ **BENNETT Rachel * HCS** started transcription

BH **BENNETT Rachel * HCS** 0:09

All right.

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

Again, my name is Rachel Bennett, my pronouns are she/her, and I am the hearing officer.

Today is June 16, 2025, and the time is 9:33 AM Pacific Time.

The purpose of this hearing is to provide an opportunity for public comment on the rules proposed for adoption of OAR 813-261-0000, 0010, 0020, 0030, 0040, and 0050 for the Oregon Eviction Diversion and Prevention Program, or ORE-DAP, by OHCS regarding Senate Bills 5511 and 1530 from 2023.

The adoption of rules, including changes to the program guidance as adopted, therein, includes the following updates:

Added options for various categories for flexibility with OHCS approval required;

Changed minimum spending percentage language and removed maximum percentage requirements to allow grantees to only be held to a minimum percentage spending—or, a spending percentage, excuse me, goal per quarter;

Added descriptive language for snapshot method of income calculation;

Partner collaboration requirement removed;

Removed program summary in lieu of program intent;

Removed “targeting of funds shall not violate any fair housing or anti discriminatory requirements”;

Added definitions of culturally responsive organizations; and

For consistency, various forms of grantee sub recipients, sub grantee, etc., were changed to grantee and sub grantee.

OHCS invites comments about the 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

through 5:00 PM Pacific Time on June 30, 2025, which is the close of the public comment period.

Please submit comments to Rachel Bennett at Rachel.Bennett@hcs.oregon.gov. Comments received after 5:00 PM Pacific Time on June 30, 2025, 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 to OHCS capturing all comments and responses.

I will begin taking comments now.

If you wish to speak, please raise your hand or unmute yourself.

Give your name and the organization you represent and your comments.

It does not appear that we have any hands raised in the audience or anyone off mute, so we can go ahead and pause the recording. If anybody would like to provide oral comment, the hearing is open until 10:00 AM, so feel free to raise your hand, come off mute, put something in the chat, but there is no pressure to do so.

ZC Zoila Coppiano 4:44

How can I read a proposed changes?

BH BENNETT Rachel * HCS 4:49

We have published the rulemaking notice on our administrative rules website.

I will find that link and put it in the chat here for you if you'd like to review what we have proposed so far.

ZC Zoila Coppiano 5:02

Thank you.

BH BENNETT Rachel * HCS 5:09

And I do see a request to have the e-mail address in the chat for written comments.

That is an excellent request. I'll put that in right now.

The link that is in the chat includes the materials that were presented both for the notice of proposed rulemaking and also for the Rules Advisory Committee, which includes our impact statements.

But the public notice does include the draft rules and current draft program guidance

for review.

And again, as a reminder, public comments are open through June 30 at 5:00 PM.

WP Wendy Polanco 7:57

I'm just going to go with the \$1,000,000 question.

Do we know if we're going to get funding and any updates on that or eviction prevention?

BH BENNETT Rachel * HCS 8:08

We can have program staff circle back to provide answers on that. Unfortunately, at this public hearing, that's not really within the scope of what we can discuss. But understandably germane, and I will flag that for the eviction prevention staff.

WP Wendy Polanco 8:18

OK.

OK.

BH BENNETT Rachel * HCS 8:30

And I think I have your e-mail from other spaces, but if you have any specific concerns, feel free to send them to my e-mail from the chat, and we'll get in touch. All right, if we don't have any other questions at the moment, I am going to stop the recording.

We can always turn the recording back on if there are comments or questions, but we'll pause it for now and come back around 10:00.

□ **BENNETT Rachel * HCS** stopped transcription

BENNETT Rachel * HCS 9:59 a.m. PT

All right. Resuming the recording and the transcript.

Want to give folks one more opportunity for any comments, feedback, questions here in the public hearing space before we wrap up.

If you have any comments or questions, please raise your hand or come off mute.

Seeing no hands or unmuted microphones, we'll close the hearing.

Thank you all so much for attending.

It is now 10:00 AM Pacific Time and the hearing is adjourned.

I will stop the recording at this time.
Everyone have a great day.

● **BENNETT Rachel * HCS** stopped transcription

Rules Advisory Committee

Oregon Eviction Diversion and Prevention (ORE-DAP)

Date/Time: May 19th at 2:30 p.m.

Location: TEAM Meeting – [Registration is Required](#)

Participants: Committee Members (listed on second page)
+ Open to public for observation

Meeting Objectives

- Conduct Rules Advisory Committee with a diverse group of individuals who are directly impacted by the ORE-DAP program and subsequent eligibility of these housing resources.
- To create space to uncover different perspectives that can inform the implementation of the ORE-DAP program and gather feedback about the potential impacts as required by state rules development process.

Agenda

Welcome & Introductions

- *Be prepared to share:* name, pronouns, work affiliation and position, and what lens or unique perspective do you bring to today's discussion on the ORE-DAP program?

Background on ORE-DAP program development, previous engagements & RAC Responsibility

Opportunity to Review & Improve the Drafted Economic and Fiscal Impact Statements

- How will this rule remove barriers and/or otherwise improve access for the communities that you serve?
- Do you see opportunities to adjust the rule to better serve those communities?
- Once this rule is adopted, what will your organization need to support this change?

Impact Assessment

- State RAC procedures require assessment of impact in the following areas:
 - fiscal impact on state agencies, local government, or the public
 - potential of significant adverse impact on small businesses
 - reporting and other administrative activities required for compliance

Next Steps & Closing

- Review comments and feedback collected during the meeting
- Announce future engagement opportunities & public comment period

Rules Advisory Committee Members

RAC facilitator's contact information:
Jaci Davis; Jaci.Davis@hcs.oregon.gov

Rules Advisory Committee

Oregon Eviction Diversion and Prevention (ORE-DAP)

1. OHCS RAC Facilitators: Jaci Davis and Rachel Bennett
2. Marisa Ball, Marion County Housing Authority
3. Andrew Haley, Immigrant and Refugee Community Organization
4. Mitzi Mason
5. Breezy Poyner, Mid-Willamette Valley Community Action Agency
6. Stacie Sabourin, Mid-Columbia Community Action Council
7. Tara Ulrich, Sequoia Mental Health

Process Agreements from Rules Advisory Committee

This is intended to be a creative, brave space where we can think about how best to serve Oregonian with this rule change to remove barrier to access housing resources. To accomplish this, participants are asked to respect the following process agreements:

- **Seek common ground & understand divergence:** Practice “Yes, And” to affirm shared values while building on and expanding ideas. Be clear, yet constructive where you have differing experiences and opinions.
- **Share airtime:** Everyone deserves to be heard, and everyone has a piece of the truth. Challenge yourself to engage in ways that honor the voices and thinking space of others. Practice “W.A.I.T”: ask yourself, *Why am I talking? Or Why aren't I talking?*
- **Active virtual participation:** To respect the topic, each other, and to make the most of our time together, please practice active virtual participation to the maximum extent able. This includes making sure your zoom name is accurate, keeping your video on, using chat and Q&A functions, raising your hand to engage in open dialogue, responding to polls, engaging in virtual activities, and minimizing multi-tasking.
- **Take care of yourself:** We strive to facilitate high impact RACs where we use our limited time to the fullest, please do what you need to take care of yourself so you can participate fully and do your best thinking.

RAC facilitator's contact information:
Jaci Davis; Jaci.Davis@hcs.oregon.gov

Oregon Eviction Diversion and Prevention (ORE-DAP) Program

Rules Advisory Committee's role in reviewing the proposed impact statements:

OHCS has completed, to the best of our knowledge, the known and intended impacts for all required fiscal and economic rule filing statements. The RAC members should review the drafted impact statements and ensure they align with their expertise within a potentially impacted community. If there is feedback the RAC member can provide to ensure all impacts are recorded, edits and thoughts can be shared in writing before or during the scheduled RAC meeting.

OHCS will review all feedback received during the RAC meeting, and the hearing officer's report will contain response and be posted on the OHCS Administrative Rules website:

[Oregon Housing and Community Services : Administrative Rules : Get Involved : State of Oregon](#)

Impact Statement Review

Question 1: 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.

Proposed Statement: The adoption of ORE-DAP rules may have positive fiscal impacts on local governments, nonprofit grantees, and the public. The rules authorize use of state General Funds to: prevent evictions and homelessness; support interventions like rental assistance, legal mediation, and wraparound services. The extent of the impact is positive for public agencies and local partners by reducing downstream costs associated with emergency shelter, public health interventions, and rehousing services.

Question 2: Identify whether the rules will have a significant adverse impact on small businesses. What can be done to mitigate the impact on small businesses?

Proposed Statement: No significant adverse impact on small businesses is anticipated. The rules do not regulate business operations nor require expenditure from small businesses. To the extent that landlords (often small business owners) interact with the eviction system, the program may benefit them indirectly. Helping tenants remain stably housed ensures that landlords keep receiving rent payments and reduces their eviction-related turnover costs that non-payment evictions cause.

Question 3: Estimate the number of small businesses subject to these rules, identify types of businesses and industries with small businesses subject to these rules.

Proposed Statement: ORE-DAP rules do not directly regulate small businesses, but potential indirect interaction exists with small property management firms or landlords, legal service contractors and nonprofit community partners, and mediation providers. The estimate would be less than 100.

Question 4: Describe the projected reporting and other administrative activities required for compliance, including costs of professional services.

Proposed Statement: Grantees must engage in quarterly and annual reporting on expenditures and program outcomes, data entry into HMIS including timeliness standards, and budget change requests and fiscal tracking through OPUS. Administrative burden is typical of publicly funded grant programs and is eligible for reimbursement through administrative funds provided in the grant award.

Question 5: Identify equipment of supplies, labor and increased administration required to comply with rules.

Proposed Statement: Generally answered in 4 above. Compliance with the rules may require labor (staffing for data entry, case management, and fiscal tracking), supplies (secure file storage, computers, internet access, and HMIS-compatible systems), and administration (training, privacy notifications, and financial documentation). These are allowable expenses under ORE-DAP program guidance, with defined spending thresholds for administration and capacity building.

Question 6: Describe how OHCS involved small businesses in the development of these rules.

Proposed Statement: The ORE-DAP rules were developed primarily through internal stakeholder consultation and prior program data. While no formal small business advisory committee was involved, local implementation is designed through community-based partnerships, including contracts with nonprofit organizations and legal providers—some of which may qualify as small businesses.

Question 7: Draft statement identifying how adoption of rule(s) will affect racial equity in this state.

Proposed Statement: The ORE-DAP rules prioritize partnerships with culturally responsive organizations and targeted outreach to historically marginalized groups, including Black, Indigenous, Latinx, and other communities of color, as well as Veterans, persons with disabilities, and farmworkers. These rules positively affect racial equity by requiring culturally responsive service delivery, intentional referral networks across social service and legal sectors, and prioritization of underserved households at imminent risk of eviction. This supports the Oregon Statewide Housing Plan's equity goals and ensures housing stability interventions are delivered equitably across demographics.

Oregon Housing and Community Services Department

Chapter 813

Division 261

These rules establish standards and procedures for the administration of the Oregon Eviction Diversion & Prevention (ORE-DAP) program under Oregon Housing and Community Services (OHCS).

Purpose and Objectives

[813-261-0000]

Purpose for the Oregon Eviction Diversion & Prevention Program.

ORS Chapter 244

ORS 36.110[5]

ORS 456.515 through 456.725 (OHCS)

ORS 458.505 through 458.545

OAR 166-300 (Retention Schedule)

OAR 813-005 (General)

(1) The purpose of OAR chapter 813, division 261 of the administrative rules is to implement the OHCS ORE-DAP program. Funding for ORE-DAP comes from Senate Bills 5511 and 1530 (2023), as authorized by the Oregon legislature. OHCS is designated as the state agency responsible for administering state and federal antipoverty programs in Oregon.

(2) The purpose of ORE-DAP is to provide eviction prevention and housing stabilization services to households at risk of or currently experiencing homelessness.

Definitions

[813-261-0010]

Terms used throughout this division 261 may be defined in Oregon Revised Statute (ORS) or in the OHCS General Definitions (OAR 813-005-0005). Terms used within this division observe those definitions, except as defined below:

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

(2) "Homeless Management Information System" or "HMIS" is defined in 24 CFR 576.2.

Program Guidance

[813-261-0020]

Effective February 2024, the ORE-DAP program guidance with the requirements and standards therein is incorporated into and adopted as part of this division of administrative rules, by reference. The ORE-DAP program guidance may be accessed online at the OHCS website.

[<https://www.oregon.gov/ohcs/for-providers/Documents/manuals/ORE-DAP-Manual.pdf>]

Administration

[813-261-0030]

(1) OHCS may enter into agreements with grantees to provide eligible ORE-DAP services (see OAR 813-261-0040) in such manner as to provide holistic coverage statewide without duplication or overlap of services.

(2) OHCS will allocate ORE-DAP funds to all grantees through a formula established by OHCS prior to the allocation process. OHCS reserves the right to modify such formula at any time in its sole discretion.

(3) A grantee may establish subgrantees that meet the requirements of ORS 458.505(4) to provide eligible ORE-DAP services in the grantee's service area.

(4) Grantee representatives must attend and participate in ORE-DAP-related training made available or conducted by OHCS.

(5) A designated portion of ORE-DAP funds are reserved for grantees and their subgrantees to use for administrative costs. Grantees and their subgrantees may expend up to an amount determined by OHCS.

Use of Funds

[813-261-0040]

- (1) Use of ORE-DAP funds must be in compliance with ORE-DAP requirements for eligible households.
- (2) To the extent of available funding, eligible ORE-DAP services include administration, financial assistance/program, and program delivery. Examples of allowable services and activities within these categories are described in detail in the program guidance.
- (3) ORE-DAP funds must be used to supplement existing funds, to support existing programs, or to establish new programs. Grantees shall not use ORE-DAP funds to replace funds currently being received from other available sources or sources reasonably expected to be available to the grantee.

Remedies

[813-261-0050]

- (1) OHCS reserves the right to identify deficiencies in the performance of any grantee or their subgrantees discovered during compliance monitoring activities and take remedial action upon such grantees, including, but not limited to, terminating its funding agreement with a grantee, and requiring repayment of ORE-DAP funding.
- (2) To remedy any identified deficiencies, OHCS may:
 - (a) Issue a deficiency notice notifying a grantee of deficiencies identified through the monitoring process and provide documentation for the basis of such determination and the specific deficiency or deficiencies that must be corrected;
 - (b) Require the grantee to correct any deficiencies in a manner and time frame satisfactory to OHCS;
 - (c) Offer training and technical assistance related to such deficiencies to the grantee; and
 - (d) Offer the grantee assistance in the development of a corrective action plan. If a corrective action plan is allowed, OHCS must review the plan and issue a decision of approval or disapproval to the grantee.
- (3) OHCS must provide adequate notice to a grantee of remedial action that will terminate or reduce a grantee's eligibility for ORE-DAP funding. OHCS must provide the grantee an initial opportunity to appeal to the director of the Housing Stabilization Division of OHCS, whose decision may be deferred to the director of OHCS.
- (4) For appeals unable to be resolved internally, OHCS adopts the procedures detailed in ORS Chapter 183 for contested cases.

(5) Issuance of a deficiency notice will not constitute a waiver of other remedies available to OHCS or preclude OHCS from exercising such other remedies available to it under the ORE-DAP requirements, at law or otherwise.

Challenge of Grantee Action

[813-261-0060]

(1) Any household aggrieved by a grantee administering or providing ORE-DAP services may challenge the grantee's action by entering the grantee's administrative review process (see OAR 813-046-0081). Within 30 days of receiving the notice of review determination or refusal by the grantee to provide such administrative review, any household who received either an unsatisfactory determination or refusal of a review by the grantee may submit a written request for a grantee administrative review to OHCS.

(2) OHCS may accept or deny a request to conduct a grantee administrative review, in whole or in part, at its sole discretion. An OHCS review will be in the manner determined appropriate by OHCS and may include, but is not limited to, review of provided information.

(3) If OHCS accepts the review request, the requesting household, the grantee, and any relevant subgrantees will produce all information required by OHCS, including requested affidavits or testimony.

(4) Upon accepting the review request, OHCS may make a determination on such review request and require such remedial action as OHCS determines, in its sole discretion, to be appropriate.

Administrative Review by Subgrantee

[813-261-0070]

(1) Grantees must establish in writing a process satisfactory to OHCS that enables all potentially eligible households, having received ORE-DAP services or not, to contest a determination by the grantee or its subgrantees that denies, limits, terminates, or modifies ORE-DAP services.

(2) An aggrieved household may request an administrative review or fair hearing of a grantee's, or its subgrantees' contested action (as described in subsection (1) above). The grantee must allow a minimum of 30 days, from the time of contested action or the aggrieved household's discovery of such action, for which an aggrieved household may request a review or hearing.

The ultimate determination of an aggrieved household's discovery period is reserved to OHCS, in its sole discretion.

(3) A household remaining aggrieved after such review or hearing of a contested action may request administrative review of the grantee by OHCS (see OAR 813-046-0070).

(4) The grantee must inform OHCS and the aggrieved household in writing of any final administrative review determination made by the grantee, and the basis for same, within 10 days of such final determination.

