

Rules Advisory Committee Statewide Shelter Program (SSP)

Date/Time: September 2, 2025, at 1:00 p.m.

Location: Teams Webinar – [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 SSP and subsequent eligibility of these shelter resources.
- To create space to uncover different perspectives that can inform the implementation of the SSP and gather feedback about the potential impacts as required by state rules development process.

Agenda

Welcome & Introductions

- Be prepared to share your name, work affiliation and position, and what lens or unique perspective you bring to the discussion on the SSP.
 - *Icebreaker: What is a rule that you live by?*

Overview of OHCS and the Rulemaking Process

Background on SSP Development:

- 2024 Shelter Workgroup
- House Bill 3644 (2025)
- June 2025 engagements

Opportunity to Review & Improve the Draft Rules and Program Manual

- Do you see opportunities to adjust the rules to better serve your communities?
- Are the elements of the program manual that don't align with the rules?

Impact Assessments

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

Next Steps & Closing

- Review comments and feedback collected during the meeting
- Announce future engagement opportunities and review timeline

RAC facilitator's contact information:
Rachel Bennett; rachel.bennett@hcs.oregon.gov

Rules Advisory Committee Statewide Shelter Program (SSP)

Rules Advisory Committee Participants:

1. Earl Bowers
2. Kate Budd, Lane County Human Services Division
3. Chris Byrd
4. Ashley Carson, Center for Hope & Safety
5. Marci Cartagena, Our Just Future
6. Mickie Derting, Central Oregon Intergovernmental Council
7. Tim Ellsworth, Washington County
8. Katie Gentry, Washington County
9. Elissa Gertler, Clatsop County
10. Jimmy Jones, Mid-Willamette Valley Community Action Agency
11. Rep. Pam Marsh, State Representative
12. Brooke Matthews, Oregon Continuum of Care
13. Evelyn McCoy-Harris, Seed of Faith Ministries
14. Thomas McGregor, Peace at Home Advocacy Center
15. Brook O'Keefe, City of Bend
16. Megan Smith, Sheltering Silverton
17. Celinda Timmons, Umatilla County
18. Matthew Vorderstrasse, North Bend City/Coos-Curry Housing Authorities
19. Jody Warnock, Community in Action
20. Regan Watjus, City of Eugene

Process Agreements from Rules Advisory Committee

This is intended to be a creative, brave space where we can think about how best to serve Oregonians with the adoption of these rules to remove barriers to access shelter 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 Teams 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.

RAC facilitator's contact information:
Rachel Bennett; rachel.bennett@hcs.oregon.gov

Rules Advisory Committee Statewide Shelter Program (SSP)

- **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.

Statewide Shelter Program (SSP) RAC

Proposed Impact Statements

❖ 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, economic, and racial equity 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 Page](#)

❖ 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 proposed rules will have a fiscal impact on state agencies, local governments, and the public. For OHCS, the primary impact includes staff time and resources to administer SSP, conduct monitoring, and provide technical assistance. These costs are covered under current service level administrative funding and Operational Supports funding in HB 5011 (2025). For local governments serving as grantees or subgrantees, administrative and reporting costs are also incurred but are reimbursable (up to 2% or 8% of each award, depending on organization type and grantee vs subgrantee). For non-participating agencies, there is no fiscal impact. The public benefits economically through access to stabilizing services like emergency shelter and housing focused activities.

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: The SSP rules may directly impact small nonprofits that operate shelters, alternatives to shelter, motel operators, street outreach, and other homeless service providers. SSP rules result in positive direct benefits for these small businesses that can be reimbursed for SSP-related services. SSP rules do not regulate other small businesses outside of nonprofits that receive SSP funding. Small businesses that are located near SSP shelters may experience positive benefits as a result of SSP rules because of new shelter standards and requirements.

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: OHCS estimates that approximately 100-150 small businesses could be subject to or benefit from these rules. This includes local homeless service providers, nonprofit organizations, and hotel and motel businesses.

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

Proposed Statement: Grantees and subgrantees must complete several reporting and administrative activities. These include regional assessment, regional plans, policy development (e.g., grievances, privacy, conflict of interest), HMIS data entry, financial and performance reporting, and staff training on best practices, harm reduction, and trauma-informed care. Costs are routine and reimbursable. No third-party professional services are anticipated.

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

Proposed Statement: No major equipment purchases are required. Entities will need routine labor investments in administrative work, including development of regional plan every two years, HMIS access, and training. OHCS has included administrative funds and capacity building as eligible costs to help cover staffing and operational needs. Required labor includes training participation, policy creation, and regular data reporting.

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

Proposed Statement: OHCS involved small businesses, such as nonprofits and homeless service providers, through a series of engagement sessions prior to drafting rules and then again by invitation to participate in the Rules Advisory Committee after the rules were drafted. OHCS invited these small businesses to virtual listening sessions and to complete a survey that helped shape the draft SSP rules and program guidance.

Question 7: Draft statement identifying how adoption of rules will affect racial equity in this state.

Proposed Statement: According to 2024 Point in Time Count, Oregonians who are Black, Indigenous, and People of Color (BIPOC) experienced homelessness at higher rates than their proportion of the population. The SSP rules and program guidance as implemented by rules are designed to improve outcomes for BIPOC communities. For example, SSP rules create low-barrier policies, shelter exit policies, and a regional plan that aims to create equitable access to shelter and equitable outcomes from shelter to permanent housing. The SSP rules related to the regional plan also work toward more inclusive strategies to engage those with lived experience and subpopulations most impacted by homelessness to inform regional strategies. These elements reflect OHCS's commitment to equity.

Oregon Administrative Rules for the Statewide Shelter Program (SSP)

813-275-0010

Purpose and Objectives

The purpose of OAR chapter 813, division 275, of the administrative rules is to implement the Statewide Shelter Program (SSP). Funding for the SSP program comes from House Bill 5011 (2025) as authorized by the Oregon legislature and HB 3644 (2025). HB 3644 mandates Oregon Housing and Community Services (OHCS) to establish the program and these rules. OHCS is designated as the state agency responsible for administering the SSP program. The purpose of the SSP program is to establish a statewide shelter program for the purposes of reducing unsheltered homelessness and transitioning people from experiencing homelessness into housing stability through increased coordination and stability of funding.

813-275-0020

Definitions

Terms used throughout this division (OAR 813-275) may be defined in Oregon Revised Statute (ORS), in the OHCS General Definitions (OAR 813-005-0005), or in the SSP Manual. Terms used within this division observe those definitions, unless defined in this rule. For the purposes of this division:

- (1) "Homeless Management Information System" or "HMIS" is defined in 24 CFR 576.2.
- (2) "Homelessness" means lacking a fixed, regular, or adequate nighttime residence in accordance with the SSP Manual.
- (3) "Household" means an individual living alone, family with or without children, or a group of individuals who are living together as one economic unit.
- (4) "Housing Focused Activities" means those activities that directly connect Participants to critical resources and services that support participants moving into a stable housing destination.
- (5) "Low Barrier" means policies and shelters that provide services with minimal preconditions. This is further defined in the SSP Manual.
- (6) "SSP Manual" means the Statewide Shelter Program Operations Manual, as described in OAR 813-275-0030.

- (7) “SSP Program Provider” means an organization that provides services and conducts eligible activities as defined in the SSP Manual. “Participant” means a Household who is receiving OHCS funded services through SSP .
- (8) “Regional Assessment” is defined in House Bill 3644 (2025).
- (9) “Regional Coordinator” is defined in House Bill 3644 (2025).
- (10) “Regional Plan” is defined in House Bill 3644 (2025).
- (11) “Shelter” is defined in House Bill 3644 (2025). Eligible shelter types, services, and requirements are outlined in the SSP Manual.
- (12) “Safe Temporary Emergency Placement Sites (STEPS)” means vehicular camping and basic free-standing structure programs that do not meet all of the shelter standards, but provide Participants with a place to stay either in their vehicle, or in a free-standing structure provided by the site when available, that is secure, free from ticketing, and meets minimum requirements as outlined in the SSP Manual.

813-275-0030

SSP Manual

The SSP Manual dated MONTH DAY, YEAR is incorporated into and adopted as part of division 813, chapter 275 of OHCS’s administrative rules. The SSP Manual may be accessed online at the OHCS website.

[Link to manual on OHCS website here]

813-275-0040

Administration

- (1) OHCS may enter into agreements with Regional Coordinators and SSP Program Providers to provide SSP program services (see OAR 813-275-0060) in such manner as to provide holistic coverage statewide.
- (2) OHCS shall implement a funding formula for the first year of SSP funding covering the period 7/1/26-6/30/27. This funding formula will be updated periodically to reflect performance of the system and changing needs, in accordance with HB 3644 (2025), Section 2(8). All data sources are determined by OHCS and are subject to change.
- a. The funding formula calculation used to determine need and past performance by region may integrate the following information:

- i. Number of Beds funded through SSP existing at beginning of the relevant regional plan coverage period
- ii. Total Cost per SSP-supported bed for region for previous performance period
- iii. Homelessness count measured by most recent validated count
- iv. McKinney Vento Student Homelessness count for most recent validated period
- v. Housing availability
- vi. Low-income households
- vii. Non-state shelter funds utilized in previous performance period
- viii. Non-state shelter funds availability identified in most recent regional plan
- ix. Shelter utilization for previous performance period
- x. Percentage of unduplicated households served by program who exited to a permanent housing destination
- xi. Percentage of unduplicated households served in emergency shelter who exited to “place not meant for habitation.”
- xii. Percentage of funds spent down for most recent performance period
- xiii. Other factors deemed appropriate by the Agency

(3) Regional Coordinators may establish agreements with SSP Providers that meet the requirements of ORS 458.610(6) to provide SSP services in the Regional Coordinator’s service area. OHCS may request to review agreements to ensure alignment of agreements with program and policy intent

(4) Regional Coordinators and SSP Program Providers must administer programs in accordance with the SSP manual and must establish policies, as outlined in the SSP manual, including but not limited to:

- (a) Low-barrier and Nonexclusionary practices
- (b) Exit and separation from services

(5) A designated portion of SSP funds, as determined by OHCS, are reserved for Regional Coordinators and SSP Providers to use for administrative costs.

813-275-0050

Participant Eligibility

(1) Eligibility requirements are described in the SSP Manual.

- (2) Status of U.S. citizenship shall not be considered as an eligibility criterion for the SSP program.