DRAFT

Oregon Eviction Diversion & Prevention Program (ORE-DAP)

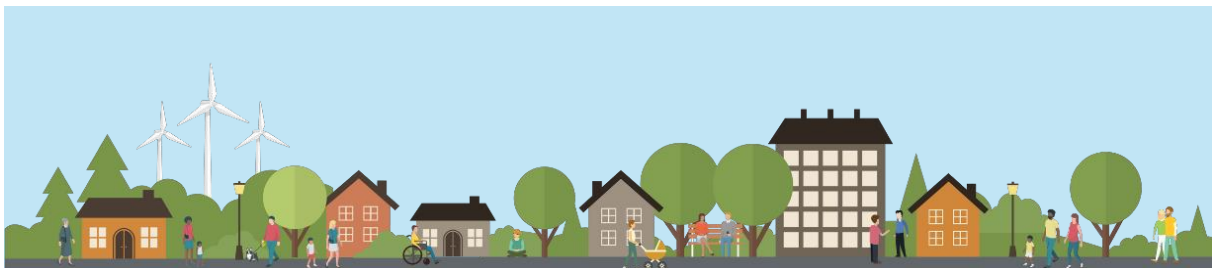


Program Guidance

Publish Date: June 2025

Contacts

Oregon Housing and Community Services
Housing Retention Section
(503) 986-2000
HSD.HousingRetention@HCS.oregon.gov



Change Log

Date	Description
5/13/2025	For consistency, various forms of grantee, subrecipients, sub-grantee etc. were changed to Grantee and Sub-grantee.
5/13/2025	Updated dates to match the new biennium.
5/13/2025	Updated Program Intent to reflect new biennium.
5/13/2025	Removed program summary in lieu of program intent.
5/13/2025	Added alternative options for various categories with OHCS approval.
5/13/2025	Added definitions of Culturally Responsive Organizations.
5/13/2025	Removed “Targeting of funds shall not violate any Fair Housing or anti-discriminatory requirements.”
5/13/2025	Changed title to Prioritizing Populations that are Disparately Impacted by Housing Instability and Homelessness.
5/13/2025	Partner Collaboration Requirement removed.
5/13/2025	Added description of “Snapshot” method for income calculation.
5/13/2025	Changed minimum spending language and removed limitation of maximum spending dates.

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Introduction

Program Intent

Oregon Eviction Diversion and Prevention Program (ORE-DAP)

OHCS is renewing our efforts from the 23-25 Biennium under our Oregon Eviction Diversion and Prevention (ORE-DAP) program to prioritize serving households most at risk of experiencing eviction and/or homelessness. These imminent risk households are currently experiencing housing insecurity and are at risk of experiencing housing loss within 21 days. All households served under the ORE-DAP program are low-income households, with an area median income (AMI) of 80% or less.

The ORE-DAP program utilizes state General Fund for expenditures and activities to assist low-income Oregonians at risk of eviction or facing homelessness. Funds allow Grantees to assist households by partnering with and providing a range of eviction prevention interventions such as rental assistance, coordination with partners who are providing legal services, mediation services, and other wrap-around interventions.

The purpose of the Eviction Diversion and Prevention Program is to promote a system change that will make evictions in Oregon a rare occurrence, while supporting households who experience evictions with humane, dignified interventions. OHCS also seeks to divert households from homelessness and further housing instability and to reduce the racial disparities evident in eviction cases.

Households must meet:

- Income eligibility of not more than 80% of the Area Median Income (AMI)
- Housing status requirements

Prioritizing Populations that are Disparately Impacted by Housing Instability and Homelessness

All grantees are encouraged to prioritize community members that are disparately impacted by homelessness and housing instability in their grant programs. This means that grantees must proactively consider steps to ensure that their grant programs are designed and implemented in a representative fashion in the communities they serve with marginalized communities at the forefront of their service delivery plan:

Grantees must proactively ensure that their grant programs are accessible to all eligible individuals and organizations, regardless of race, color, national origin, religion, sex, familial status, or disability. Providing targeted outreach and support to historically underserved or marginalized communities.

Ensuring that application review and selection processes are fair and unbiased.

Grantees must take proactive steps to reach out to and engage with communities that have been historically underserved or marginalized.

General Program Requirements

Key Performance Indicators

- **Implementation Reports:** Housing retention and eviction prevention services for the full number of households as outlined in your Implementation Report.

There is an expectation that your organization will serve a certain number of households with your 25-27 biennium ORE-DAP allocation. This proposed number of households served will be outlined by you in your Implementation Report and will be based upon your allocation as outlined in the allocation table that OHCS communicates.

- Increased housing stability for households at imminent risk of experiencing eviction or homelessness, as measured by the percentage of total program participant households who reside in permanent housing upon exit from the program or project funded by the program. The retention goal will be included in individual contracts

This key performance measure uses HMIS as the primary data source or as otherwise approved by OHCS.

Staff Training

Grantee and sub-grantee(s) staff that provide direct services and supervise staff who provide direct services and manage homeless services grants must receive relevant training. The training required must occur for staff minimally, within one year from the beginning date of employment and current staff must receive training minimally once every two years from the date of the previous training taken. Grantee and sub-grantee(s) must track who attended each training, the date of the training and the synopsis of the training. Records for training must be made available to OHCS, upon request. Training is an eligible expense of program development and must minimally include:

- Trauma Informed Services;
- Mental Health First Aid;
- Harm Reduction;
- Supporting Victims of Domestic Violence;
- Fair Housing; and
- For those using OHCS funds for Street Outreach, training must include Outreach Safety

Strategies.

Other trainings may be required by OHCS more often than every two years.

Privacy Notification

Grantees and sub-grantee(s) must have a written document that meets the requirements of this section and must have a stand-alone policy that describes how the Grantee or sub-grantee(s) are providing their Privacy Notification to applicants/participants.

A Privacy Notification must be provided for applicants/participants that identifies the following:

“Personally identifiable information is protected by federal laws (Privacy Act of 1974, as amended) and will be collected for the purpose of determining program eligibility, providing assistance/service, data collection, reporting and monitoring. Personally identifiable information will be shared with Oregon Housing and Community Services and other state agencies as is necessary to carry out the intent of an assistance or service program for the benefit of the person applying for such assistance or service and will be disclosed to Oregon Housing and Community Services without written authorization.”

Applicants/Participants may also be asked to sign a Release of Information by the Grantee or sub-grantee(s) that includes the Privacy Notification. If required to sign a Release of Information, in addition to the information above, such form must include a statement that:

“Refusal to sign such authorization cannot be the basis for denying program services to otherwise eligible applicants/participants. Applicant/Participant refusal to sign a Release of Information does not negate the inclusion of personally identifiable in secure reporting to Oregon Housing and Community Services. Oregon Housing and Community Services will de-identify applicant/participant demographic data for the purposes of reporting.”

Grantees and their sub-grantee(s) must document in the applicant/participant file that a privacy notification was provided to the applicant/participant either verbally or in writing. For all other purposes of collecting personally identifiable information, Grantees and their sub-grantee(s) must follow state and federal laws for the collection, use and sharing of applicant/participant information.

Grantees must ensure that sub-grantee(s) have policies that align with OHCS requirements and are consistent with the intent of such a policy as outlined by OHCS. OHCS retains the right to require modification of any policy that in its determination does not meet the requirements of the policy.

Confidentiality

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

Policies and Procedures pertaining to confidentiality must be in place, and must include:

1. Identification of how all applicant/participant records are secured and confidentially maintained.
2. A statement that all applicant/participant records must be maintained within state guidelines for the proper retention and destruction of records.
3. A requirement that all Grantee officers, employees and agents are aware of and comply with the Grantees' confidentiality policy and must include an acknowledgement of such policy, in writing.
4. A provision for the electronic collection of applicant/participant information which states that:
 - a. Computer terminals must be in a secure location, limiting access to only those persons who have a legitimate interest in and are responsible for applicant/participant records.
 - b. Computer monitors must be cleared (or a screen saver activated) immediately after accessing a(n) applicant/participant record.
 - c. Computer terminals must be on a "locked" mode or turned off if the terminal is unattended.
 - d. Access to personally identifiable HMIS data shall be given to only authorized personnel as necessary for performing the work required for OHCS-funded programs.
 - e. A statement that all records shall be open for review to federal and state authorized representatives, and auditors and/or examiners during their regular audits and monitoring functions of OHCS funded programs.

Grantees must ensure that sub-grantee(s) have policies that align with OHCS requirements and are consistent with the intent of such a policy as outlined by OHCS. OHCS retains the right to require modification of any policy that in its determination does not meet basic principles or requirements of such a policy.

Domestic Violence Shelter Confidentiality Provision

The address and location of shelters operating solely as domestic violence shelter facilities funded, partially or as a whole, by OHCS must be protected from public disclosure except as authorized by the director of the organization responsible for operations of the shelter in compliance with federal, state, or local rules and regulations. OHCS retains the right to obtain shelter addresses and locations funded, partially or in whole by OHCS; however, such information is protected from public disclosure except as authorized by federal, state, or local rules and regulations.

Service Termination or Denial of Assistance

Grantees and sub-grantee(s) must have written termination, denial, and grievance policies and procedures. The policies and procedures should be readily available to program participants either at intake or by posting the policy in a public place. A public place should include grantee website if services are provided in a remote capacity. It is important to effectively communicate these policies and procedures to applicants/clients and ensure they are fully understood.

Grantees and sub-grantee(s) are required to provide verbal documented or 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 Grantee's and sub-grantee's decision.

Grievances and Appeals

Grantees are required to have an established, written stand-alone policy for addressing applicant/participant grievances/appeal requests. Grantees must ensure that sub-grantee(s) have policies that align with OHCS requirements and are consistent with the intent of such a policy as outlined by OHCS. Applicants/Participants must have the right and opportunity to grieve/appeal any decision that terminates, denies, limits, reduces, or modifies benefits for any reason.

Applicants/Participants must be notified of their right for a grievance or appeal of such decision and Grantee policy must clarify how and when applicants/participants are notified of their right to grieve/appeal decisions. Such grievance/appeal policy can be posted in a public place, to include the grantee website; however, applicants/participants must receive a verbal documented or written notification for any decision that terminates, denies, limits, reduces or modifies any benefit. Written notification via email is acceptable.

Any person or persons designated by Grantee and sub-grantee(s) can complete the administrative review/appeal, other than the person who made or approved the decision under review/appeal or a subordinate of this person.

Applicants/Participants must still receive a denial notification even if the reason for denial is a Grantee's/sub-grantee's lack of funding. At a minimum, the policy must include the following components:

1. Informs the participant/applicant that they can contest any Grantee's or sub-grantee's decision that terminates, denies, limits, reduces or modifies any benefits and identifies the steps to follow to contest the decision;
2. Informs the participant/applicant of the reason for termination, denial, limitation, reduction or modification of benefit;
3. Allows any aggrieved person a minimum of thirty (30) days to request an administrative

review/appeal of such decision;

4. Informs the applicant/participant of their right to present written or oral objections before a person other than the person (or a subordinate of that person) who made or approved the decision;
5. Identifies what reasonable accommodations are available for applicant/participants who have language, mobility or disability barriers that would prevent them from participating in the review/appeal process and how to request such accommodations; and
6. Informs the applicant/participant and OHCS in writing of the final determination and basis for the decision within ten (10) days of the final determination.
 - a. A statement indicating whether and under what circumstances an order by default may be entered

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

Nondiscrimination

Grantees are required to comply with all state and federal statutes relating to nondiscrimination. Grantee must have a stand-alone policy that complies with the following:

1. A statement that Grantees will comply with all state, federal or local statutes, rules and guidelines for all protected classes and will not take any of the following actions based on race, color, national origin, age, religion, gender, familial status, or disability (federal) or victims of domestic violence, 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; or
 - Deny anyone access to a facility or service; and
2. Identifies how applicants or participants can request reasonable accommodation to access assistance or services, how that process is communicated to applicants and participants and how those requests are processed.

Grantees must ensure sub-grantee(s) have policies that align with OHCS requirements and are consistent with the intent of such a policy as outlined by OHCS. OHCS retains the right to require modification of any policy that in its determination does not meet basic principles or requirements

of such a policy.

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

Screening criteria cannot be discriminatory and must be consistently applied. A **priority population** means persons that are determined to have the greatest need and will receive services first; however, priority cannot be used as means of denying any person assistance and refusal to accept applications or provide information on services, or available housing, to any protected class, even if these groups do not fit into the priority population, is prohibited. For example, a provider might decide to give priority to applicants/participants who graduate from a tenant readiness education program that is inclusive of all protected classes. If two requests come in at the same time and both meet the screening criteria, the applicant/participant who also has the tenant readiness education experience could receive priority over the applicant who does not; however, providers must always accept the **first** request meeting their criteria or prioritization policy.

Grantees and their sub-grantee(s) must adhere to such prioritization required by OHCS.

For more information, see the Guide to Fair Housing for Homeless and Domestic Violence Shelter Providers produced by the Fair Housing Council of Oregon, or contact them directly at [ShelterGuide_FHCO_2023](#).

Limited English Proficiency

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

Grantee must have a LEP stand-alone policy that describes the following:

1. The actions Grantee took to identify LEP populations in their service area and cites any source(s) used for evaluation;
2. Defines actions Grantee will take to provide language assistance and address language barriers;
3. States how and how often staff will receive training about assisting LEP persons; and
4. Identifies that, minimally, LEP populations are evaluated biennially and that updates to the LEP Policy incorporates any needed changes to address new or emerging LEP populations.

Grantees must ensure that sub-grantee(s) have policies that align with OHCS requirements and are consistent with the intent of such a policy as outlined by OHCS. OHCS retains the right to require modification of any policy that in its determination does not meet basic principles or requirements of such a policy.

Grantees and sub-grantee(s) can create a written Language Access Plan (LAP) to provide a framework to document how the agency's programs will be accessible to all populations in their service area. Grantees and sub-grantee(s) who serve few persons needing LEP assistance can choose not to establish a LAP; however, the absence of a written LAP does not release Grantee's and sub-grantee's obligation to ensure LEP persons have access to programs or activities.

Conflict of Interest

In the performance of work, program grantees and sub-grantee(s) will create no potential or actual conflict of interest, as defined by ORS Chapter 244, for a director, officer, agent, or employee of Grantee or sub-grantee(s). A conflict of interest exists if, among other things, a decision or recommendation could affect the finances of the Grantee's or sub-grantee's officers, agents or employees or the finances of their officer's, agent's, or employees' relative. If a conflict of interest exists, the Grantee's or sub-grantee's officer, agent or employee must always give written notice of the conflict, and in some situations the officer, agent or employee is restricted in their ability to participate in the matter that presents the conflict of interest. No Grantee or sub-grantee(s) officer, agency or employee may carry out the initial evaluation required to obtain services for any person in which an actual or perceived conflict of interest does or would exist, unless in rare circumstances it is in the interest of the participant for the expediency of housing placement services or to create a seamless service delivery while keeping the participant engaged in services and such situation is documented in the participant file.

Grantee must have a conflict-of-interest policy that outlines the process for disclosing, in writing, any potential or actual conflict of interest. This includes procedures for staff when employees, board members, friends or family members apply for program services. Grantees and sub-grantee(s) must comply with conflict-of-interest standards for both individuals and organizations. Grantee and sub-grantee(s) must keep records to show compliance with program conflict of interest requirements.

Organizational

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

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

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

Individual

For the procurement of goods and services, Grantee and sub-grantee(s) must comply with the codes of conduct and conflict of interest requirements.

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 Grantee or sub-grantee(s) 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, can 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 themselves or for those with whom they have a family or business tie, during his or her tenure or during the one-year period following their tenure.

Grantee must have a Conflict-of-Interest stand-alone policy that complies with the following:

1. States that Grantees officers, agents or employees will create no perceived, potential or actual conflict of interest;
2. Identifies how officers, agents and employees are notified of policy;
3. Outlines the process for disclosing, in writing, any potential or actual conflict of interest;
4. Identifies the process the Grantee will follow when notice of a perceived, potential, or actual conflict of interest is received and must include procedures for staff when employees, board members, friends or family members apply for program services; and
5. Identifies how records are kept of perceived, potential, or actual conflicts of interest.

Grantees must ensure that sub-grantee(s) have policies that align with OHCS requirements and are consistent with the intent of such a policy as outlined by OHCS. OHCS retains the right to require

modification of any policy that in its determination does not meet the basic principles or requirements of such a policy.

Applicant Eligibility

Program	Housing Status Eligibility	Income Eligibility	Eligible Program Components
ORE-DAP	• Literally homeless • Imminent risk of homelessness • Homeless under other federal statutes • Fleeing Domestic Violence • Unstably housed	At or below 80% AMI	• Program Delivery • Program Expenses • Administrative Costs

- Program participant household must reside in the state of Oregon
- With income equal to 80% area median income (AMI) or lower AND
- Be experiencing homelessness or housing instability

OHCS allows local prioritization processes except for ensuring that program participants who are at most imminent risk of eviction need to be prioritized for services and supports. This is generally those who have an active eviction case, or who have received an eviction notice.

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

Housing Status

Homeless and/or unstably housed households are eligible to receive ORE-DAP funded services. Housing status may be obtained through a self-certification process alone without regard to further documentation of housing status. Eligible applicants for program services must meet one of the following categorical definitions of homeless or unstably housed and be at risk of homelessness.

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

- Living in a primary night-time residence that is a public or private place not designed for human habitation (including, but not exclusive to, a car, park, abandoned building, bus or

- train station, airport or camping ground);
- Living in a publicly or privately operated shelter designated to provide temporary living arrangements (including congregate shelters, transitional shelter, and hotels or motels paid for by charitable organizations or by federal, state or local government programs); OR
- Exiting an institution where individual or family has resided for 90 days or less AND who resided in an emergency shelter or place not meant for human habitation immediately before entering that institution.

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

- The primary night-time residence will be lost within 21 days of the date of application for homeless assistance.
- No subsequent residence has been identified; **AND**
- The individual or family lacks the resources or support networks (e.g., family, friends, faith-based or other social networks) needed to obtain other permanent housing.

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

- Are defined as homeless under other listed federal statutes;
- Have not had a lease, ownership interest, or occupancy agreement in permanent housing during the 60 days prior to the program assistance application;
- Have experienced persistent instability as measured by two moves or more during the preceding 60 days; **AND**
- Can be expected to continue in such status for an extended period of time due to special needs or barriers.

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

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

Category 5: Unstably Housed – Individual or family who:

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

❖ High risk may be demonstrated by but is not solely defined as: having experienced a loss of income or other threat to housing stability. In addition, sharing housing of

other persons due to loss of housing, economic hardship, or a similar reason (“doubled up”) may demonstrate a high risk of losing current housing. Owing rental arrears or not having the ability to pay for future rent may also demonstrate high risk status.

Income

ORE-DAP provided services require applicants to be low income; household must be at or below 80% of area median income.

Additional supplemental employment income issued during the COVID-19 pandemic is excluded for the purpose of income eligibility requirements. 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.