813-275-0060

Use of Funds

- (1) Use of SSP program funds must be in compliance with the SSP Manual.
- (2) To the extent of available funding, eligible SSP services include, but are not limited to:
- (a) Housing Focused Activities
 - (b) Shelter Operations
 - (c) STEPS Operations
 - (d) Street Outreach
 - (e) Capacity Building
- (3) SSP funds may be used to supplement existing funds and to support already established programs. SSP Providers may not use SSP funds to replace funds currently being received from other sources, or that are available or reasonably expected to be available to the SSP Provider for the same purpose.
- (4) Recipients of SSP funds must prioritize maintaining shelter beds and no net bed loss prior to utilizing funds for other allowable uses identified within the SSP manual.

813-275-0070

Funding Agreement

- (1) Prior to providing any SSP services using OHCS funding, Regional Coordinators must enter into an agreement with OHCS and submit a Regional Plan and Regional Assessment to OHCS.
- (2) The Regional Plan must meet all requirements of form and content as established by OHCS in accordance with the requirements outlined in HB 3644. Regional Coordinators must adhere to OHCS requirements and deadlines for submitting Regional Plan. The Regional Plan is subject to approval and modification by OHCS.
- (3) OHCS will not approve a Regional Plan unless it meets sufficiency requirements. Sufficiency is based on the quantity, thoroughness, and quality of content that is satisfactory to OHCS. This includes, but is not limited to, providing relevant information

necessary for OHCS to assess compliance with all SSP program requirements and any other standards, goals, and requirements established by OHCS.

813-275-0070

Recordkeeping and Compliance Monitoring

- (1) Regional Coordinators must maintain accurate financial records satisfactory to OHCS and consistent with SSP requirements. SSP Providers must have an accounting system in place satisfactory to OHCS and must utilize an approved Homeless Management Information System (HMIS) database, or other database as approved by OHCS, for data and fiscal entry.
- (2) Regional Coordinators must maintain other SSP program records satisfactory to OHCS and consistent with SSP program requirements, as detailed in the agreement with OHCS. Such records must be satisfactory to OHCS in substance and format.
- (3) Regional Coordinators must provide OHCS with all required reports, data, and financial statements by submission deadlines and satisfactory to OHCS in form and substance as identified in the SSP program manual and as requested by OHCS.

Statewide Shelter Program (SSP)

Date effective



Statewide Shelter Program Operations Manual

Contacts

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

Published date: DATE

Table of Contents

| | | |
|-----|--|---------------------------------------|
| 2. | Program Summary | 3 |
| 3. | General Program Requirements | 3 |
| | (A) Program Standards | 3 |
| 4. | Participant Eligibility | 23 |
| | (A) Household Composition..... | 23 |
| | (B) Housing Status | 24 |
| | (C) Income | 24 |
| | (B) Assets | Error! Bookmark not defined. 4 |
| | (D) U.S. Citizenship..... | 254 |
| | (E) Oregon Residency | 25 |
| 5. | Allowable Program Components and Expenditures..... | 255 |
| | (A) General Guidance | 255 |
| | (B) Street Outreach..... | 255 |
| | (C) Housing Focused Activities | 288 |
| | (C) Shelter Operations..... | 299 |
| | (D) STEPS Operations..... | 332 |
| | (E) Capacity Building..... | 34 |
| 6. | Financial Management | 35 |
| 7. | Data, Submission and Reporting Requirements..... | 433 |
| 8. | Records Requirements..... | 46 |
| 9. | Applicable Rules and Regulations..... | 47 |
| 10. | Definitions..... | 48 |

(A) Program Summary

The Statewide Shelter Program (SSP) aims to maintain the operations, services, administration, and bed capacity of Oregon's statewide shelter system. SSP prioritizes low-barrier shelters and also supports recovery-based shelters as outlined in this manual. SSP funding supports the reduction of unsheltered homelessness and assists people experiencing homelessness in transitioning to housing stability. SSP funding comes from state general funds.

(B) General Program Requirements

a) Program Standards

Grantees and subgrantees must follow all program standards outlined in this manual. Non-compliance will result in audit findings and may jeopardize funding. This manual includes requirements related to policies and procedures, program operations, financial management, data, and records. Grantees and subgrantees must have stand-alone policies that align with all policy requirements outlined in this manual.

Grantees must ensure that subgrantees have policies and procedures that align with Oregon Housing and Community Services (OHCS) requirements and are consistent with the intent of such a policy/procedure as outlined by OHCS. OHCS reserves the right to require modifications to any policy or procedure that, in its determination, does not meet basic principles or requirements.

b) Policies and Procedures

i) Equal Access

OHCS prioritizes equity in the delivery of the SSP. For the purposes of equal access, gender identity means the gender with which a person identifies, regardless of the sex assigned to that person at birth and regardless of the person's perceived gender identity. Perceived gender identity means the gender with which a person is perceived to identify based on that person's appearance, behavior, expression, other gender-related characteristics, or sex assigned to the individual at birth or identified in documents. Sexual orientation means one's emotional or physical attraction to the same and/or opposite gender (e.g., homosexuality, heterosexuality, or bisexuality).

SSP is open to all eligible individuals and families regardless of sexual orientation, gender identity, or marital status. Grantees, subgrantees, and owners, operators, service providers, and managers of shelters and other facilities funded in whole or in part by SSP funding must grant equal access to such facilities, and other buildings and facilities, benefits, accommodations,

and services according to the individual's gender identity, and in a manner that affords equal access to the individual's family.

Grantees and subgrantees must ensure their admissions, occupancy, and operating policies and procedures protect privacy, health, safety, and security. These policies and procedures must be established or amended, as necessary, and administered in a nondiscriminatory manner to ensure that:

- (1) Equal access to OHCS programs, shelters, other buildings and facilities, benefits, services, and accommodations is provided to an individual in accordance with the individual's gender identity and in a manner that affords equal access to the individual's family;
 - (2) An individual is placed, served, and accommodated in accordance with the gender identity of the individual;
 - (3) An individual is not subjected to intrusive questioning or asked to provide anatomical information or documentation, physical or medical evidence of the individual's gender identity;
 - (4) Nondiscriminatory steps are taken to address privacy concerns, including updating operating policies and procedures; and
 - (5) Eligibility determinations are made in OHCS programs without regard to actual or perceived sexual orientation, gender identity, or marital status.;
 - (6) Placement and accommodation of an individuals in temporary, emergency shelters, and other buildings and facilities with physical limitations or configurations that require and are permitted to have shared sleeping quarters or shared bathing facilities shall be made in according to the individual's gender identity.
- ii) Grantee/subgrantees must document and maintain records of compliance with the requirements in this section for a period of 6 years following the expiration or termination of the SSP Grant.**

iii) Privacy Notification and Release of Information

Grantees and subgrantees must have a written document that meets the requirements of this section if provided to participant in written form, or they must have a stand-alone policy and/or procedure that describes how the grantee or subgrantee are providing this Privacy Notification verbally to participants.

A Privacy Notification must be provided to participants either verbally or in writing, 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/services, data collection, reporting, and monitoring. Personally identifiable information will be shared with Oregon Housing and Community Services (OHCS) and other state agencies that have an information sharing agreement with OHCS and that are administering programs that serve the same or similar participants or populations, 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.”

Participants may also be asked to sign a Release of Information by the grantee or subgrantee that includes the Privacy Notification. If required to sign a Release of Information, in addition to the information above, such form must also state:

“Refusal to sign such authorization cannot be the basis for denying program services to otherwise eligible participants. 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 participant demographic data for the purposes of reporting”.

Grantees and their subgrantees must document in the participant file that a privacy notification was provided to the participant either verbally or in writing. For all other purposes of collecting personally identifiable information, grantees and subgrantees must follow state and federal laws for the collection, use, and sharing of participant information.

iv) Confidentiality and Cyber Security

Participant information must be obtained, maintained, and retained in a confidential and secure manner. Confidential records include all applications, records, files, and communications related to SSP participants. Records include all digital and electronic records, books, documents, papers, plans, and writings. During regular SSP audits and monitoring functions of federal, state, and grantee auditors and examiners have access to all relevant organizational records.

All grantee/subgrantee officers, employees, and agents must be aware of and comply with the confidentiality and cyber security policy and must acknowledge this awareness in writing.

When records are maintained in hard copy, such records must be kept secure, with limited access to only those who have a legitimate interest in and responsibility for participant records. When records are maintained electronically, grantee and subgrantee officers, employees, and agents must securely maintain all confidential information.

Employees of grantees and subgrantees must keep computers, tablets, and cell phones secure by:

- Keeping all devices password protected;
- Keeping organization-issued antivirus software installed and updated;
- Ensuring that devices are not left exposed or unattended;
- Installing security and system updates as required;
- Logging into the organization's accounts and systems through secure networks;
- Accessing internal systems and accounts from organization-issued devices and not personal devices.
- Not lending any organization-issued device to other people. If a device is stolen, change all account passwords immediately.

Employees of grantees and subgrantees will ensure that:

- Computer terminals are located in a secure location, limiting access to only those with a legitimate interest in and responsibility for participant records;
- Computer monitors are cleared (or a screen saver activated) immediately after accessing participant records;
- Computers are locked or turned off if unattended; and
- Access to personally identifiable Homeless Management Information System (HMIS) data is given to only authorized personnel as necessary for OHCS-funded programs.

Employees of grantees and subgrantees must comply with their organization's security policies and procedures. Employees of grantee/subgrantees must follow the grantee's and subgrantee's Confidentiality and Cyber Security Policy. Grantees and subgrantees must identify in policies and procedures how security breaches are addressed.

Grantees and subgrantees must have a stand-alone policy and/or procedure for the confidentiality and cyber security of all records. This policy/procedure must include:

- (1) Identification of how all participant records are secured and confidentially maintained;
A statement that all participant records must be maintained within state guidelines for the proper retention and destruction of records;
- (2) A requirement that all grantee officers, employees, and agents are aware of and comply with the confidentiality and cyber security policy acknowledgement of such policy, in writing.;
- (3) Procedures for preventing unauthorized access;
- (4) Reference to or inclusion of procedures for disciplinary action for security breaches; and
- (5) A statement that all records shall be open for review to federal and state authorized representatives, auditors, and examiners during regular audits and monitoring of OHCS-funded programs.

v) Domestic Violence Shelter Confidentiality Provision:

The address and locations of shelters operating solely as domestic violence shelter facilities funded, partially or in 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.

vi) Grievance/Appeals

Grantees and subgrantees are required to have an established, written, stand-alone policy and/or procedure for addressing participant grievances and appeal requests. Grantees must also ensure that subgrantees have policies and/or procedures that align with OHCS requirements and reflect the intent outlined by OHCS.