Income includes the current gross income of all adult household members. Income earned by household members who are minors or full-time students and are not considered heads of household is excluded. While household assets should be identified to determine that a program applicant lacks the resources to obtain or retain permanent housing, they are generally not counted as income. There are other exceptions to income based on federal guidance, so please reach out to OHCS for additional clarification on what is counted toward income.

The grantee process for determining income eligibility and the documentation required should be consistent and must be applied equally across services that use or is supported by ORE-DAP funding. Grantees’ policies and procedures must identify what method they will use to determine income eligibility and exceptions to the policy, if any. Documentation methods may include:

- Previous 12 months of income
- “Snapshot” of current income (at time of assessment)
- Previous 30 days of income

Income may be documented through self-certification when income documentation for the household is not accessible.

Convert periodic wages to annual income by multiplying:

- 1. Hourly wages by the number of hours worked per year (2,080 hours for full-time employment with a 40-hour week and no overtime);*
- 2. Weekly wages by 52;*
- 3. Bi-weekly wages (paid every other week) by 26;*
- 4. Semi-monthly wages (paid twice each month) by 24; and*
- 5. Monthly wages by 12.*

To annualize other than full-time income, multiply the wages by the actual number of hours or weeks the person is expected to work.

A “Snapshot” of current income can be used as an exception to Grantee’s policies and procedures, when warranted and documented in the client file. **Snapshot Method** means the process of determining the estimated annual income that uses a snapshot of the household income at the time of application. It does not rely on a specific period in the past to determine the annual income amount. The method must only be used when a household’s income has recently changed drastically and is not expected to change from the time of the snapshot (such as in a recent job loss) or when income tends to be very volatile. The snapshot method cannot be used to avoid accounting for income.

1. **Standardization:** Grantees/sub-grantee(s) have the discretion to calculate income standards in a manner best suited for the organization, based on their own policies. Example policies include using a year-to-date amount divided by the number of months in the year-to-date amount, using the last 30 days of paystubs or the last 60 days of paystubs. The main requirement is that the way income is calculated is consistent between clients. Exceptions to the standard way of calculating income must be identified in policy (such as circumstances in which a snapshot method is used).
2. **Consistency:** Grantee/sub-grantee(s) must be consistent in how income calculation standards are applied, even if that means it excludes someone from being able to be assisted. Grantee/sub-grantee(s) cannot use the most current paystub for one person, the last 30 days for another, and a year-to-date for someone else, especially if the fluctuating use shows that it is being done to under-calculate income. Income calculation standards must be documented in policy and such policy will be subject to OHCS monitoring.
3. **Client quit a job:** If an applicant quits their job within the past 30 days and meets other eligibility, assistance may still be provided; however, the income can be calculated on the snapshot method. The snapshot method is an exception to a standardization of income calculation and must be identified in the Grantee/sub-grantee(s) policy as well as documented in the client file as to why the exception was granted.
4. **Overtime and Bonuses** cannot be excluded from income calculations. Income cannot be excluded just because it would put the applicant/participant over the income limit. Year-to-date income methodology is an effective way to determine income when income is varied and includes overtime or bonuses.

5. **Income from a live-in aide** is not considered part of the income determination; however, a live-in aide must meet the following criteria:
 - a. Live-in aide means a person who resides with one or more elderly household member, or near-elderly household member, or member of the household with disabilities, and who:
 - b. Is determined to be essential to the care and well-being of the household member;
 - c. Is not obligated for the support of the household member;
 - d. Would not be living in the unit except to provide the necessary supportive services; and
 - e. Provides documentation of payment for the live-in aide services provided to the household.
6. **Child tax credits, Earned Income Tax Credits, Stimulus Payment and Tax Refunds** are not considered income.
7. **Self-employment:** When calculating self-employment, use the previous year's tax information, if available. Use the gross income and subtract out the deductions claimed on Schedule C to get a net income. Schedule C is the Profit and Loss form used for a Business, which deducts expenses, such as their vehicle, supplies, offices expenses, travel, utilities, etc. The net income is then divided by 12 and the result is used for the household's monthly income.

More information on income can be found on the OHCS website in the Income Inclusions and Exclusions form.

Eligibility Documentation

Eligibility may be documented through Self Certification and/or within guidelines for Remote Application and Documentation. Self-Certification may include, but is not limited to:

- Income for the household if other sources of documentation are not accessible
- Housing status at intake to program

Please note that Housing Status does not need to be verified through further documentation other than self-certification, but a grantee may wish to obtain more documentation if needed to establish eligibility. Income documentation such as paystubs, SSI or SSDI paperwork, etc. should be sought from clients but if documentation is unavailable immediately, self-certification of income is allowable.

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

Grantees and sub-grantees are required to develop and maintain policies and procedures for the use of a remote application and eligibility documentation process and be available for review by OHCS, upon request. Such policies and procedures must be applied equally across services that use or are supported by ORE-DAP funding.

Grantees and their Sub-grantees must have controls in place to ensure compliance with their policies and procedures and prevent fraud. Grantees and Sub-grantees 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, Grantees and Sub-grantees must have in place reasonable validation or fraud prevention procedures to prevent abuse.

Agency policies and procedures must address the following elements:

- In what circumstances will a remote application and documentation process be used.
- Verification of the identity of the applicant.
- Verification and documentation of qualification for assistance in relation to program eligibility criteria.
- Verification and documentation as appropriate for ongoing demonstration of eligibility; and
- Notification and documentation to client in relation to release of information, service denial or termination and grievance and appeal requirements.

Citizenship and Immigration Status

OHCS expects Grantees to provide services regardless of immigration status to all eligible households. Immigration status or citizenship may not be used as a reason for denial of services.

Prioritization Guidance

OHCS recognizes that prioritization of resources is a reality when there is more need than available resources. OHCS also notes that prioritization about who is served first needs to consider local factors and needs while also ensuring that discrimination and fair housing laws are followed accordingly. The rest of the determination processes need to be documented by grantees and partners to determine the best needs for each local community. To that end, OHCS has the following criteria for prioritization under this program:

OHCS is requiring that households who are facing an active eviction case be prioritized for funding over those who are simply at risk of eviction. Grantees must develop a written strategy for identifying and prioritizing households that have received an eviction notice, or have a pending first appearance, have a written notice to vacate, or otherwise at imminent risk of eviction. We recommend that grantee work closely with the Oregon Eviction Defense program, a statewide

program of the Oregon Law Center, and other legal services providers to align resources and support people with eviction cases.

Allowable Program Components and Expenditures

Program related expenses are eligible for the period starting with each grant agreement through the end of that agreement Rental arrears that occurred prior to this time frame are an eligible program expense when it poses a risk to the housing stability of the participant.

Assistance cannot be provided to households who reside outside of Oregon or for expenses outside of the state of Oregon.

Payments may be made directly to households who are experiencing housing instability when a landlord is not responding to or accepting payments. This option should only be used if outreach to the landlord is unsuccessful. grantee must have a written policy outlining the process in which a direct payment to a household is the most expedient option; it must include sufficient documentation of attempts to make payment to landlord and the explicit purpose for the payments must be an eligible expense.

Assistance may not be used for providing hotels and motels to clients who are experiencing homelessness through provision of Non-Congregate Shelter without approval from OHCS. The source of funds does not allow for this type of sheltering activity and must be spent on the provision of anti-eviction and re- housing activities as detailed below. Funds can be used to re-house a client who is living in a shelter funded through other means.

Please note, due to the complex nature of evictions and the needs that people may have, there may be overlap between different categories listed below. Budgets in OPUS for the ORE-DAP program do not need to differentiate between these categories at the onset due to the need to be responsive to local needs and unique client circumstances.

The following categories are allowable expenditures under the ORE-DAP Program:

Allowable Expenditures

CATEGORIES
<i>These terms are used throughout the document and defined below.</i>
PROGRAM DELIVERY EXPENSES

Outreach and engagement activities, including Street Outreach	Outreach and engagement activities associated with the community served by the grantee. Street outreach is a service that engages with people experiencing homelessness who are living outside or in public spaces. The goal of street outreach is to help people experience houselessness move into permanent housing and connect them with other supports and resources. These expenses can include outreach staff time, transportation, promotional materials, meetings, and events. Please see “Safety in Outreach” section below chart for more information.
Translation Services	Development of a language access plan and translation of web and print materials into languages most utilized in the service community. Expenses tied to enabling access to services for users with limited English proficiency.
Web, print, social media, and advertising	Promotions and advertising for the grant program and other available housing-related services provided by the grantee. Web media, print media, social media advertising and promotional expenses.
Research and development	Grant program design, research to determine community needs and service delivery best practices, third-party development and programming, software development costs, pilot programming, and program testing.
Program implementation planning	Planning activities related to preparing to implement the program. Planning meetings, events, onboarding, and training expenses. Providing technical assistance and support to help sub-grantee(s) build their capacity to ensure they provide culturally responsive services.
Equity and accessibility efforts	Expenses tied to accommodations and efforts to ensure the program is delivered with culturally responsive services, and outreach efforts are made to reach the most vulnerable and underserved Oregonians-Expenses tied to building culturally responsive service delivery into the program design and ensuring the program is accessible to those who are differently abled or have historically been underserved by state resources and are disparately impacted by housing instability.
Program evaluation	Regular evaluation of program efficacy, outcomes, generating reports, charts, and visualizations. May include materials and expenses tied to these efforts.

Training & Technical Assistance	Staff training related to the development and implementation of the grant program. This includes training materials, training space rent and expenses, equipment, and transportation.
HMIS and data system expenses	Set up and maintenance of HMIS access and utilization. This includes hardware, set-up fees, maintenance, software, subscription fees, and training needs.
Personnel – Staff time	Staff wages, salaries, and employment benefits for staff who deliver services and those who directly oversee program operations.
Direct to Program Non-Personnel Expenses	Direct expenses tied to the operation of the program as space rent, office supplies, equipment, and vehicle leasing tied directly to staff operating the program.
Capacity Building (5% max)	Please see “Capacity Building” below chart for more information.
Case Management Services	Direct services and referrals tied to activities associated with individualizing and integrating employment, health care, connections to benefits, and other housing-related options for or with an individual or household. Case managers assist clients in accessing and coordinating any services necessary to address their housing instability. It is a collaborative process that involves planning, implementing, monitoring, and evaluating the options and services for each client. Please see “Case Management Services” below chart for more information.
Housing and Health Navigation Services	Housing navigation and housing education are services that help individuals and families experiencing housing instability or homelessness to identify opportunities and address barriers to housing. A specialist who assists people in locating and securing affordable housing is called a housing navigator. Healthcare navigators can help patients navigate the clinical care system. Responsibilities include helping patients to find and access treatment. Housing stability is a social determinant of health and health stability supports housing stability. Thus, we view them as interdependent.
Hotline and in-person services	Telephone and web data systems, call routing, tracking, and data collection. HMIS expenses billed separately. On site service delivery and setting up trauma-informed spaces for clients to converse privately related to their cases and housing or case concerns.
Participant Support Meetings and Events	Meetings and events involving program participants as a part of the grant program to engage in supportive activities such as cohorts, services geared toward gaining employment, raising income, budgeting, educational opportunities, case

	management activities, etc.
Transportation/Travel	Transportation, meal expenses, and lodging tied to approved grant activities such as out-of-area educational conferences. Travel is allowable as a direct program cost when such travel will provide direct benefit to the participant or grant program.

PROGRAM EXPENSES	
Rent and utilities payments and arrears	Past due rent and utilities payments, without a maximum number of allowable months.
Future rent and utility assistance	Future rent and utility payments, without a maximum number of allowable months. Grantee must have policy related to serving program participants and community equitably.
Security deposits	Security deposit payment in current unit or unit household is moving into to attain housing stability.
Moving expenses	Moving expenses related to a new housing unit or out of a housing unit that does not offer stability. Expenses can include moving truck, packing supplies, movers, and helpers for differently abled households. No moving into or out of the state of Oregon will be supported by program expenditures. Services are for residents of Oregon and those seeking long-term housing stability in the state of Oregon.
Application fees	Rental application fees for new housing unit.
Civil legal services (legal advice, legal representation, court fees)	Civil legal services are legal assistance to low-income households who have non-criminal legal concerns. Legal services may include: Mediation to help disputing parties to reach a mutually agreeable settlement. Arbitration to make a binding decision to settle a dispute. Preparation of legal documents. Representation of clients in negotiations, court, or arbitration.

Landlord/Tenant Mediation/Legal Services	Mediation is “a process in which a mediator assists and facilitates two or more parties to a controversy in reaching a mutually acceptable resolution of the controversy. Includes all contacts between a mediator and any party or agent of a party, until such time as a resolution is agreed to by the parties or the mediation process is terminated.” ORS 36.110[5]). In landlord-tenant mediation, a neutral third party, the mediator, helps landlords and tenants resolve conflicts and disputes related to their rental relationship. Mediation may or may not be mandatory depending on whether it falls under Chapter 90 Statute. The mediator works to facilitate a mutually beneficial, and a legally-binding (if signed by both parties) resolution to their dispute. Mediation is an informal and voluntary way of resolving disputes between tenants and landlords.
Pet rent and pet deposit	Pet rent payments and payments of security deposits for pets in housing units. Per statute, landlords are not able to charge pet rent or deposit for service animals.
Housing-related fees	Rent/utility late fees, housing-related court fees, and utility reconnection fees.
Work supports	Expenses including training costs, transportation assistance, childcare and eldercare needs, and clothing to support employment needs.
Furniture and household goods	Up to a maximum of \$2000 per household for basic furniture and household goods to make the unit habitable for the household needs. These expenses can include bed, bed frame, seating, dining table, needed lighting, kitchen supplies, food supplies, bathroom supplies, personal protective equipment, etc.
Transportation	Costs, such as bus/train passes, gas vouchers, Uber/Lift/Cab fares, car repairs/insurance are allowable, and travel related expenses to support participant appointments for employment, benefits, medical needs, or any other related activity tied to their housing stability plan.

ADMINISTRATIVE COSTS	
Admin expenses	Costs and expenses associated with the administration of the grant. This can include direct and indirect costing of Operations, IT, Executive Team, Human Resources, and Finance expenses tied to administering the program.
Indirect to Program Non-Personnel Expenses	Operation of the program and overhead expenses, such as rent, utilities, office supplies, equipment, and vehicle leasing.

Case Management Services are inclusive of:

- Intake and assessment, including time spent assessing a household and determining whether or not the household is determined eligible;
- Once an eligibility determination is made, case management services also work to connect clients to resources within the organization, or external to the organization if needed for stability supports;
- Direct client services include developing an individualized housing and service plan, monitoring and evaluating household progress, identifying creative and immediate housing solutions outside of the traditional homeless service system (diversion), and ensuring that households' rights are protected;
- Services that increase access to the income supports. This includes increasing access to earned income, or access to disability benefits programs administered by the Social Security Administration for eligible adults who are experiencing or at risk of homelessness and have a serious mental illness, medical impairment, and/or a co-occurring substance use disorder (i.e., SOAR or similar style services);
- Services for clients entering into or are in permanent supportive housing and need assistance to stabilize;
- Placement services includes services or activities designed to assist households in locating, obtaining, and retaining suitable housing, tenant counseling, assisting households to understand leases, inspections, securing utilities, making moving arrangements, and representative payee services concerning rent and utilities;
- Mediation and outreach to property owners/landlords related to locating or retaining housing;
- Data entry

Gift Cards

Gift cards issued to eligible clients for the purpose of purchasing items must be in support of the participant's housing stability goals and allowable under OHCS funding, provided that adequate documentation exists to support the purpose and the expense and there is an OHCS-approved Gift Card Policy with established policies and procedure in place to address the process. Use of gift cards must be rare, for very specific housing-related goals and only when other payment options are not available.

Gift Card Requirements

- The expense must be allowable under program guidance and must show a connection to housing stability. Programs will be monitored, and expenditures will be disallowed without sufficient documentation.

- Gift cards must be purchased and issued to clients within the same grant period. For any gift cards that are not issued to clients before the close of the grant period in which they were purchased, grantees must submit a negative request for funds for the grant period in which the gift cards were purchased totaling the amount of the unissued gift cards and other non-OHCS funds must be used for the cost of the gift cards.
- Grantee must maintain complete record of gift card purchases and recipients. Gift cards must be kept in a secure location prior to being issued.
- Client must receive documentation that identifies the purpose and intent of the gift card and must acknowledge, by written, legible, wet signature, the same, and such documentation must be kept in the client's file.
- Grantee or sub-grantee must develop a gift card policy and obtain **OHCS approval** that includes:
 - Justification as to why gifts cards are issued rather than providing assistance through conventional means.
 - Authorization levels of approval for gift card purchase and issuance within grantee or sub-grantee's organization.
 - Dollar limitations per client/participant.
 - Frequency in which gift cards can be issued in lieu of other alternative payment options.
 - Requirement that issuance of gift card is in support of a client's plan to increase housing stability, and that plan is included in the client file.

Documentation: policy must require client-facing policy that identifies allowable purchases and use of gift card. Policy document must be signed, or verbal attestation, as received and read by or to the client. One copy should be provided to client, and one copy should be kept in clients' file.

Eviction System – Capacity Building (5% maximum of full award)

For the sake of brevity, eviction prevention system capacity building will be referred to simply as capacity building.

Capacity building is defined as activities that assist organizations to develop networks to undertake joint activities and coordinate their services to achieve common goals and provide better service to participants experiencing housing instability. Capacity Building must be used to increase the ability of a Grantee or local system to deliver OHCS funds for eviction prevention. If a grantee wishes to hire technical assistance consultants, it is an allowable expenditure.

Funding can be used to support projects and activities that increase a grantee's service area's capacity to provide emergency housing and homeless services. Capacity building includes capacity building internal to the grantee as well as within the external service area and community. Capacity building is only to include increasing a grantee/sub-grantee's capacity to deliver OHCS funds. The

specific focus of capacity building is to enhance local eviction prevention provider capacity to design and implement strategies to build, rebuild and sustain community capacity – especially in deprived communities and in towns, cities and regions suffering from economic decline, worklessness and benefits dependency. Supporting organizations with mentoring, finance, strategy building, and system analysis are a vital part of capacity building. Records of capacity building activities must be kept in accordance with OHCS Records Requirements, inclusive of meeting records, outcomes, and evaluation records, along with any fiscal records associated with the project.