Participants must have the right and opportunity to appeal any decision that terminates, denies, limits, reduces, or modifies SSP benefits for any reason. Participants must also have the right and opportunity to initiate a formal grievance in situations where a participant believes their rights have been violated.

Participants must be notified of their right to grieve and appeal, and grantee's policy must clarify how and when participants are notified of this right. While the grievance/appeal policy and/or procedure can be posted publicly, participants must receive written notification for any decision that terminates, denies, limits, reduces, or modifies any benefit. Participants must still receive a denial notice in writing even if the reason is a lack of funding from the grantee or subgrantee.

At a minimum, the policy and/or procedure must include the following components:

- (1)** Inform participants that they can contest any decision by the grantee or subgrantee that terminates, denies, limits, reduces, or modifies any SSP benefits or services and outline the steps to contest the decision;
- (2)** Inform participants of the reason for termination, denial, limitation, reduction, or modification of SSP benefits;
- (3)** Allow any person at least 30 calendar days to request an administrative review/appeal of the decision;
- (4)** Inform participants of their right to present written or oral objections before a person other than the one who made or approved the decision, or a subordinate of that person;
- (5)** Identify reasonable accommodations available for participants with language, mobility, or disability barriers that would prevent them from participating in the review/appeal process and explain how to request such accommodations; and
- (6)** Inform participant in writing of the final determination and the basis for the decision within 10 calendar days of the final determination.
- (7)** Inform participants that they can submit a verbal or written grievance if they believe their rights have been violated and/or they have not received fair treatment during their time accessing SSP programs/services.
- (8)** Provide a response to aggrieved participant within 10 calendar days of grievance submission

Any person designated by the grantee or subgrantee can complete the administrative review/appeal, except the person who made or approved the decision under review/appeal or their subordinate.

OHCS retains the right to require modifications to any policy or procedure that, in its determination, does not meet basic principles or requirements for such a policy/procedure.

vii) Nondiscrimination

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

- (1)** A statement that grantees will comply with all federal, state, and 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):
 - (a)** Refuse to accept an application for housing assistance or services;
 - (b)** Deny an application for housing assistance or services;
 - (c)** Set different terms, conditions, or privileges for housing assistance or services;
 - (d)** Provide different or specific housing, facilities, or services;
 - (e)** Falsely deny that housing is available for inspection or rental or that services are available; or
 - (f)** Deny anyone access to a facility or service.
- (2)** Identification of how applicants and 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.

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 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 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 and prioritization policy.

OHCS reserves the right to require a prioritization of participants when such prioritization is intended from a specific funding source. Grantees and their subgrantees must adhere to such prioritization required by OHCS and such prioritization requirement takes precedence over any grantee or subgrantee prioritization.

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 www.fhco.org.

viii) Limited English Proficiency

The federal government has issued a series of policy documents, guides, and regulations describing how grantees and subgrantees should address the needs of persons with Limited English Proficiency (LEP). Persons with LEP are those who have difficulty reading, writing, speaking, or understanding English and do not use English as their primary language.

Grantees and subgrantees must have a stand-alone LEP policy and/or procedure that includes the following:

The actions grantee took to identify LEP populations in their service area and cites any source(s) used for evaluation;
Defines actions grantee will take to provide language assistance and address language barriers;

(1) States how and how often staff will receive training about assisting LEP persons; and

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 and subgrantees can create a written Language Access Plan (LAP) to provide a framework to document how their programs will be accessible to all populations in their service areas. Grantees and subgrantee who serve few persons needing LEP assistance can choose not to establish an LAP; however, the absence of a written LAP does not release them from the obligation to ensure LEP persons have access to programs or activities.

ix) Conflict of Interest

In the performance of activities under the SSP, grantees and subgrantees will create no potential or actual conflict of interest, as defined by ORS Chapter 244, for any director, officer, agent, or employee of grantee or subgrantee. A conflict of interest exists if, among other things, a decision or recommendation could affect the finances of the grantee or subgrantee's officers, agents, employees, or their relatives. If a conflict of interest exists, the grantee or subgrantee's officer, agent, or employee must provide 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 subgrantee officer, agent, or employee may carry out the initial evaluation required to obtain services for any person where an actual or potential conflict of interest exists.

- (1)** Grantee and subgrantee must have a stand-alone conflict-of-interest policy and/or procedure that includes:
 - (a)** A statement that grantee and subgrantee officers, agents, or employees will create no perceived, potential, or actual conflict of interest;
 - (b)** Identification of how officers, agents, and employees are notified of the policy and/or procedure;
 - (c)** Outlines the process for disclosing, in writing, any potential or actual conflict of interest;
 - (d)** Identifies the process the subgrantee will follow when notice of a perceived, potential, or actual conflict of interest is received, including procedures for staff when employees, board members, friends, or family members apply for SSP services; and
 - (e)** Identifies how records are kept of perceived, potential, and actual conflicts of interest.
- (2)** Grantee and subgrantee must have a conflict-of-interest policy and/or procedure must also outline 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 SSP services. Grantees and subgrantees must comply with conflict-of-interest standards for both individuals and organizations as identified in 24 CFR 576.404(a), 24 CFR 85.36, and 24 CFR 84.42. Grantee and subgrantee must

keep records to show compliance with SSP conflict of interest requirements.