Objectives of Capacity Building are:

1. To enhance, or more effectively utilize, skills and abilities, and resources of eviction prevention service providers;
2. Strengthen understandings and relationships amongst eviction prevention service providers; and
3. Address issues of values, attitudes, motivations, and conditions to support housing stability activities in a sustainable manner.

Capacity Building is not a category through which to simply share program information and available services with other providers which can be accomplished through marketing and outreach efforts. Capacity building projects are activities that are specifically designed to increase the community's ability to provide eviction prevention services. Costs associated with advertising and public relations are designed solely to promote the grantee/sub-grantee organization, and their activities are allowable to be billed under Program Delivery.

Transportation

Costs, such as bus/train passes, gas vouchers, Uber/Lift/Cab fares, car repairs/insurance are allowable. Payments that allow participants to use public transportation are the highest priority and must be considered first for the purpose of attending required appointments, job search or other critical services. Case managers have the discretion to provide repairs/gas/insurance for a client's personal vehicle. Case managers must document why a client's personal vehicle option is preferred over public transportation options and that the expense will lead to the stabilization of housing. Costs associated with a vehicle not owned by the client are not allowed. Client must have a valid driver's license.

OHCS funds cannot be used to build assets, such as the purchase of a vehicle or loan payments and cannot be used for debt payments, such as traffic violations/fines to obtain a license. Private transportation options can include minor vehicle repair, car insurance, and the least costly option for vehicle registration, with written grantee policy on use of funds for these services and such policy must be available to OHCS upon request. Grantees must ensure that grantees have policies that align with OHCS requirements and are consistent with the intent of such a policy as outlined by OHCS. OHCS retains the right to require modification of any policy that in its determination does not

meet basic principles or requirements of such a policy. For example, repair to a vehicle might be preferable to a bus pass if the community does not have public transportation or if the client works at night when public transportation is not operational.

Transportation does not include insurance to pay for roadside assistance (such as membership to AAA) or traffic violations or any collection costs associated with these fines. Insurance includes only general liability insurance as required by the State of Oregon; however, comprehensive/collision coverage can be allowed, but only when there is documented evidence that such coverage is a requirement of a vehicle loan. Insurance is paid before the period of service and vehicle owners have 10 days in which to make payment; therefore, insurance arrears is not a factual cost and is unallowable.

Safety in Street Outreach

Safety in service delivery – the grantee must have a written policy (such policy must be made available to OHCS upon request, grantees must ensure that sub-grantee(s) have policies that align with OHCS requirements and are consistent with the intent of such a policy as outlined by OHCS. OHCS retains the right to require modification of any policy that in its determination does not meet basic principles or requirements of such a policy) regarding staff safety in service delivery, which may include the following:

- Never go out alone. Teams of two should be considered the absolute minimum. Establish a system in which threats to safety to teammates are identified unbeknownst to others while conducting street outreach.
- The office or clinic (e.g., team members not in the field) should always know the location of outreach teams. Keep to a set schedule and use Smartphones that have GPS functionality built-in.
- Wear matching clothing, ideally in bright colors, so the street outreach team is easily identified as the street outreach workers.
- Linkages with crisis response teams and behavioral health support are essential, especially if outreach teams lack a behavioral health provider.
- Use trauma-informed de-escalation training for outreach staff.
- Use harm reduction principles: safety and comfort are two different things, as are perceived threats to safety and actual threats. Witnessing drug use is not necessarily a threat to safety, for example.
- Create time and space for street outreach teams to debrief and process any threatening events. Trauma-informed supervision of outreach personnel is essential.

Duplication of Benefits

Per the Grantee's grant agreement/contract Standard Terms and Condition, OHCS funds shall not

be issued and may be required to be returned if a benefit has already been paid through another source or sources. Upon discover that a duplicate payment has been made, Grantee has thirty (30) days in which to return the duplicate payment. Grantees and sub-grantee(s) are responsible for ensuring that benefits issued do not duplicate other benefits for the same payment/service using HMIS and any other data system for which the Grantee or sub-grantee(s) have access. Grantees must have a policy that identifies:

- How they track use of benefits to prevent duplication of benefits; and
- Grantees must ensure that sub-grantee(s) have policies that align with OHCS requirements and are consistent with the intent of such a policy as outlined by OHCS. OHCS retains the right to require modification of any policy that in its determination does not meet basic principles or requirements of such a policy.

Records Requirements

Case Files

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

File documentation will be the basis of OHCS monitoring to ensure adequate documentation of case files. Sample forms are available on the OHCS website.

Records Access

Grantees and their sub-grantee organizations are required to permit OHCS, the Oregon Secretary of State's Office, the federal government, and the duly authorized representatives of such entities access to, and the right to copy, all program client and fiscal records for such purposes as research, data collection, evaluations, monitoring, and auditing. At the sole discretion of OHCS, access to records shall include the removing of records from the Grantees' and grantee(s)' office. Unless otherwise stated in the compliance section of the Grantees contract with OHCS.

Records Retention

Grantees and sub-grantee(s) shall retain all program records pertinent to client services and expenditures incurred under ORE-DAP program in a manner consistent with the requirements of

state and federal law. This includes, but is not limited to, those requirements listed in Administrative Rule, Operations Manual and Special Schedules.

Find the OHCS Special Schedule at the Oregon State Archives:

- https://sos.oregon.gov/archives/Pages/state_admin_schedules.aspx

Find the State Agency General Records Retention Schedules at the Oregon State Archives:

- https://sos.oregon.gov/archives/Pages/records_retention_schedule.aspx

Grantees and sub-grantee(s) 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 ORE-DAP program funding, or until the conclusion of any audit, controversy or litigation arising out of, or relating to ORE-DAP program funded programs.

Data Entry

HMIS

Except for Domestic Violence victims and other specific circumstances approved by OHCS in advance, grantees and their sub-grantee(s) are required to enter ORE-DAP program-related client data into the community's Homeless Management Information System (HMIS). Victim Services Providers, serving survivors of domestic violence, are also required to collect client data, but will not directly enter data into an HMIS. Victim Service Providers must enter client level data into a comparable database that complies with HMIS requirements. Grantees and sub-grantee(s) are responsible for acquiring and documenting informed written consent from program participants and protecting program participant's confidentiality.

OHCS reserves the right to request other key datasets including the following:

- Detailed budget and spending reports, especially the breakout of costs spent on clients (financial assistance) and costs spent on program delivery (staffing, subcontracts, and related costs).
- Number of clients served to date, including demographics and other trends as indicated in the HMIS system.
- Number of requests for assistance to date.

Additional guides and assistance with HMIS data entry, data quality and reporting may be found

on our website at: <https://www.oregon.gov/ohcs/for-providers/Pages/index.aspx>.

Data Timeliness

Timely and accurate data entry is critical to ensuring meaningful data analysis and reporting. For all project types, **Grantees and sub-grantee(s) must enter data within 72 hours or sooner**, depending on local CoC HMIS policies.

DRAFT

Data Collection Requirements for FY23-25 Contracts (HMIS and HMIS-Comparable Systems) and EO 23-02

	EO 23-02			BAFI-NATO			CSBG(9)	EHA and DRF (1)			ERA (Elderly)			ESG and ESG-CV1/CV2			HSP		H-TBRA		NAV CTR		ORE-DAP	PTX	RAY			SHAP									
DATA ELEMENT or EVENT	SO	ES	RRH	SO	ES(2)	HP	RRH	TH	SSO	SO	ES(2)	HP	RRH	TH	HP	RRH	TH	HP	RRH	TH	HP	RRH	ES	SO	SSO	ES	TH	SO	ES(2)	HP	RRH	TH	PSH	SO	ES(2)		
Name & Name Data Quality	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	
Social Security No. & Data Quality	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	
Date of Birth and DOB Data Quality	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	
Race (Primary and Secondary)	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	
Ethnicity	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	
Gender	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	
Veteran Status	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	
Disabling Condition (Y/N)	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	
Project Start & End Dates	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	
Destination	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	
Relationship to Head of Household	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	
Client Location (CoC)	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	
Housing Move-in Date			X			X						X		X			X		X			X							X	X	X	X	X	X			
Prior Living Situation	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	
Current County of Residence (3)	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	
Percent Of AMI			X			X	X	X	X			X	X	X	X		X	X	X	X	X	X	X			X			X	X	X	X	X	X			
Level of Households Income (FPL)			X			X	X	X	X			X	X	X	X		X	X	X	X	X	X						X	X	X	X	X	X	X			
Income & Sources	X	X	X			X	X	X	X			X	X	X	X	X	X	X	X	X	X	X						X	X	X	X	X	X	X			
Non-Cash Benefits	X	X	X			X	X	X				X	X	X	X	X	X	X	X	X	X	X						X	X	X	X	X	X	X			
Health Insurance	X	X	X			X	X	X	X			X	X	X	X	X	X	X	X	X	X							X	X	X	X	X	X	X			
Specific Disabilities	X	X	X			X	X	X				X	X	X	X	X	X	X	X	X	X	X	X	X													
Domestic Violence (Y/N)	X	X	X	X	X	X	X	X		X	X	X	X	X	X	X	X	X	X	X								X	X	X	X	X	X	X	X	X	
If 'Yes' to DV, currently fleeing?	X	X	X												X	X	X	X																			
Current Living Situation	X	X	X	X	X	X	X	X		X	X	X	X	X	X	X	X	X	X	X	X	X	X	X				X	X	X	X	X	X	X	X	X	
Date of Engagement	X			X						X						X										X			X	X					X		
Bed-Night (Overnight Start/End)		X			X						X					X																				X	
Coordinated Entry Assessment (4)	X	X	X													X	X	X	X	X																X	
Coordinated Entry Event (5)	X	X	X													X	X	X	X																		
Youth Education Status																																					
Last Permanent Address			X															X	X	X																	
Service Transactions	X		X	X		X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X			X	X										
LGBTQ+ Community (Y/N) (8)																																					
Eviction (Y/N) (8)																																					
Fund Source (6)	X	X	X	X		X	X	X		X		X	X	X	X	X	X	X	X	X	X	X			X	X			X	X	X	X	X	X	X	X	
Program/Fund (Provider Standards)	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	
Bed/Unit Inventory (Prov. Standards)	X	X	X	X		X	X	X		X		X	X	X		X	X	X	X			X	X					X	X	X	X	X	X	X	X	X	

- DRF: Set up as a DRF project or used as a fund in a project funded by another fund in your MGA
 - ES: May include "Alternative" Shelters and/or Day Access Centers
 - Currently County of Residence: Required for CoCs with more than one County in the geo-area
 - Coordinated Entry Assessment: May be required if the program is participating in the CoC's CE system
 - Coordinated Entry Event: May be required by the CE project in your area
 - Fund Source: for Direct Services (example: prescription payment assistance, rent payment assistance, gas voucher)
 - CSBG: Education Level is reported for youth ages 14 to 24 and Adults in the CSBG Annual Report.
 - New Element under consideration
 - CSBG does not require HMIS data entry, but highly recommends
- NOTE: If new funds/programs or reporting requirements are added during the biennium then this chart will be updated.
These data are required regardless of which management information is used (example: HMIS, HMIS comparable, other)
Reference: HMIS Data Dictionary

ACRONYMS

BAFI NATO- By and For Initiative, Native American Tribes of Oregon	H TBRA- Home Tenant-Based Rental Assist.
CSBG- Community Services Block Grant	ORE DAP- Oregon Eviction, Diversion, and Prevention
CoC- Continuum of Care	Also EO Eviction Prevention
DRF- Document Recording Fee	PH- Housing with Services (no disability required)
EHA- Emergency Housing Account	PTK- Project Turnkey
EO 23-02 Governor's Executive Order 23-02	RAY - Rent Assistance for Youth
ERA- Elderly Rent Assistance	RRH- Rapid Rehousing
ES- Emergency Shelter	SHAP- State Homeless Assistance Prog.
ESG- Emergency Solutions Grant	SO- Street Outreach
HP- Homeless Prevention	SSO- Supportive Services Only
	TH- Transitional Housing

Reporting

Or as otherwise approved by OHCS, monthly disaggregated data using the SAP Business Objects (the HMIS reporting tool) System Query Report. The report is due 20 days following the end of each month and uploaded into Procorem or a secure file transfer platform established by the Agency or utilize an automated export of disaggregated HMIS participant data. System Query data may be submitted by the HMIS administrator for all OHCS funded HMIS Participating Agencies/Providers in the Oregon Multi-Continuum HMIS instance.

Program Delivery Annual Report

An annual narrative report must be submitted, in form and format required by OHCS, **by the 60th day** following the end of the fiscal year (August 30th) providing detail, including, but not limited to grantee(s) budgets, program services, performance, outcomes, successes, and challenges.

OHCS reserves the right to request other key datasets including the following:

1. Detailed budget and spending reports, especially the breakout of costs spent on clients (financial assistance) and costs spent on program delivery (staffing, subcontracts and related costs).
2. Number of clients served to date, including demographics and other trends as indicated in the HMIS system.
3. Number of requests for assistance to date.
4. Additional guides and assistance with HMIS data entry, data quality and reporting may be found on our website at: <https://www.oregon.gov/ohcs/providers/Pages/index.aspx>

Monitoring

OHCS will conduct a program monitoring of Grantees once every two fiscal years or more frequently at OHCS' discretion. OHCS program monitoring may include desk audit, site visit and/or site visit with grantee(s) (or grantee organization's sub-grantee(s)). Fiscal monitoring will be conducted once every two fiscal years unless circumstances and/or risk assessment require less or more frequent monitoring at OHCS' discretion. Grantees will be notified thirty (30) days in advance of the monitoring visit and informed of what documents and records will be reviewed and any required staff or Board interviews. OHCS will provide Grantees with a written monitoring report inclusive of any findings, concerns, or comments. Grantees are required to submit timely corrective action to findings and failure to do so can result in the withholding of funds or a requirement to return ORE-DAP program funds to OHCS or other remedies as described in the Grantee's grant

agreement/contract.

Grantees must notify and receive approval from OHCS when adding sub-grantee(s) and/or renewing subgrantee(s). Notification and approval normally occur during the Grantee's grant agreement/contract funding application process. However, if changes are made outside of the funding application, Grantees must submit a request to the Housing Retention team Program Analyst for approval of sub-grantee(s) additions, deletions, or modifications within 30 days of such change.

Grantee Monitoring

For the purposes of this operations manual the term "grantee(s)" shall mean any Grantee's subcontractors, contractors, vendor, grantee(s) and any subcontractors, contractors, vendors or grantee(s) of a subcontractor, contractor, vendor or grantee(s). Grantee(s) must follow program intent, rules, and guidelines for the expenditure of funds.

All additions or removals of sub-grantees to ORE-DAP grant programs must be reported to Housing Retention program staff within 30 days of the change.

All grantee(s) must comply with all applicable program rules and regulations as noted in this manual, the Grantee's grant agreement/contract and Program Element: Scope of Work. Records of grantee(s) monitoring performed by the Grantee or sub-grantee(s) will be reviewed during OHCS monitoring. Grantee(s) monitoring reports must be retained by the Grantee and available for review by OHCS or other authorized entity, in compliance with program rules.

At least once during each biennium, Grantee must monitor the activities and expenditures of its grantee(s) to ensure:

- compliance with Grantee's grant agreement/contract and program rules and requirements; and
- achievement of performance goals.

The Grantee's monitoring of its sub-grantee(s) must include:

- an evaluation of each grantee's risk of non-compliance with rules, regulations, and terms and conditions of any applicable subaward for purposes of determining the appropriate level and type of grantee(s) monitoring;
- a review of financial and performance reports;
- a review of grantee(s) policies and procedures, forms, documentation, client records including eligibility, notifications and documentation;
- a review of participant records to ensure compliance with security, maintenance, retention

- and destruction of records; and
- follow-up on all deficiencies pertaining to any OHCS funding in accordance with all program rules and regulations.

Grantees must have a stand-alone policy that identifies the following:

- Frequency of grantee(s) monitoring, which must be minimally once during a biennium or the term of the Grantee's grant agreement/contract;
- The number of relevant samplings of fiscal transactions per program;
- The number of relevant samplings of participant files and that such review includes eligibility, notification and documentation;
- The number of relevant samplings of HMIS entries to ensure appropriate entry and tracking of participant information and service transactions;
- A review of participant records to ensure compliance with security, maintenance, retention, and destruction of records; and
- A review of grantee's policies and procedures, forms, documents and notifications to ensure compliance with all program, state, and federal rules, regulations and requirements.

OHCS retains the right to require modification of any policy that in its determination does not meet basic principles or requirements of such a policy.

Financial Management

Mandatory Use of OPUS

The OPUS database is the system of record for financial transactions with OHCS and use of OPUS is mandatory for fund allocation, draw down, and fiscal reporting processes.

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

Grantee shall, and shall cause and shall require its sub-grantees by contract to comply with the following program specific reporting requirements:

Ensure that data collection and reporting for Housing Retention funded activities be conducted through the use of the OHCS approved OPUS database or other OHCS designated service data information system and assure that data entry into OPUS occurs in an accurate and timely manner.

This program uses the following categories within OPUS:

- Administration (15% Cap)
- Program Delivery-Support Services and Staff
- Program -Financial Assistance
- Outreach and Advertising

OHCS maintains an OPUS Manual and OPUS Help Desk. Staff can be reached at:

- **Email:** opushelp@oregon.gov
- **Phone:** (503) 986-2099
- **Toll Free:** (800) 453-5511, Option 6

Request for Funding Documentation

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

Budget Change Requests and Amendments

Changes in a Grantee's scope of work will necessitate a contract amendment. All budget changes require OHCS approval by submitting a Budget Change Request form electronically to your Housing Retention Program Analyst.

At the discretion of OHCS, additional information may be required for a budget change request.

Request for Funds

Grantee must request reimbursement of grant funds through the OPUS system, at least once every two calendar months. OHCS recommends that best practice is submission of a request at minimum of once every calendar month.