(a) 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, subgrantee, 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 subgrantee wishes to apply for a waiver, they must contact the OHCS Grant Administrator for guidance in submission of a waiver request, which must be approved by OHCS. A waiver is not required for grantee and subgrantee conducting a participant's intake assessment to determine program eligibility if the participant resides in housing where the grantee or subgrantee has ownership interest, to expedite housing placement services and ensure seamless service delivery; and while keeping the participant engaged in services. A waiver of the conflict-of-interest policy for this purpose is not required.
- Grantees and subgrantees cannot steer potential renters to units they own or operate if the renters will use a rent subsidy paid with any OHCS funds. Rent-subsidized tenants can choose to rent from another landlord within the grantee or subgrantee's service area or from the grantee or subgrantee. A waiver request is not required for this situation, but compliance with the conflict-of-interest policy is mandatory.

(b) Individual

- For procurement of goods and services, grantees and subgrantees must comply with the codes of conduct and conflict of interest requirements under 24 CFR 85.36 (for governments) or 24 CFR 84.42 (for private nonprofit organizations); and
- Conflict-of-interest requirements apply to any employee, agent, consultant, officer, or elected or appointed official of the grantee or subgrantee. No person who exercises or has exercised any functions or responsibilities with respect to activities assisted under the SSP, 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. This includes having 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, or in the proceeds derived from an assisted activity, either for themselves or for those with whom they have a family or business tie, during their tenure or for one year following their tenure.

Upon written request, OHCS may grant exceptions to provisions of this section on a case-by-case basis. There is no guarantee that an exception will be approved.

x) Training

Grantee and subgrantee staff who provide direct services must receive relevant training related to SSP delivery.

Required training must occur for staff minimally, within one year from the start date of employment, and current staff must receive training at least once every four years from the date of their previous training. Grantees and subgrantees must track who attended each training, the date of the training, and a synopsis of the training. Training records must be made available to OHCS upon request. Training related to the intent and delivery of the SSP must minimally include:

- (1)** Trauma informed services;
- (2)** Mental health first aid;
- (3)** Harm reduction;
- (4)** Supporting victims of domestic violence;
- (5)** Fair housing;
- (6)** Cultural competency, de-escalation, implicit bias, and other racial equity related topics; and
- (7)** For those using SSP funds for street outreach, training must include outreach safety strategies.

Training may include HMIS training and technical assistance either for grantees or to support subgrantees in maximizing effective use of the HMIS system for data entry, reporting and program management. HMIS training may include costs for staffing to conduct trainings related to HMIS, development and management of HMIS-specific workflows, development

and management of data quality plans, and providing end-user support, ad hoc reporting support, and troubleshooting related to HMIS.

Training is an allowable use of funds as a Capacity Building expense.

xi) Grantee Monitoring

Grantees will be notified 30 calendar days in advance of a monitoring visit and informed of the documents and records to be reviewed, as well as any required staff or Board interviews. OHCS will provide grantees with a written monitoring report that includes any findings, concerns, or comments. Grantees are required to submit timely corrective actions to address findings. Failure to do so can result in the withholding of funds, a requirement to return funds to OHCS, or other remedies as described in the grantee's grant agreement.

xii) Subgrantee Monitoring

(1) Records of subgrantee monitoring performed by the grantees or subgrantees will be reviewed during OHCS monitoring. Subgrantee monitoring reports must be retained by the grantee and made available for review by OHCS or other authorized entities,

At least once during each biennium, grantees must timely monitor the organizations, activities, and expenditures of their subgrantees to ensure:

(a) Compliance with grantee's grant agreement and program rules and requirements; and

(b) Achievement of performance goals.

(2) Grantees must have a stand-alone policy and/or procedure that identifies the following:

(a) An evaluation of each subgrantee's risk (risk assessment), including any non-compliance with rules or regulations, and a review of the terms and conditions of the applicable subaward to identify risk and determine the appropriate level and type of subgrantee monitoring;

(b) The frequency of subgrantee monitoring, which must be at least once during a biennium or the term of the grantee's grant agreement (if

contracting annually, monitoring must occur at least once within the biennium in which SSP funds were awarded to the grantee);

- (c)** The number of relevant samplings of fiscal transactions per program;
- (d)** The number of relevant samplings of participant files, and that such review includes eligibility, notification, and documentation;
- (e)** The number of relevant samplings of HMIS entries to ensure appropriate entry and tracking of participant information and service transactions;
- (f)** A review of subgrantee records related to any equipment purchases to ensure compliance with the Fixed Assets/Equipment requirements as outlined in this manual (subgrantees cannot purchase vehicles with SSP funds);
- (g)** A review of participant records to ensure compliance with security, maintenance, retention, and destruction of records; and
- (h)** A review of subgrantee policies and procedures, forms, documents, and notifications to ensure compliance with all program, state, and federal rules, regulations, and requirements.