OHCS Spend Down and Reallocation Policy

The following procedures are established for all funds allocated to Grantees through the Grant Agreement process.

Spending Targets

All funds, except for administrative allocations, will be spent proportional to the Expenditure Period at the rate prescribed below (as tracked through the OPUS “Award Summary” report).

Minimum Spending Targets

If you are requesting a deviation from this spend down plan, please justify the change in the time bound expenditure plan section of your implementation report. Please state that you are “requesting an alternative plan, which will look like this:” and communicate the details of the alternative spend down plan.

- At 25% through Expenditure Period, at least 10% of the funding must be spent.
- At 50% through Expenditure Period, at least 25% of the funding must be spent.
- At 75% through Expenditure Period, at least 65% of the funding must be spent.
- At 90% through Expenditure Period, at least 90% of the funding must be spent.

Any spending below these targets will be evaluated against the Time-Bound Expenditure Plan. Any spending below both rates is subject to rescission.

Any spending below the expenditure period targets will be evaluated against the sub-grantees time-bound expenditure plan. Any spending below these stated rates is subject to rescission of grant funds. When spending is below the threshold described, and prior to funding rescissions, OHCS and sub-grantee agree to collaborate to find solutions that resolve the issues.

OHCS may withhold all undisbursed Grant Funds from Sub-grantee if OHCS determines, in its sole discretion, that Sub-grantee has failed to timely satisfy any material obligation arising under the agreement, including providing complete, accurate, and timely reports.

If Grant Funds are not obligated for reimbursement by Sub-grantee in a timely manner. OHCS may reduce Sub-grantee’s Grant Funds and redistribute Grant Funds to other sub-grantees or retain such funds for other OHCS use, within applicable state and federal law.

❖ **Note:** *Some OHCS grants require more aggressive spending requirements. Any such requirements supersede these thresholds.*

OHCS and Grantee Collaboration

When spending is below the thresholds described above, and prior to funding rescission, OHCS and Grantee agree to find solutions that resolve the issues, provided it is within OHCS’ control (in its sole discretion) to adjust to meet Grantee’s needs and does not conflict with federal or state law.

Solutions for resolution may include, but not are limited to:

- OHCS program staff will discuss best practices and training and technical assistance resources to aid in resource utilization. This could include special and discretionary funding allocations to assist with capacity or training needs.
- If OHCS is aware of local political advocacy or engagement, OHCS will work with the Grantee to ensure those parties are involved in planning discussions;
- OHCS staff may contact Grantee to brainstorm and potentially facilitate connections with service providers or provide a list of service organizations and recommended contacts to utilize funding.
- OHCS will provide written notice to cure Grantee and OHCS will allow proposals from Grantee to cure spending issues and prevent funding rescission. Grantee will have 15 calendar days to send the Program Analyst a time-bound expenditure plan for approval to demonstrate how compliance with spending targets will be achieved. OHCS may utilize any available remedies per the grant agreement up to and including rescission of funds and termination of the agreement.

General Fund Grant Allocations

Standard practice for allocation of General Fund for programs is to divide the biennial allocation in two, with 50% allocated in year one, and 50% allocated in year two. Grantee may submit a written request to OHCS to allocate more than 50% in year one which will be reviewed by Housing Retention Program Analysts and determined on a case-by-case basis.

Late Term Rollovers

Grantee can contact an OHCS Program Analyst to update the original Time-Bound Expenditure Plan (adding rollover to the annual allocation) if the rollover is determined within 90 calendar days after the initial Time-Bound Expenditure plan is created. These Implementation Report and spenddown updates will be considered to be the initial Time-Bound Expenditure Plan, as long as an Amended Implementation Report has not already been submitted.

Committed Funds

For grants that include the category of program delivery, Grantees can include these funds as part of the commitments in OPUS; however, the Spend Down Policy and remedies apply only to expended funds as identified in the OPUS “Award Summary” report.

Administration

There is an expectation that administrative funds will be shared with sub-grantee(s) commensurate with the services provided through the program by sub-grantee(s).

- ❖ **Note:** indirect costs are allowed to be applied to the Administration category. Allowable administrative costs typically, but not exclusively, benefit the organization as a whole and cannot be attributed specifically to a particular program. All amounts billed must be supported by actual costs.

Allowable 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, agency audit, agency insurance.
- Board expenses (excluding meals);
- Organization-wide membership fees and dues specific to homeless systems and programs.
- General agency facilities costs (including those associated with executive positions), such as rent, depreciation expenses, and operation and maintenance (as part of the organization's direct or indirect cost allocation plan);
- Equipment rental/purchase, insurance, utilities, and IT costs that are not program specific but relate to the administration of the agency as a whole.
- Indirect costs that are not allocated to direct program activities, including Negotiated Indirect Cost Rate Agreements (NICRA).

Applicable Rules and Regulations

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

- **ORS 456.515 through 456.725 (OHCS)**
 - https://www.oregonlegislature.gov/bills_laws
- **ORS 458.505 through 458.545 (Community Services):**
 - https://www.oregonlegislature.gov/bills_laws
- **OAR 166-300 (Retention Schedule):**
 - <https://secure.sos.state.or.us/oard/ruleSearch.action>
- **OAR 813-005 (General):**
 - <https://secure.sos.state.or.us/oard/ruleSearch.action>
- **HMIS Data Standards Manual:**

- <https://www.hudexchange.info/resource/3824/hmis-datadictionary/>
- **Limited English Proficiency** federal interagency website can be found at:
 - <http://www.lep.gov/>
 - Guidance and additional materials can be found at
 - https://www.hud.gov/program_offices/fair_housing_equal_opp/limited_english_proficiency_0

This manual serves as the guidelines for our ORE-DAP program and is 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.

- **ORS** cited are amended from time to time and can be found at:
 - https://www.oregonlegislature.gov/bills_laws/Pages/ORS.aspx
- **OARs** cited are amended from time to time and can be found at:
 - <https://secure.sos.state.or.us/oard/ruleSearch.action>
- **CFRs** cited are amended from time to time and can be found at:
 - <http://www.ecfr.gov/cgi-bin/text-idx?c=ecfr&tpl=%2Findex.tpl>
- **OMBs** cited are amended from time to time and can be found at:
 - <https://www.whitehouse.gov/omb/information-for-agencies/circular>

Program Definitions

Client: A household who has received an assessment of need, has been entered into an OHCS-funded program (intake), entered in HMIS and receives financial assistance. A client is someone who has developed a client services/housing plan and is not receiving one-time only assistance.

Chronically Homeless: A homeless individual with a disability as defined in section 401(9) of the McKinney-Vento Assistance Act (42 U.S.C. 11360(9)), who: (a) Lives in a place not meant for human habitation, a safe haven, or in an emergency shelter, and has been homeless and living as described for at least 12 months or on at least 4 separate occasions in the last 3 years, as long as the combined occasions equal at least 12 months and each break in homelessness separating the occasions included at least 7 consecutive nights of not living as described; (b) an individual who has been residing in an institutional care facility for less, including jail, substance abuse or mental health treatment facility, hospital, or other similar facility, for fewer than 90 days and met all of the criteria of this definition before entering that facility; or (c) A family with an adult head of household (or, if

there is no adult in the family, a minor head of household) who meets all of the criteria of this definition, including a family whose composition has fluctuated while the head of household has been homeless.

Culturally Responsive Organization:

“Culturally responsive organization” means an entity that, as determined by the Housing and Community Services Department:

- Comprehensively addresses power relationships throughout the organization by methods that include addressing conflicts and dynamics of inclusion and exclusion;
- Has relationships with and is responsive to communities that the organization serves, including communities of color;
- Hires, promotes, trains and supports staff who are culturally and linguistically diverse in ways that reflect the communities that the organization serves, including communities of color;
- Provides culturally responsive service; and
- With respect to paragraphs (a) to (d) of this subsection, has adopted governance structures, policies and cultural norms to hold its leadership and staff accountable and to continue improvements.

Discrimination: The unjust or prejudicial treatment of different categories of people, especially on the grounds of ethnicity, age, sex, gender, or disability.

Domestic Violence: This definition includes domestic violence, dating violence, sexual assault, stalking, attempting to cause, or intentionally, knowingly, or recklessly causing or placing another in fear of imminent serious physical injury or emotional, mental or verbal abuse, and using coercive or controlling behavior. This does not include other criminal acts such as violence perpetrated by a stranger, neighbor, acquaintance, or friend, unless those persons are family members, intimate partners, or household members. (Note: This definition aligns with TANF rules and regulations)

Eviction: The court-ordered removal of a tenant from the property where they reside. A landlord may decide to evict a tenant for nonpayment of rent, damages, illegal activity, violating the terms of a lease, or if the landlord wishes to take possession of the property.

Eviction court: A court that hears cases that seek evictions from real estate premises.

Eviction Prevention: Strategies and programs designed to keep individuals and households in their homes, helping them to avoid the risk of homelessness. Eviction prevention is often seen as an “upstream” solution to keep individuals and households stably housed, to avoid them falling into unsafe housing conditions, and to avert the damaging impacts on mental and physical health,

economic wellbeing, and access to future housing options that often come with evictions on record. These strategies intervene and provide support at different points in the eviction process – before an eviction is filed with the courts, during an eviction proceeding, and after an eviction judgment is given. The goal is to address the roots causes of evictions with interventions at different stages in the eviction process, tailored to meet a range of needs and circumstances.

Grantee(s): Entities that, by contract with the Grantee agency, provide assistance payments/services and may receive funding directly from the Grantee agency. Through its agreements with Grantee agency, Grantee(s) must comply with all requirements for the program. Grantee(s) include a Grantee's subcontractors, contractors, vendor, grantee(s)s and any subcontractors, contractors, vendors or grantee(s) of a subcontractor, contractor, vendor, or grantee(s).

HMIS: Homeless Management Information System. Victim Service Providers must use an HMIS Comparable Database.

Housing First: An approach to connect individuals and families experiencing homelessness quickly and successfully to permanent housing without preconditions and barriers to entry, such as sobriety, treatment, or service participation requirements.

Housing Termination or Termination of tenancy: The first step in the eviction process and is often used interchangeably with the term eviction. When terminating tenancy, the owner gives the tenant notice to vacate the unit because of a lease violation(s)

Illegal Retaliation by a Landlord: It is harassment, intimidation or the taking of adverse action against a tenant. Some examples may include increasing rent, decreasing services, serving an eviction notice, threatening eviction, or filing an eviction case.

Just Cause/No Cause, Just Cause: is a legally sufficient reason. Just cause is sometimes referred to as good cause, lawful cause, or sufficient cause. A litigant must often prove to a court that just cause exists and therefore the requested action or ruling should be granted.

The phrase "no cause" can have different meanings depending on the context. Here are some examples:

- To not have a clear, legitimate reason to do something.
- A landlord can use a "no cause" notice when there is no lease agreement or when the rental agreement between the landlord and tenant does not establish a definite term.
- Not able to be shown to be right or reasonable. Without any grounds to support it.

Landlord: A person who rents land, a building, or an apartment to a tenant. In a lease contract, the

landlord transfers part of his or her interest to the tenant, allowing the tenant to occupy and use the property. The landlord can limit the tenant's use of the property or require the tenant to do something in the lease contract. However, once the lease is signed, right of entry to the property by the landlord is regulated.

McKinney Vento definition of homelessness: the term "homeless children and youths": means individuals who lack a fixed, regular, and adequate nighttime residence (within the meaning of 42 U.S.C. 11302(a)(1); and includes:

- a. children and youths who are sharing the housing of other persons due to loss of housing, economic hardship, or a similar reason; are living in motels, hotels, trailer parks, or camping grounds due to the lack of alternative adequate accommodations; are living in emergency or transitional shelters; or are abandoned in hospitals;
- b. children and youths who have a primary nighttime residence that is a public or private place not designed for or ordinarily used as a regular sleeping accommodation for human beings (within the meaning of section 42 U.S.C. 11302(a); children and youths who are living in cars, parks, public spaces, abandoned buildings, substandard housing, bus or train stations, or similar settings; and migratory children (as such term is defined in section 1309 of the Elementary and Secondary Education Act of 1965) who qualify as homeless for the purposes of this subtitle because the children are living in circumstances described in clauses (a) through (c).

Mediation: "A process in which a mediator assists and facilitates two or more parties to a controversy in reaching a mutually acceptable resolution of the controversy. Includes all contacts between a mediator and any party or agent of a party, until such time as a resolution is agreed to by the parties or the mediation process is terminated." ORS 36.110[5]).

Occupancy/Lease/Rental Agreements: They are used for temporary or permanent housing, which includes Transitional Housing. Occupancy/Lease/Rental Agreements are not the same as a Code of Conduct Agreement.

Participant: A household who may or may not be a client but is receiving OHCS-funded services.
Priority Population: Persons that the Grantee/grantee(s) has determined as having the greatest need and will receive services first (such as veterans and homeless families with children). (For example, for the purposes of HSP, TANF participants are a priority as required by the federal funds.)

Rent cap: A term that can have two different meanings. One meaning is the maximum amount of rent a landlord is allowed to charge a tenant, also known as 'rent ceiling'. This is a way of regulating the rental market and protecting tenants from excessive rent increases. Another meaning is the limit on the number or percentage of units that may be rented at any one time in a community. This is a way of maintaining the balance between owners and renters in a community.

Target Population: Persons a Grantee/grantee(s) wishes to reach out to who are under- represented in their service population, but delivery of funds cannot be limited to only the target population.

Tenant: A person or entity who temporarily occupies or possesses real estate that belongs to a landlord.

Veteran:

- Served on active duty with the Armed Forces of the United States:
- For a period of more than 90 consecutive days beginning on or before January 31, 1955, and was discharged or released under honorable conditions;
- For a period of more than 178 consecutive days beginning after January 31, 1955, and was discharged or released from active duty under honorable conditions;
- For 178 days or less and was discharged or released from active duty under honorable conditions because of a service-connected disability;
- For 178 days or less and was discharged or released from active duty under honorable conditions and has a disability rating from the United States Department of Veterans Affairs; or
- For at least one day in a combat zone and was discharged or released from active duty under honorable conditions;
- Received a combat or campaign ribbon or an expeditionary medal for service in the Armed Forces of the United States and was discharged or released from active duty under honorable conditions; or
- Is receiving a nonservice-connected pension from the United States Department of Veterans Affairs.

OREGON HOUSING AND COMMUNITY SERVICES

Oregon Eviction Diversion and Prevention Program (ORE-DAP) Rules Advisory Committee (RAC)



Shauna Williams, Eviction Prevention Program Analyst

Shauna.WILLIAMS@hcs.oregon.gov

May 19, 2025

Process Agreement

Seek common ground and understand divergence

- Practice “Yes, and” to build on ideas.
- Be clear and productive when you share differing experiences and opinions.

Share airtime

- Practice WAIT: Ask yourself, “Why am I talking?” Or “Why aren’t I talking?”

Active virtual participation

- Make sure your Teams name is accurate
- Keep your video on
- Use chat and Q&A functions
- Raise your hand
- Respond to polls
- Minimize multi-tasking

Take care of yourself



Active Virtual Participation and Zoom Logistics

Audio

- Please keep yourself muted when not talking
- Unmute yourself when called on or during open discussion

Chat

- Use chat to ask questions in real time

Raise hands

- During discussion, use the raise hand feature to signal that you have something to say



Talking head icon

- This prompt will show when we most want your feedback



Introductions



1. Name
2. Organization
3. What connections do you have to ORE-DAP?
4. Are you more of a rule follower or a rule breaker?



What We'll Be Covering Today



OHCS overview



What is rulemaking and why does it matter?



Proposed rules review



Draft impact statements discussion

ORE-DAP RAC, May 19, 2025



How OHCS Works



Working together to serve individuals,
families, and communities throughout Oregon

ORE-DAP RAC, May 19, 2025



Helping Oregonians Across the Housing Continuum

Housing
Stabilization



Affordable Rental
Housing



Homeownership



Disaster Recovery
and Resilience



Equity and Racial Justice

ORE-DAP RAC, May 19, 2025





What is Rulemaking?

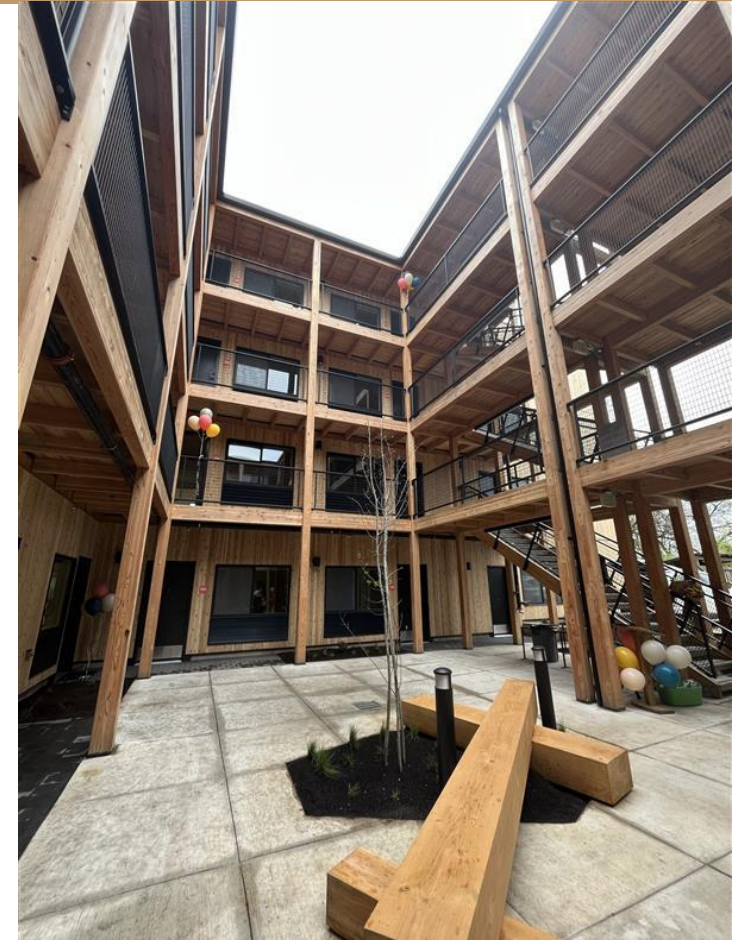
Rules Put Laws Into Action

- Rules allow agencies to take laws passed by the Legislature and put them into effect.
- Laws cover the outline of how a program or policy works. Rules are the details that make that vision a reality.
- Rules must fit within the scope of the law.
- Administrative rules carry the force of law.
- Rules can be changed more easily than laws can be. This system allows a law to be in effect for years but still keep pace with the changing times.