OHCS reserves the right to require modifications to any policy or procedure that, in its determination, does not meet basic principles or requirements of such a policy/procedure.

- (3)** Grantees must maintain documentation of their subgrantee monitoring, including:
 - (a)** A legally binding document that complies with the requirements of the grantee's OHCS grant agreement;
 - (b)** Documentation of the non-profit status of the subgrantee;
 - (c)** Copies of all the subgrantee audits performed under the requirement of 2 CFR Subtitle B with guidance at 2 CFR, Part 200, as well as applicable supplemental regulations, if the subgrantee is required to have such an audit;
 - (d)** Documentation of follow-up that the subgrantee takes timely and appropriate action on all deficiencies pertaining to the award as detected through audits, on-site reviews, and other means;
 - (e)** A risk assessment of the subgrantee organization, including an evaluation of each subgrantee's risk of non-compliance with rules,

regulations, and terms and conditions of any applicable subaward to determine the appropriate level and type of subgrantee monitoring;

- (f) A review of financial and performance reports, along with review of a sampling of fiscal transactions;
- (g) A review of subgrantee policies and procedures, forms, documentation, and participant records, including eligibility, notifications, and documentation;
- (h) A review of subgrantee asset inventory and equipment purchases;
- (i) A review of participant records to ensure compliance with security, maintenance, retention, and destruction of records; and
- (j) Follow-up on all deficiencies related to any SSP funding in accordance with all program rules and regulations.

xiii) Grantee and Subgrantee Grievance System

Purpose: To establish a formal grievance system to review, track, and mediate disputes between SSP Program Provider subgrantees and Regional Coordinator grantees.

Note: The grievance system may not issue orders or otherwise adjudicate disputes.

This OHCS process is to provide support for Regional Coordinators and Program Provider subgrantees where disputes have been unresolvable through established channels. Note that this process does not replace or supersede legally binding agreements, statute or administrative rule, nor provide binding orders or resolutions.

- (1) Prior to submitting a formal request for support, SSP Program Provider and/or SSP Regional Coordinator (Relevant parties) must have made a reasonable attempt(s) at reaching a resolution without OHCS involvement. Such attempt(s) must be documented and maintained by the SSP Regional Coordinator. If no resolution is reached between SSP Program

Provider and SSP Regional Coordinator, the request for support can be submitted at the following link: [INSERT SMARTSHEET LINK HERE](#)

- (2) OHCS will respond to any submission within 5 business days and may request additional information and/or schedule a discussion.
- (3) No later than 30 business days after initial submission of the request for support, OHCS will provide a written support summary to relevant parties.
- (4) OHCS will maintain a detailed tracking system for all disputes. This tracking system will include, at minimum:
 - (a) Request for support submissions
 - (b) Meeting minutes from any discussions with relevant parties
 - (c) Written support summaries
 - (d) Contact information for relevant parties and OHCS staff involved

xiv) Exit and Separation from Services Policy

It is the policy of OHCS to require of its SSP grantees and subgrantees the development of a trauma-informed and culturally responsive policy establishing standards and processes in the event of a participant's exit and separation from services. This policy requirement applies to any SSP grantee and subgrantee providing direct services to participants. The policy must, at a minimum, include the following:

- (1) Grantees must maintain clear, documented guidelines and expectations around activities and behavior that may result in an involuntary exit from shelter and separation from services. Participants must be informed of these guidelines and expectations at the point of intake/ program entry;
- (2) Grantees must maintain clear, documented guidelines and expectations around any potential trespass or timebound service restrictions extending beyond one night. Participants must be informed of these guidelines and expectations at the point of intake/ program entry;
- (3) Any measure restricting a participant's ability to access services should be taken only as a last resort in the most serious cases to protect the health, safety, and respect of participants and staff;
- (4) In the case of an involuntary exit from shelter or separation from services, grantees must inform participants of their right to appeal, including who to

contact regarding an appeal and information about the appeal process (see also Grievance/Appeals in this manual);

- (5) Grantees must maintain documentation of any exit and separation of services within the participant file, including any steps or actions leading up to the decision that were taken to avoid exit and separation from services; and
- (6) Grantees must conduct regular evaluations of available program data to ensure exit and separation from services decisions do not disproportionately impact Black, Indigenous, and People of Color, and other people from historically underserved communities.

xv) Low-Barrier and Non-Exclusionary Services Policy

Grantees and subgrantees must have a written, stand-alone policy and/or procedure for low-barrier and non-exclusionary services for shelters and Safe Temporary Emergency Placement Sites (STEPS). Sites funded through SSP must have a policy that allows homeless individuals and households to access shelter and services without preconditions.

Low-barrier and non-exclusionary sites must be prioritized under SSP. Grantees must ensure that at least 70% of regional shelter/STEPS operations funding is used for low-barrier and non-exclusionary services. A maximum of 30% of regional shelter/STEPS operations funding may be used on recovery-based sites.

Low-barrier and non-exclusionary sites must allow homeless individuals and households to access shelter and services without preconditions. These sites must focus on assessment and triage and intentionally link to permanent housing resources so that people move to housing quickly when resources allow.