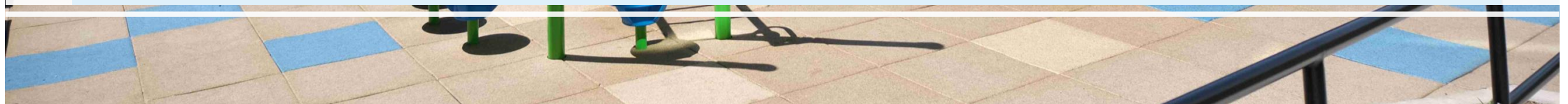
What is Your Role Here Today?

- You have been invited to represent the interests of people who would likely be affected by this rule.
- We intentionally chose this group based on your lived experience, industry expertise, or community lens.
- Your recommendations will be presented to our executive leadership with the final rule draft and filed with the secretary of state.





ORE-DAP Rules



Proposed Rule Text – OAR 813-261

Adoption of:

- Program Guidance, referenced in 813-261-0020; will be dated TBD 2025 (updated from Feb. 2024).
 - Intent of Program Guidance update is to combine three existing manuals into one.
 - No changes to program requirements and standards.
- Definitions, Administration, Use of Funds, Remedies, Challenge of Grantee Action, and Administrative Review by Subgrantee.



Are there any questions or areas we can clarify further?



Draft Fiscal Impact Statement

The adoption of ORE-DAP rules may have positive fiscal impacts on local governments, nonprofit grantees, and the public. The rules authorize use of state General Funds to: prevent evictions and homelessness; support interventions like rental assistance, legal mediation, and wraparound services. The extent of the impact is positive for public agencies and local partners by reducing downstream costs associated with emergency shelter, public health interventions, and rehousing services.



Does this drafted statement align with your perspectives and views as an impacted community member?



Draft Small Business Impact Statement

1. ORE-DAP rules do not directly regulate small businesses, but potential indirect interaction exists with small property management firms or landlords, legal service contractors and nonprofit community partners, and mediation providers. The estimate would be less than 100.
2. No significant adverse impact on small businesses is anticipated. The rules do not regulate business operations nor require expenditure from small businesses. To the extent that landlords (often small business owners) interact with the eviction system, the program may benefit them indirectly. Helping tenants remain stably housed ensures that landlords keep receiving rent payments and reduces their eviction-related turnover costs that non-payment evictions cause.



Do these drafted statements align with your perspectives and views as an impacted community member?



Draft Cost of Compliance Statement

1. Compliance with the rules may require labor such as staffing for data entry, case management, and fiscal tracking, supplies such as secure file storage, computers, internet access, and Homeless Management Information System (HMIS)-compatible systems, and administration such as training, privacy notifications, and financial documentation. These are allowable expenses under ORE-DAP program guidance, with defined spending thresholds for administration and capacity building.
2. Grantees must engage in quarterly and annual reporting on expenditures and program outcomes, data entry into HMIS including timeliness standards, and budget change requests and fiscal tracking through OPUS. Administrative burden is typical of publicly funded grant programs and is eligible for reimbursement through administrative funds provided in the grant award.



Do these drafted statements align with your perspectives and views as an impacted community member?



Draft Racial Equity Impact Statement

The ORE-DAP rules prioritize partnerships with culturally responsive organizations and targeted outreach to historically marginalized groups, including Black, Indigenous, Latinx, and other communities of color, as well as veterans, persons with disabilities, and farmworkers. These rules positively affect racial equity by requiring culturally responsive service delivery, intentional referral networks across social service and legal sectors, and prioritization of underserved households at imminent risk of eviction. This supports the Oregon Statewide Housing Plan's equity goals and ensures housing stability interventions are delivered equitably across demographics.



Does this drafted statement align with your perspectives and views as an impacted community member?



What We Heard From You Today

- Fiscal impact
 - Appreciate the downstream costs being included
- Small business impact
 - “It is 100% true. Keeping tenants stabilized is more cost effective.”
 - It costs more to the community and to individuals involved to provide support post-eviction
 - Eviction prevention also helps keep them in their communities, so their social supports stay intact.
 - The estimate of 100 small businesses being impacted seems low. 500 might be better.
- Cost of compliance statement
 - Line for administrative cost is great
 - “case management” – what is the expectation of the services provided to the household for that?
 - Further definition or examples would be beneficial
 - “Participant services” was suggested as an alternative
- Racial equity impact
 - More explanation needed of what “requiring culturally responsive service delivery” means
 - Appreciation for this lens



What We Heard From You Today

Parking Lot Items

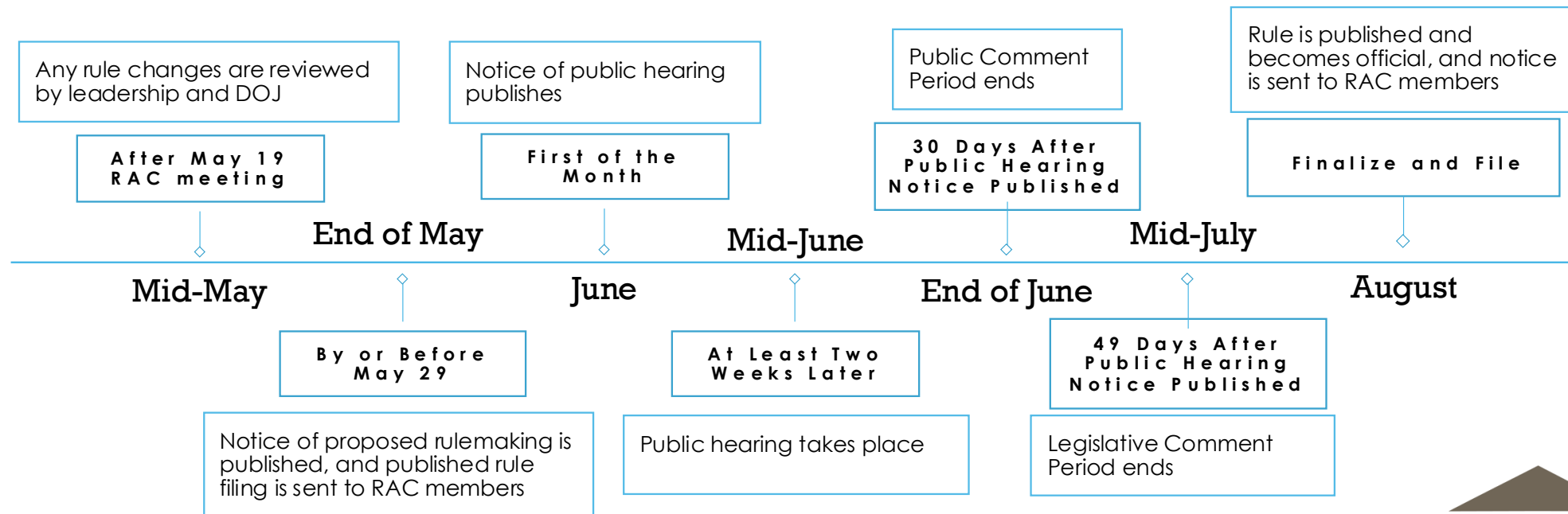
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Unanswered Questions/ Follow Up Required

- Look into a more accurate count of small businesses impacted
- Reconsider using the term “case management” since it’s so broad



Next Steps and Estimated Timeline



Note: Dates will be pushed back if drafting, review or public comment period takes longer than anticipated.

ORE-DAP RAC, May 19th, 2025





Thank You!

Shauna Williams

Shauna.WILLIAMS@hcs.oregon.gov



ORE-DAP RAC, May 19, 2025

Transcript

May 19, 2025, 9:29PM

DH **DAVIS Jaci * HCS** 0:11

All right. I think we are good, Shauna.

WH **WILLIAMS Shauna * HCS** 0:15

Go ahead and get started.

Good afternoon, everybody. Happy Monday.

Happy May 19th.

Thank you so much for joining us.

My name is Shauna Williams.

I'm a program analyst here for ORE-DAP at OHCS.

You will hear the least from me today, but I wanted to make sure you saw my face because you'll be sending questions and emails to me a lot. So the communication will be a lot of the times with me. But all the information you hear today will be from our team, who are lovely.

And I will go ahead and get started.

Pass this over to Jaci so she can kind of talk to us a little bit more about what we're getting into today.

DH **DAVIS Jaci * HCS** 0:53

Outstanding. Thank you, Shauna.

My name is Jaci Davis and I use she/her pronouns.

I am the agency's lead administrative rule coordinator here, and I'm happy to be with you all in virtual attendance as we continue to work through our new virtual space here in Team Webinar.

We want to make sure that we're really grounded here in what our intended purpose and goals are. So we're hoping that all of us here are able to really lean in and agree in these process agreements with us today. Everyone deserves to be heard, and everyone has their piece of truth.

So seeking common ground and understanding divergences are understanding where we might be seeing and hearing different perspectives and respecting that.

You know, challenge yourself to engage in new ways that honor your voice, the voices that you do know, and also be in a thinking space about what we're going to be able to learn from each other here today.

You know, we would like to have active participation within--it's not Zoom today, but it is Teams webinar that we're going to be in today. We will ask that our RAC members keep your video on as much as you feel comfortable.

We will be recording and transcribing today's meeting for record-keeping purposes and summarizing them later on in our reports.

We have a raise-hand and also a chat box.

For all of us in virtual attendance that are not RAC members, you will have the Q&A function if you have any chat or other questions that you have about our process, about what the material is. Feel free to bring those into the Q&A box as well.

We ask that everyone respect each topic and each other, and to make the most of our time today to please practice some active virtual participation. That includes listening and participating.

We strive to facilitate a highly effective rules advisory committee with you all today, but we only have this hour and a half, so we want to make sure that we are intentional on the goals that we're trying to accomplish today.

And I trust that all of our rules advisory committee ahead of today's meeting received the materials.

And all of us in virtual attendance and on the record: they are also posted on the OHCS rules website. You can find them under the OR, ORC materials right next to the invitation to register for today's meeting.

Now, before I move forward, I want to make sure that if there's any questions or objections or additions to today's process agreements to really keep us grounded in what we're trying to accomplish today, is there any edits or, or comments that folks have?

Team, I'm not seeing any; are you?

OK.

Great. I'll keep on going then.

Today, I mentioned we are going to be in Team webinar space.

This is relatively new for our agency, so please give us some grace.

We will be having our audios on from—periodically.

In times if you are not actively engaged in providing comments and feedback, we do ask that you remain on mute to avoid unnecessary background noise.

Like I mentioned, we have our chat box available for links and questions and responses from our RAC members.

You can also raise your hand even as attendees if you have questions and things, we can elevate your unmute function throughout today's presentation. You'll also see this little blue chat box head and that really is to help indicate when we are really hoping to have your feedback incorporated, so when you see that blue box, that means we're going to be asking for your feedback around those questions and slides.

And we are going to be, like Shauna mentioned earlier, we're going to be kind of like, you know, tossing our facilitation hat around a bit to kind of keep you all engaged, hopefully, and also spread the information of how many team members are really supporting our ORE-DAP program.

And I will turn it over to my colleague Kaellen for her introduction slides.

H HESSEL-OWENS Kaellen N * HCS 5:19

Hey everyone, we are going to start off by doing a round of introductions with the OHCS staff who are staffing this RAC.

There are some others who are just in attendance, and you all don't have to speak. And then also our RAC members.

So we'd like you to go around and say your name, the organization you're part of, how are you connected to ORE-DAP, and then are you more of a rule-follower or a rule-breaker?

I will start by saying my name is Kaellen Hessel-Owens.

I use she/her pronouns, and I am a community engagement specialist here at Oregon Housing and Community Services. One of the many programs that I help support is ORE-DAP, so that is what I am doing here.

And historically, I have been a rule follower, but I'm entering, like, my rule-breaker era, so that has been quite an interesting transition that, if you really want to know detail, we can talk about later.

It's keeping things amusing and, you know, fun, I guess.

Who would like to go next?

How about Rachel?

BH BENNETT Rachel * HCS 6:32

Sure thing.

Hello, everyone.

My name is Rachel Bennett.

I use she/her pronouns, and I am the rules—divisional rules coordinator for the Housing Stabilization Division for OHCS, and so I'm here to support our rules writers with the ORE-DAP program, moving it through the rules process.

I am unequivocally a rule-follower.

I really tried to think of an example where that might not apply, and I just I could not come up with one, so I have to just accept it.

So, and that's OK, then; I'm well suited for this job.

I will pass it to Jaci if she'd like give more info than she already has.

DH **DAVIS Jaci * HCS** 7:13

Absolutely. Thanks, Rachel.

Again, y'all, good to be with you all in virtual attendance.

My name is Jaci Davis.

I use she/her pronouns.

I am the agency's rule coordinator, agency's lead rule coordinator, so I really lead our, our team and support Rachel and the other rule coordinators here at the agency.

I would say that I have a large connection to many of the agency's programs throughout our, our biennium, and I look forward to supporting our duplicitivity and with more detail.

Now, am I more of a rule-follower or a rule-breaker?

Like, some folks look and think I'm a rule-breaker—I am not.

I am absolutely, like, I am a rule-follower.

I, I like to stay in where my lane is.

This is my comfort level.

I'm not much of a rule-breaker, I don't know.

Shauna, what about you?

WH **WILLIAMS Shauna * HCS** 8:03

My name is Shauna Williams again.

I'm the eviction prevention program analyst on ORE-DAP here at OHCS.

My pronouns are she/her, and I am a rule-follower for the most part.

My anxiety and overthinking will not allow me to dive into the rule-breaking; the consequences are too real.

So, I've seen those "locked up abroad" shows and have no interest in that at all.
So, it's easy for me just to follow the rules, know what I'm doing.
And I think that's everyone on our team, right?
And so we'll be jumping over to the RAC members.
So, I get the pleasure of picking someone to introduce themselves.
So, Stacie, do you want to go first?

SS Stacie Sabourin 8:45

Hello, everyone.
My name is Stacie Sabourin.
I'm from Mid-Columbia Community Action Council, and my current job title is care quality and compliance coordinator, which obviously means that I am a rule-follower.
I like black and white, and I do not care for gray at all.
But yeah, thank you very much.

H HESSEL-OWENS Kaellen N * HCS 9:15

So that just leaves Marisa.

MB Marisa Ball 9:21

Hi, I'm Marisa Ball.
I am the compliance manager for the Marion County Housing Authority.
Am I a rule breaker, a rule follower?
I am quite the follower because I'm the compliance manager, but as we know, our clients' lives are a little messy, so sometimes, sometimes we have to look at that gray area.
So I, we, we do follow the rules, but there is a lot of gray area.

H HESSEL-OWENS Kaellen N * HCS 9:50

That's great, thank you.
And I missed Breezy. Can you go next?

BP Breezy Poynor 9:56

Yeah. Hello. My name is Breezy.
I'm the CPO of supportive housing for Mid-Willamette Valley Community Action Agency, and I am not really a rule-follower or rule-breaker.

Sure. I'm more of a "ask for forgiveness" kind of person.
So, just kind of whatever suits me in the moment.
So, yeah, thank you.

H HESSEL-OWENS Kaellen N * HCS 10:19

All right, well, I appreciate all of you playing along with me.
The purpose of that is to get you thinking differently. Oftentimes, when you hear about a RAC, if this is something you have been a part of before, they're often really dry and technical and very, like, legal-ese, and they're not always the most fun and colorful, but we want you to be thinking out-of-the-box or trying to make this more engaging.
Just more of a dialogue, as well.
So, we're also gonna have different poll questions throughout, one of which can be launched now.
Basically wondering, you know, have you been on a RAC?
Have you assisted us in filing with our rules before?
And this will be another one of the mechanisms that we use to collect feedback from you all going through this process.
We are ready for the next slide.

DH DAVIS Jaci * HCS 11:34

All right. I was just getting those poll responses brought in.
I'm not sure if folks can see this.
So far we have 18 responses: 11% said yes, they had served on a Rules Advisory committee prior, but 89 of us folks are, are brand new to a RAC.
So, welcome.
I also wanted to quickly mention the responses to the second question in our poll.
Have you ever assisted OHS in rule-making and rule-filing in the past?
20% of you had said yes, so thank you for returning.
And hopefully this was a really helpful and engaging process for you all. Like Kaellen was talking, Kaellen was talking about.
In 83% of you all, it's brand new, so welcome to our rules advisory committee spaces.
Thanks, Kaellen.
I'll go ahead and move forward.

H **HESSEL-OWENS Kaellen N * HCS** 12:21

Thank you, Jaci.

We actually cannot see those results, so we're gonna need you to read those out each time.

DH **DAVIS Jaci * HCS** 12:26

Good to know.

H **HESSEL-OWENS Kaellen N * HCS** 12:26

But yeah, welcome, everyone, to what is going to be the best RAC ever, but a little bit about what we will be covering today.

First, we're going to do an overview about what OHCS is for, just in case anyone is new to our agency.

Then we're going to explain what rulemaking is and why it matters.

Then we're actually going to start diving into the meat of what we're here to talk about.

We're going to do a review of the rules that we were proposing and then have a discussion on our draft impact statements.

So the main thing that we are here to get feedback on is our draft impact statements, so that's where we'll be spending the bulk of our discussion today, but if you have other feedback, please feel free to put in the chat, let us know.

Next slide.

So, Oregon Housing and Community Services is our state's.... I know this, Jaci, that.... just blanked on the acronym and what it stands for, which is really great, but.... Housing finance authority.

DH **DAVIS Jaci * HCS** 13:34

Housing finance agency.

H **HESSEL-OWENS Kaellen N * HCS** 13:37

So close.

Sorry, everyone.

We are the state's housing finance agency, which means we get money from the federal government and we pass it along to help build affordable housing

complexes.

We also get other federal funds, state funds, local funds, to do a variety of other programs.

Really, the heart of what we do has historically been trying to develop affordable housing.

So we are a pass-through agency, which means that we do not directly provide any services.

If you're used to working with someone like DHS, you know, you need SNAP, you need some other benefit, you go to them, you fill out a form, and they can help you receive that.

We don't do that.

We get the money, and then we partner with grantees on different contracts and fund the good work that they then go out and do throughout the community.

So, we fund many different things, but oftentimes the people who are receiving help from us don't always realize that they're receiving help from us.

They'll know, like, "Oh, I went to my local community action agency, and they help me do this stuff."

It's like, "Yes, wonderful, we want you to have those relationships, but for some of those things, we provide that funding."

But really, we're all working together to try and serve individuals, families, communities throughout Oregon.

Next slide.

And we do that work and all throughout the housing continuum.

So, we have housing stabilization, which is really our programs for those who are currently experiencing homelessness or housing instability. So, that could be people who are at risk of eviction. Maybe they've already received a notice or they know that they're, you know, one paycheck away from not being able to pay their bills.

So, we have programs from them, and that is where this ORE-DAP program is housed.

And those services mostly apply to those most in need, the lowest-income folks throughout our state.

Then we have affordable rental housing, which are the people who help get affordable housing built through, all over the state.

Then we have homeownership, which funds different housing developments that end up being, you know, like, instead of it being a complex, it'll be more like a subdivision.

Like, Habitat for Humanity is one of our partners, and so then they'll help a lower income family be able to access homeownership, and they'll also provide services like down payment assistance, homeownership counseling, foreclosure avoidance.

And then finally our newest division is disaster recovery and resilience.

This was set up after the devastating wildfires on Labor Day of 2020.

So, this is federally funded to help those communities try and recover, to get back to where they were before.

And throughout everything we do, we are trying to look at things with an equity and racial justice lens.

We know that, historically, government has not been great about actually trying to provide services for everyone, and we see our mission as being called to serve all Oregonians, and that includes the communities that have historically been underserved or marginalized and those who might need a little more intention or effort to reach out to.

Like, that also includes rural communities, but we're trying to make sure that everyone who could benefit from one of our programs is able to access it.

So, that's something that's just very important to what we do in all of the ways that we do it now.

Curious, people who are here.

Next poll question: which parts of OHCS do you work with?

Like, we know that you're probably interested in housing stabilization if you are here for this ORE-DAP RAC; if you're not, you might be in the wrong meeting.

I'm curious if you have worked with any of our other divisions as well.

DH **DAVIS Jaci * HCS** 18:02

Kaellen, the votes are coming in.

We've got about 18, 19.

The numbers are coming through.

See if we can get over 25 folks to respond to this question.

H **HESSEL-OWENS Kaellen N * HCS** 18:12

I just noticed that.

Oh wow, it keeps changing.

Oh, I see it.

It's in the chat.

I don't know if everyone can see it or, for instance, but we have 40 attendees, so this is really great.

DH **DAVIS Jaci * HCS** 18:17
OK.

H **HESSEL-OWENS Kaellen N * HCS** 18:22
And yeah, we can get closer to 40 on there, but.

DH **DAVIS Jaci * HCS** 18:26
Housing stabilization, 25. There you go.

H **HESSEL-OWENS Kaellen N * HCS** 18:28
Looks.

DH **DAVIS Jaci * HCS** 18:30
I'll go ahead and close this poll at this time, but it looks like majority of the folks in attendance have really engaged around our housing stabilization division.

H **HESSEL-OWENS Kaellen N * HCS** 18:42
OK.
Great. Thank you for sharing, Jaci.
It's over to you.

DH **DAVIS Jaci * HCS** 18:47
All right, y'all.
Again, I will kind of orientate you all.
I think that it's known, executive branch agencies go through administrative rules, and we file these rules for a number of reasons.
And so I just want to quickly orientate you all on how folks are able to engage in our rulemaking process and really orientate you RAC members on your role here.
My daughter's leaving for work.

Don't mind that.

So again, our administrative laws are our main mechanism here and within the executive branch agency.

It's how we're able to clarify everything that happens within the legislature and federal government that comes to us here at the housing finance agency like Kaellen explained.

A lot of us are delivering services and resources to so many community partners, community action agencies and other nonprofits and philanthropy, also local governments and our tribal neighbor, neighbors and many other impacted folks. We invited you all here today because we believe that you are representative of a impacted community that could be involved in our programs, and we really need to lean on your expertise to not only ensure and that we are, are creating clear and consistent rules that you're able to understand but that we have an understanding of what that fiscal and economic impact is going to be to be with from your community lens, from your expertise here.

And it's because our administrative rules will hold the same weight as law when they are filed in accordance with the Administrative Procedures Act, or the APA, that hold that same legal weight, so we want to make sure any changes that we're making and our public policy designs are aligned with you all and that we are very transparent about any and all impacts.

Again, I will really, like, to ensure that all of our RAC members specifically understand that, while we are always looking for feedback, especially when you have feedback that we can incorporate to mitigate negative impact, we will be spending a large majority of our time today to review our fiscal and economic impact statements to make sure that those are reported when we go to file next month, hopefully, for the June Bulletin.

And it is because of those recommendations we're going to make sure that everyone has that equal time and space.

We will have some additional poll questions at the end and different dialogue, but we welcome you to also come off of mute at any point, especially if you have feedback to provide around our fiscal impact statements.

I'm going to turn it back over to Shauna.

She's going to explain a little bit more about the background of ORE-DAP and how we got to this place of publishing our administrative rules.

WH WILLIAMS Shauna * HCS 21:42

Thank you, Jaci.

So, some of you've already worked within ORE-DAP, but I want to give a little bit of history, like Jaci mentioned.

So, back in 2021, there was a special session for the Oregon Legislature.

I struggled with that word for some reason.

And they allocated funding to OHCS for, for low-income Oregonians who are at risk or facing homelessness or risk of eviction or facing homelessness.

The funding allowed the grantees to help households facing instability, providing a range of eviction services.

So, many of the CAAs or the CROs that we worked with were able to provide supportive services such as rent assistance, utility assistance, or other services to help, help keep households in their homes.

So, in the past four years, over \$100 million has been allocated for these services between the CAAs (community action agencies) and CROs (the culturally responsive organizations), and this model has allowed OHCS to ensure funding reaches communities across the state and those who have been historically underserved by the agency.

So, as ORE-DAP has kind of moved from kind of that time of pandemic and chaos and not exactly sure what was going on, we're now moving into a space where it's matured, and it's time that the program establishes a firmer framework to ensure guidance is applied consistently, which is why we're establishing permanent rules at this time.

So, if anyone has questions about that, I'm happy to talk about it a little bit further, but we just wanted to kind of do a basic overview of the history and why we're choosing now to step into the permanent rules area.

And if no one has anything, I will throw it back to Rachel.

BH BENNETT Rachel * HCS 23:30

Thank you, Shauna.

So, one of the things that we're doing as part of this RAC process is, last week, we had sent to the RAC participants our draft rules, and hopefully you've had an opportunity to look through them.

The goal of this process right now was to take our existing program guidance, which

actually consisted of three manuals, and make it one, which would be easier for, hopefully, all our grantees to interact with and understand.

But in addition to the program guidance consolidation, which did not change how you're going to implement the program, we're also drafting these rules to formally codify the program.

We—the intent of the rules draft, of having you take a look at that if you can, is just to get a sense of what we intend to present, to file with the Secretary of State.

Some of it looks pretty probably familiar for anybody working with administrative rules on any kind of regular basis.

Got some definitions that are not already found in our general definitions of things that maybe are specific to ORE-DAP or that we want to highlight for use in this program's rules sections.

There's a section incorporating the program guidance into rule, which will then link to the program guide.

That, in the draft rule, there's an effective date of February 2024, which I believe was the last program guidance effective date prior to this consolidation and update, so that will change once we get this filed, finally filed, in its final form.

That's a better way to say that.

There's a section of rules about administration of the program, how funds are allocated.

There is a section of rules about the use of funds.

There was a decision made to not spell out every eligible use for the ORE-DAP funds; instead, we're asking folks to refer to the program guide that can give more specific examples of eligible uses of funds.

There is a rule section for remedies, and that will outline what OHCS's options are in the event that there's deficiencies in program implementation or funding use on the part of grantees.

There's also notice requirements for what OHCS has to do in the event that it intends to take any action.

There is a rule section on the challenge of grantee action, so households that feel the funds were not administered to their liking, they can challenge that.

And it outlines the process by which that's done.

And also administrative review by a subgrantee in the process for obtaining such a review.

None of these rules changes, to my understanding, are changing what the existing

understanding of the admin, program administration is.

The process that we're engaging in, again, is really to consolidate those manuals and then formally have some rules on the books because, currently, ORE-DAP does not have any rules on the books in the OAR.

So, that's a real, real high-level overview of the rules that we have drafted and that are for your consideration.

Is there anything specific or generally that you'd like to ask about, give feedback about related to the draft rules?

And I do see in the chat, for those who are not RAC participants: no, you have not seen the draft rules, but I believe all the RAC materials that we have presented to the participants here today are also available on the website, which I believe Jaci linked above.

And you do have an opportunity—I realize it's a lot of material to digest, between the program guidance and the proposed rules and our impact statements, etc.

You have time to give us feedback on these materials beyond just this meeting space, so take some time to digest, really look through it and feel free to e-mail us.

And, and all those comments will be registered and folded into our report at the end of this process and also reviewed by our program staff and rules writers to evaluate.

So.

But I will take a pause for any questions or feedback on the rules generally.

Nothing in the chat, no hands. I believe we have a third poll question.

Do we want to launch that now?

DH **DAVIS Jaci * HCS** 28:28

I think the question at the bottom the chat head is exactly the same poll question here.

So RAC members, if there's any place that we can help clarify, if there's any place of the drafted rules that you would like to provide feedback on, this is a good time to do that it, because we'll move into our impact statements next.

BH **BENNETT Rachel * HCS** 28:32

OK.

DH **DAVIS Jaci * HCS** 28:49

I'm not seeing any, team. Are you?

Oh, and to your comment, Kevin, that is correct.

Our rules advisory committee space today does not host a public comment period on the agenda, but in June we will be hosting a rules public hearing, and that is dedicated to all of the public comments that you all have.

So, feel free to, you could either send them forward to us through our, contacting us in different, any of our staff information here that you have available from our attendance today or on our website, or you can always join that public hearing space next month for the ORE-DAP public hearing, and you can provide your comments then, too. Thanks.

BH **BENNETT Rachel * HCS** 29:36

And there will be a slide later in this presentation that kind of outlines our next steps for this rules making process.

That will kind of show where we go after the RAC when the public hearing is noticed and how you can get information about the public hearing, so hang out for the rest of the RAC, and we'll definitely get to that information, because we do want folks to get involved beyond just our RAC participants.

But it is kind of a focused space today.

There are no other questions or any questions at this time.

I will hand it back to Jaci.

DH **DAVIS Jaci * HCS** 30:11

Thanks, Rachel.

I'm not seeing much, so the next few slides that we'll see really detail the core of our rulemaking process and why we're convening a RAC today.

We need to ensure with what we're trying to adopt here today in administrative rules, do we understand the impacts that it has for all of you.

Are we correctly reporting what you all see in your communities and within the lens, as well, as RAC members here?

So, I'm just gonna let the draft impact statement right on our screen to sit here for a second.

Because we do report on positive and negative impacts, we want to ensure this is encompassing to all of our RAC members.

OK.

I am going to go ahead and take an opportunity to read the fiscal impact statement

as drafted, just for those that might have visual impairment that are in virtual attendance for us today.

The adoption of the ORE-DAP rules may have positive physical impact on local government, nonprofits, grantees, and the public. The rules authorize the use of state general funds to prevent evictions and homelessness, support interventions like rental assistance, legal mitigation, and wraparound services. The extent of this impact is positive for the public agencies and local partners by reducing downstream costs associated to emergency shelters, public health interventions, and other rehousing services.

Are there any other points of feedback or comments that we should be including in our drafted fiscal economic impact statement?

I'm looking at my RAC members right now.

Does there, are there any concerns with what is listed?

Any, any additions that we need to have?

BP Breezy Poynor 32:34

No, I think it covers everything. I mean, with what we're seeing kind of in our communities, it really does kind of cover with the benefits of it. And then what we can expect, you know, downstream, I do like that it has, you know, that downstream piece of it.

So, it seems pretty comprehensive to me.

DH DAVIS Jaci * HCS 32:55

Thanks, Breezy.

SS Stacie Sabourin 32:59

I really like that it talks about wraparound care and services, 'cause that's really important.

DH DAVIS Jaci * HCS 33:05

It's such a combined effort there.

Thanks, Stacie. Appreciate that.

Marisa, is it looking good to you, too?

MB Marisa Ball 33:23

Yeah, looks great.

Yeah, this is, it's perfect.

DH **DAVIS Jaci * HCS** 33:28

Outstanding.

OK. We will keep that drafted fiscal impact statement as is.

Again, we will be listing all of these statements on our notice of proposed rulemaking we're going to have that ready for our June bulletin, so look out for that announcement.

Let's move on to the next drafted impact statement.

The next one is going to be really detailed around small businesses.

Small business industry is something we really want to be inclusive of.

So, much of our entrepreneurs, our nonprofits.

Of those, "small business" definition can be an organization with 50 employees or less.

So, within this impact statement, there are two areas around the cost of compliance and the impact of small business and quantifying how many small businesses we see impacted here.

So again, I'm just going to let the slide set for those that are first-time seeing these drafted impact statements, and then I'll go ahead and read them out for us.

I'm really good at holding silence. Don't worry.

All right, let's read these drafted impact statements around small business.

So the first one would say: The ordinances do not directly regulate small business, but potential indirect interactions exist with small businesses, property management firms and landlords, of course, legal services contractors, nonprofit community partners, and mitigation—mediation providers, excuse me.

The estimate would be less than 100 small businesses to be impacted by this, by this rule adoption and within these rule requirements.

The second statement is more about those impacted, of those estimated less than 100 small businesses, no significant adverse impact on small business is anticipated.

The rules do not regulate business operations, nor require expenditures from small businesses. To the extent that landlords are often small business owners and interact with this eviction system, the program may benefit them indirectly, right?

We think about our landlords a lot here.

We, we, we understand that there is always a balancing of, of eviction prevention

and, and how that's going to hit some of our, our folks that provide landlord resources here in the state of Oregon.

Helping tenants remain stable actually keeps more money in everybody's pockets, right?

And it ensures that the landlord can keep receiving that rental payment through, like, a rental assistance and things like that, that also can create a space that that landlord may not have had any, you know, opportunities for resources from, from the tenant. Also, we all know how expensive eviction turnover cost can be and the court costs and everything on all parties involved.

So, we understand that this mitigates some of that in place, keeping folks stabilized.

Now looking at our projected small business impact statements, I see a bunch of nods, which I appreciate, but are there any other feedback that you all have here?

MB **Marisa Ball** 37:00

This is great because it is 100% true.

Keeping these, the tenants stabilized, it is such more cost effective, for one, for the landlord and our tenants because it does cost a lot to evict them, and once they become homeless, it costs us even more money getting them rehoused and so on and so forth.

So yeah, this is, this—

DH **DAVIS Jaci * HCS** 37:24

Yeah, and then you layer the wraparound services and everything else, right, Marisa, it's, it can be very costly.

MB **Marisa Ball** 37:28

Right.

Oh, it's very costly.

I mean, if you think about even like the medical, the medical aspect of having somebody removed from their home and putting them on the streets, they're ending up in hospitals when, you know, because they're, they're cold, they're too hot, you know, the heat exhaustion, the cold, you know, they're not being properly medicated. So, it does cost a lot more to the community to have them unhoused than it is to house them.

DH **DAVIS Jaci * HCS** 37:59

Yeah, that makes sense.

Does that align with your understanding, too, Breezy and Stacie?

BP **Breezy Poynor** 38:09

Yeah, we, definitely, when we're able to keep folks in their home and keep them in their community, as well.

I think that's a piece that we don't often in these spaces talk about, is the impact of having folks be evicted from their community. A lot of times they have these, you know, support systems there, and so we can keep them in their community, we can keep them in their home, and oftentimes help them with those wraparound services, be able to, to identify how to keep their housing on their own moving forward.

And the landlords love it.

DH **DAVIS Jaci * HCS** 38:48

Mm hmm.

SS **Stacie Sabourin** 38:52

I think the only thing that I would really say is that "the estimate would be less than 100," that might be a little low.

DH **DAVIS Jaci * HCS** 39:03

OK.

SS **Stacie Sabourin** 39:05

I'm from, you know, Wasco, Sherman, Hood River Counties, and so all of our landlords are—or, most of our landlords are all small businesses.

So overall, in the whole state of Oregon, I think that number might be a lot higher.

DH **DAVIS Jaci * HCS** 39:22

Do you have a better number that you think that we, you know, I'm not saying that you understand the whole state's awesome, you know, amount of small businesses we have here, but what kind of number would you think would be more applicable then?

SS Stacie Sabourin 39:36

I mean, maybe 500.

DH DAVIS Jaci * HCS 39:42

Yeah.

That's a good question, Kevin.

I, I also want to point out, Kevin, I see your hand raised, but unfortunately our attendees, because we're in a Team webinar, they don't have the function of coming off of mute, but if you had comments or questions that you'd like to provide, our chat box is open for you.

But we don't have that function to unmute for attendees, unfortunately.

I think that we could probably work with our research and development team.

We have a fantastic research and development team, and we have some external-facing dashboards—they're called Tableau dashboards—as well, that really help kind of, like, break down a lot of our understanding and data that we serve, mostly the communities in which we're reaching, but also can encompass some of those small businesses and partnerships.

So, Stacie, that's a good, good point of feedback here, and I think our team can bring that back and, and kind of relook at that estimate number and see if it might be a bit higher for our, our state's reach here.

Back, Kevin, I see your question in the chat, too, about any data or anticipated impacts on trial courts.

We would assume that the number of evictions being lower would also have a positive impact to those trial court numbers, as well, as we, we understand that those trial courts are largely overwhelmed with the amount of cases that they're seeing, and so this will helpfully alleviate some of that entire burden on the industry and just that that whole proceeding in process.

I'm not sure if our team can speak to any other anticipated, but I think any kind of eviction diversion kind of alleviates some of that within our trial court services, as well.

I think that those are my, I'm looking at questions continuing in this chat.

Kevin, I think that those are questions that maybe our staff can follow up with you.

I want to keep our team focused on our drafted impact statements here so that we can move through and make sure that we're going to be successful in reviewing all

of those today.

If you would like to leave any contact information, Kevin, we can go ahead and get back to you.

I'm going to move us forward into the next slide for our review in our cost of compliance impact statements.

Now this would mean, hey, we're going to be doing these rule changes, you all. This is how much it's going to cost for me to do all the things that you just told me to do in your rules.

So, think of that as like a, a quick little plain language summary here.

And just like the prior drafted impact statements, I'm going to go ahead and let those sit for those that might be brand new to looking at these drafted impact statements.

All right, we'll go into reading the cost of compliance statements for those that maybe aren't able to read the, the slide. There is a lot of text, so I do apologize. Again, all of our RAC materials are all shared on the OHCS website under the rules, so this all of the RAC materials, any feedback we receive from our RAC members today and of course any public comments and our responses to that will all be saved on our OHCS rules website.

So I do, I do know that there's a lot of text on our slide, but hopefully this will be a good resource even after today's meeting for us.

Compliance with the rules may require labor, such as staff for the data entry, case management, fiscal tracking, supplies such as secure file storage, computers, Internet access, and, of course, our HMIS services, which is the homeless management information system, compliance system, and administration such as training and privacy, private notifications—privacy notifications, excuse me, and of course, financial documentation requirements.

Now these all allow us to maintain the expenditure reporting requirements for ORE-DAP funding, which is why we then have to ask our partners here for those types of compliance requirements.

Our ORE-DAP program guidance also defines spending thresholds for administration and, of course, capacity building. Those are also specified in the program manual. Grantees must engage in a quarterly and annual reporting on expenditures and program outcomes.

Data entry into that HMIS system include time, timeliness standards and budget change requests and fiscal tracking through the OPUS—is it “OPUS”?

Is that how you say that?

Oh, look, OK, I got it right.

There's so many acronyms here.

Administrative burden is typically the publicly funded grant programs and is eligible for reimbursement through administrative funds through provided, through grant awards, so there is some alleviation that we give, you know, can alleviate that, but we want to be very transparent that we understand these reporting requirements do not come easy, especially for folks in maintaining staff and having to train them and having to keep all of their licenses and all the other reporting requirements that a lot of our, our partners have to do.

But understanding the cost of compliance statements as we have drafted, what should we add?

What should we take out?

What kind of feedback do our RAC members have here?

Is there any other cost?

MB **Marisa Ball** 46:30

For administrative cost is great because I know sometimes in a lot of programs that they don't, they don't cover that, and so the agency has to come up with that by themselves.

So, that sounds like a sounds a good, good deal.

BP **Breezy Poynor** 46:49

I'm kind of wondering about using the term "case management," only because I think we would just want to make sure that there is the kind of definition of what that looks like, because it can look a lot of different.

I'm looking at the manual right now, and it does share a little bit of what, you know, are inclusive of, but what is the expectation around?

I think one of the things that we've run into over the last couple of years is, with the different funding streams, there's a different level of expectation around the services that are being provided to the household and how many households you have to serve and how much funds you have to do it with, and so you kind of almost become less of being able to provide case management and more of just trying to get the eligibility pieces and keep people in their homes.

And so I think being able to just, to find out maybe even a little more in the manual

or what the expectation is would be good just because, like across, I'm sure across the state of Oregon, what case management is defined is different.

I know even within my own agency, you know, what case management looks like across programs can be really different, so I think that's the only piece of this that—you know, I don't have any concerns about it, but I think we do need to define it or what the expectation will be whether that's in the manual or, you know, in a compliant statement.

DH **DAVIS Jaci * HCS** 48:24
We're taking notes.

SS **Stacie Sabourin** 48:24
Maybe it could.

DH **DAVIS Jaci * HCS** 48:25
Sorry, we're, that's all of our heads are down and we're doing, we're taking notes of your feedback.
Thank you for that.

MB **Marisa Ball** 48:30
I'm, I'm completely in agreeance with Breezy.
We have case managers, and a lot of the times our participants get confused because you're like, well, you're my case manager, you're supposed to be providing XYZ.
In all actuality, we're determining how much their income, rent, and housing payment is.
So case management could be a wide—it's a broad term.
It's a very broad term.
So that that's a very good point, Breezy.

SS **Stacie Sabourin** 49:01
Could it just be like “participant services” or something so that it includes all of those?

BP **Breezy Poynor** 49:11

Yeah, I think that that's, that's great.

We've been able to partner a bit of our, with our, you know, kind of program to try to create spaces for recognizing when households are in need of just a payment, or maybe they're in need of, you know, that, that wraparound services, and so yeah, being just a little more, you know, broad with that might be really helpful.

DH **DAVIS Jaci * HCS** 49:51

Also seeing some feedback that's also, some questions in our chat around indirect costs and maybe housing navigation.

I think that was definitely something that is a term that's been used.

SS **Stacie Sabourin** 50:08

I kind of just appreciate that this is in here and really like lays out that what can be, you know, covered sometimes it gets kind of confusing, you know, between all the grants, what's covered and what's not.

And so I just appreciate that those are all laid out.

DH **DAVIS Jaci * HCS** 50:28

Thank you.

And if there's anything else that comes to you all RAC members, especially after today's meeting and those in virtual attendance that we should be encompassing later on after you've had time more time to think about it.

Especially when we come together in Community, right when we're starting to really think about things and hearing from different people's perspectives.

I have so many light bulb moments after the fact that I'm like, 'Ah, I want to bring that in.' So feel free to also, you know, if there's other things that come to you in this process, let us know.

And I will move us into our final impact statement review.

And that is around that racial equity impact statement.

For those of us that are unfamiliar with this reporting requirement, back in 2021, there was a, a legislator that wrote a bill, House Bill 2993, that was successful within that legislative session and it created this racial equity impact statement here.

So a part of our reporting here is to align and understand all of this impact, especially for those that have been under, underserved or that those that we know are, shows are overrepresented.

We also try to include as much inclusive information, not just about racial equity, but also about other folks that we're intentionally trying to set goals to reach.

Think about with, like, our, our children or elderly or veterans communities in general.

So, some of our racial equity impacts statements might be a little bit more encompassing than just talking about racial equity around our state of Oregon.

So again, I'll, for the last time, I will let this one just sit for folks that have not read it before and allow folks to, to see what we have drafted.

I'm so glad my dogs are behaving right now, y'all, 'cause this never happens.

It's always when I try to do the quietness that the dogs—and here comes a kitty cat.

It's fine.

We'll go ahead and get started.

Let's read this last racial equity impact statement that we have listed here today.

The ORE-DAP rules prioritize partnership, culturally responsive organizations, and targeted outreach for historically marginalized groups, groups including Black, Indigenous, Latinx and other communities of color, as well as veterans, persons with disabilities, and farm workers. These rules positively affect racial equity by requiring culturally responsive services delivery, intentional referral network across social services, and legal sectors, and prioritization of underserved households that are at immediate risk of eviction.

This supports the Oregon statewide housing plan. If you guys aren't familiar with our statewide housing plan, please take a look at the OHCS website.

You can just search it, you'll find it.

You'll see all of our goals here.

And this, these types of efforts really do support our internal department's equity goals and ensure housing stability interventions are delivered equitably across all demographics.

Now, are there any other comments or inclusions that we should or edits to this drafted racial equity impact statement?

OK.

Seen it all, look pretty good?

No edits, no recommendations and changes.

I guess I could just say, to the part about where it says that it is, just like that, but it was a requirement—

DH **DAVIS Jaci * HCS** 55:30

Requiring culturally responsive service delivery.

SS **Stacie Sabourin** 55:31.

Yeah. So just maybe like, what does that mean?

How do we do that?

How do we complete that goal?

DH **DAVIS Jaci * HCS** 55:55

That's a good question.

Shauna?

Do you have any insight to that one? Just to clarify what we have drafted here.

WH **WILLIAMS Shauna * HCS** 56:02

I think there's lots of different ways to do it, and sometimes it depends on the agency that is already putting things in place, but they don't always recognize kind of what this means.

So, it may be something where you're looking at the types of households you're serving and seeing if there's an underserved population there, right?

So that you're looking at what the makeup of your community is and saying, "Wait a minute. We're at 5% of this type of, you know, population, but we're not anywhere near that with serving, and is there a way that we can step forward and do a little bit of targeted outreach to that type of that population?"

Right?

Or making sure that you're looking and providing documents or ways to reach out to people who maybe English is not their first language.

So it's, there's different little ways, I think, that can do it, and we're always happy to, to talk with anyone about what might work best in their community.

But I think that's kind of like requiring that culturally responsive service delivery.

It sounds like a difficult thing, but it's not necessarily that.

So, I think we could do a better job.

It sounds like of, getting that definition out of different ways that people can work within their own community to, to ensure that they're serving everyone equally.

SS Stacie Sabourin 57:13

I just I think of it as being black and white, and if it's a requirement, like, what do I need to give you to meet that requirement, that's kind of—

WH WILLIAMS Shauna * HCS 57:21

I think we've run into that a lot.

Yeah, 'cause like I said, it's a lot of words that sound very serious and sound very, like, "you have to have this in place," and what we found is, like, that it is the definition kind of gets lost in it, right? 'Cause there isn't just one way to serve different populations of people.

Like I said, every community kind of looks different. How I may look at a community that maybe has a higher level of veterans and needs of services. How I, kind of, reach out response, you know, responsibly to that group, may look very different, different than if I'm reaching out to a population of farm workers in another community.

So, like I said, I think bringing that up, it's, it's not just the first time I've heard it. It continually comes up, but I get that, kind of, those words drive it like you're required to do this, and I want to see absolute proof compliance, right? Like, how?

How do we get there?

So like I said, I think it's a broader kind of definition, and I think we make it harder on ourselves sometimes by not just kind of explaining a little clearer.

So it's really great feedback for you to tell me that.

Thank you.

SS Stacie Sabourin 58:26

Yeah.

DH DAVIS Jaci * HCS 58:31

I think that's a great highlight, too, about when we try to be as flexible as possible in our rules and we can get as detailed and we can get really into templates and other types of examples, perhaps even later on within our guides or within our contracting spaces and negotiations, or however those come into our, our spaces.

MB Marisa Ball 58:54

I'm, I have to say that I'm glad that you guys are looking on that and continuing to keep this kind of language in in the program rules. As we know, the administration—I'm not talking politics—the administration has taken a lot of the DEI out of everything, and so I'm really glad to see that in a manual that this is still being prioritized.

DH DAVIS Jaci * HCS 59:20

I appreciate that, Marisa. I think I hear at the agency—and I can't speak behalf, on behalf of all of our, our departments and programs here—but I can say that we, we really found a lot of our goals and the way that we are looking at around our data and when we look at what has happened historically and what we're seeing now, like we, the numbers just, they are a direct reflection of who we need to best serve and who maybe has been carved out as some of our services in general. So we we're happy to help continue to do this and as long as our legislature has a racial equity impact statement included, we will be talking about it in all of our rulemaking processes as well.

MB Marisa Ball 1:00:04

That's great to hear.

DH DAVIS Jaci * HCS 1:00:09

All right, y'all.

Well, we'll take that feedback in with us.

I'm going to stop share for just one second.

Let me see if I can.

Umm.

Let's see.

All right. So on our OHCS websites, we have all of the materials that you can find.

I also want to invite all of you that are in a, want to be involved on a rules advisory committee in the future, you can absolutely get engaged in our process.

Our team is gonna create some summary slides for us real quick out of our discussion that we've had today, but very quickly I wanted to pivot over to our OHCS website. Right down here is where you're gonna find all of that engagement

opportunities.

So if you use this rules engagement form, it is hyperlinked on our page. You can sign up to be on any rules advisory committee in the future with us.

And you can also see here the Oregon Eviction Diversion, Diversion and Prevention program, or ORE-DAP. We have, of course, your registration link, but also all of the linked RAC materials.

Once this filing has been published in the June bulletin, you can navigate down to this rule filing, and this is where you're going to find all of our filings, our notices, any public comments and the responses that we have to those all the way through our rulemaking process.

And so I just wanted to quickly orientate folks to that one.

And really quick and I'm going to stop share and bring my slides back up.

And I turn it over to Kaellen to review our, our feedback that we've received.

Just one second, let me grab it.

H **HESSEL-OWENS Kaellen N * HCS** 1:02:07

Great. Thank you, Jaci.

So while you have all been discussing this information that we presented to you, I have been taking notes and throwing what we've heard from our RAC members into a couple slides, which will eventually be something that you can hopefully read.

And we just want to know, did we capture it correctly?

Did we write it down the way, do we miss anything, that sort of stuff?

BP **Breezy Poynor** 1:02:43

I think it's good.

I think it's, I'm doing this work for a really long time, and it's nice to see this kind of get codified in my, you know, until the pandemic, we really didn't have eviction prevention as a, as a space to, you know, to count on.

And so being able to move forward, recognizing that this is a need for the community, pandemic or not, is really exciting.

And then just to have really good guidelines, it's also good.

H **HESSEL-OWENS Kaellen N * HCS** 1:03:13

Thank you for that, Breezy.

So when it comes to the fiscal impact statement, we've heard that you appreciate us,

including a mention about the downstream costs for these small business impact. I heard it is 100% true, keeping tenants stabilized is the most, is more cost effective. Also that it costs more to the community and to the actual individuals, organizations involved, to provide support post-eviction than it does to prevent the eviction from happening in the first place.

Another benefit of eviction prevention is that it keeps people in their communities, so all of their social supports and network stay intact.

There was feedback that we might have underestimated the amount of small businesses that would be impacted.

I think it was Stacie who was saying that 500 might be a better number, so we'll look into that.

Then over for cost of compliance statements, the line that mentioned administrative costs is great.

Also, that phrase "case management," we had some conversation about what exactly does that mean here, since that definition can vary, what is the expectation of the services that are going to be provided to the household when, you know, we say that's being included, so further definition or examples would be beneficial.

Someone also suggested the term "participant services" as an alternative.

And then when it comes to the racial equity impact statement, more explanation is needed of what requiring culturally responsive service delivery means.

And then also some appreciation for even having a racial equity impact statement and continuing to look at our rules and our programs through that lens.

OK, next slide.

I did not hear anything that needed to be tabled in a parking lot to be discussed later, but there were some follow-up questions.

And like, the two main ones, we're looking into trying to figure out a more accurate count of the small businesses that would be impacted and then reconsidering the use of the term case management since it is so broad.

So did we get that correct?

Did I forget to write down something someone said?

This is accurately summarized what we discussed today.

RAC members, feel free to get off mute and say stuff, but there is also a poll question with essentially the same question.

Does this sound like what we have discussed today?

DH **DAVIS Jaci * HCS** 1:06:11

Hopefully that showed up in the chat all right.

Great.

And we will be using our transcript today and the recording to go back and make sure we capture our notes and summaries more intentionally.

This is, I appreciate Kaellen jumping in here and creating some live notes for us.

H **HESSEL-OWENS Kaellen N * HCS** 1:06:35

Any questions or areas that need further clarification that are not already mentioned in the chat? Please throw those into the chat.

And then, yeah, I guess this is probably the last call.

RAC members: anything else you would like to say?

DH **DAVIS Jaci * HCS** 1:06:56

OK.

Well, then I'll jump into the next steps if it's all right, Kaellen, just kind of walk us through what to expect.

As we talked about, this last month we've been working really hard with our partners at Department of Justice, of course all the leadership, and the program folks and team that you see today, and we'll be kind of cleaning up our, our rule draft and getting that in prep with the feedback that we've received today for the filing in June. Now that notice of proposed rulemaking and the inclusion in the June bulletin will basically open up all of our public comment and legislative comment periods, and we intend on having a rules public hearing again around the third week of June, so look out for that rulemaking announcement.

We'll make sure we send it to all of our RAC members here today, as well.

We're expecting to have our, our legislative comment period conclude around July.

And then at the end of July, our leadership team, partnering with our governor's office and the Department of Justice and all of those great folks that we get to partner with when developing public policy, will make those final decisions.

And we are planning to file a permanent rule order, then would codify all of these changes about in August.

So, that's our expected timeline.

If you have not signed up to receive rulemaking notices, I highly suggest you do so. So that way you can stay up to date, as well.

And really quickly, I just wanted to say thank you.

I know Shauna's contact information is listed on this slide and she will remain your, your RAC and your rulemaking contact for the remainder of this ORE-DAP process, but I really would like to thank you all for your time and your insight in today's project and our rules advisory committee space.

I thought today's conversation was very thoughtful and thorough, and your participation in it was really appreciated.

I really would love to have you all participate in the future RACs and all of this and virtual attendance as well.

It's your feedback that helps us ensure our rule making is always grounded.

And it includes your expertise and always reflective of our real world, real world impacts.

And also, feel free to share any of the public impact for folks in virtual attendance today.

They weren't able to be off of mute or weren't on our rules advisory committee.

As I mentioned, we do have our next steps and we will be in more of a listening community space with our, our legislature and the general public as we kind of get a little bit more solidified in our draft of what these ORE-DAP rules will look like, and we'll actually get them presented to the public next month.

Thank you again for your engagement, all the candor, entertaining my silly jokes, and the commitment, of course, to continuing to help us do what's right for all of our Oregonians that we serve.

I look forward to working together, y'all, in the future, and you get a gift of time back.

I'll see you all the next time.

Thank you so much for your partnership.

BH **BENNETT Rachel * HCS** 1:10:06

Thank you everyone.

DH **DAVIS Jaci * HCS** 1:10:08

Thank you.

- stopped transcription