To be a low-barrier and non-exclusionary site, the following conditions must be met:

- (1) Sobriety, treatment, and participation in case management services is voluntary;
- (2) Low-barrier and non-exclusionary sites may establish requirements that limit the use of drugs and alcohol in common or shared areas of the facility and may establish behavioral expectations that limit disruptive or violent behavior resulting from intoxication; however, the requirement to abstain

completely from alcohol or drug use is not a characteristic of low-barrier shelters/STEPS;

- (3) No documentation of identification, custody, citizenship, or gender is required. Shelters must meet the U.S. Department of Housing and Urban Development's (HUD) Equal Access Rule, [81 FR 64763](#), to ensure services are available to all individuals and families regardless of sexual orientation, gender identity, or marital status;
- (4) Sites accommodate service animals and make reasonable accommodations for belongings. On-site accommodations for pets whenever possible but not required. Accommodations and costs for boarding pets are allowable at the discretion of the grantee or subgrantee;
- (5) No charge to individuals or families for stays, meals, or services rendered; and
- (6) People with criminal convictions, poor credit, or eviction histories are not excluded. Youth, family, and domestic-violence shelters and STEPS may establish requirements that limit access to individuals with a history or record of prior sex offenses. In limited cases, low-barrier and non-exclusionary shelters and STEPS that do not target domestic-violence support, youth, or families may establish requirements that limit access to individuals with a history or record of prior sex offenses.

xvi) Recovery-Based Sites

Recovery-based shelters and STEPS are sites that require sobriety or drug and alcohol treatment but otherwise meet the definition of low-barrier sites and meet the unique needs of people in recovery from drugs and/or alcohol.

To be a recovery-based site, the following conditions must be met:

- (1) Sobriety or drug and alcohol treatment is required;
- (2) Access and services are available to participants in recovery from drugs and/or alcohol;
- (3) No documentation of identification, custody, citizenship, or gender is required. Shelters must meet HUD's Equal Access Rule, [81 FR 64763](#), to ensure services are available to all individuals and families regardless of sexual orientation, gender identity, or marital status;
- (4) Sites accommodate service animals and make reasonable accommodations for belongings. On-site accommodations for pets whenever possible but not required. Accommodations and costs for

boarding pets are allowable at the discretion of the grantee or subgrantee;

- (5) No charge to individuals or families for stays, meals, or services rendered; and
- (6) People with criminal convictions, poor credit, or eviction histories are not excluded. Recovery-based sites may establish requirements that limit access to individuals with a history or record of prior sex offenses.

c) Eligible Shelter Types, Safe Temporary Emergency Placement Sites (STEPS), Habitability, & Services Requirements

All shelters, whether basic overnight or housing focused, must meet the shelter standards outlined in [24 CFR § 576.403](#) at a minimum, regardless of whether 24 CFR § 576.403 independently applies to such shelters apart from the SSP. Grantees and subgrantees must document how habitability requirements are being met for all shelter types funded by the SSP. OHCS will provide technical assistance as reasonably requested to support compliance with habitability requirements. Note: For the purposes of SSP program delivery, STEPS are not considered shelters and have their own requirements as described below.

i) Shelter

"Shelter" means a congregate or non-congregate facility designed to provide temporary living arrangements for individuals and families experiencing homelessness. Additional standards not specified in 24 CFR § 576.403 but applicable to any SSP-funded shelter include:

- The ability to close and lock a door (applies to basic free-standing structures only);
- Food preparation facilities onsite or meals provided to participants;
- Restroom and shower facilities onsite; and
- Hard-surface walls, floors, and roofing.

A basic free-standing structure or cluster of basic free-standing structures may be considered Shelter if it meets all of the shelter standards as outlined in this program manual.

(1) Basic Overnight Shelter (HMIS Project Type: Emergency Shelter – Night-by-Night) means a shelter intended to keep participants safe and out of the elements. Basic Overnight Shelters must meet all shelter standards as outlined in this program manual, but are not required to offer housing-

focused case management and supportive services. Examples of Basic Overnight Shelter include:

- Inclement weather shelters;
- Other overnight only shelters or night-by-night shelters; and
- Hotel/motel vouchers as a means of providing shelter.

(2) Housing Focused Shelter (HMIS Project Type: Emergency Shelter – Entry Exit)

means a shelter intended to keep participants safe and out of the elements and to provide housing-focused case management and supportive services that assist participants in exiting homelessness into a stable housing destination. Housing Focused Shelters must meet all general shelter standards as outlined in this program manual, as well as the following additional minimum requirements:

- The facility is accessible to participants throughout the day and night, seven days a week, and during all seasons and weather;
- An individualized housing service plan (IHSP or comparable plan) must be completed and included in the participant file. If a participant exits the shelter before completing an IHSP, a note explaining the reason for omission should be included in the participant file; and
- The program provides housing-focused case management and supportive services that assist participants in exiting homelessness into a stable housing destination.

ii) Safe Temporary Emergency Placement Sites (STEPS) HMIS Project Type: Street Outreach

“STEPS” refers to vehicular camping and basic free-standing structure programs that do not meet all the shelter standards outlined in this manual, but provide Participants with a place to stay either in their vehicle or in a basic free-standing structure provided by the site when available, that is secure and free from ticketing. Grantees and subgrantees must document how they meet habitability requirements for all STEPS funded under the SSP. OHCS will provide technical assistance as reasonably requested to support compliance with habitability requirements. STEPS must include the following minimum requirements and standards of habitability, amenities, and services:

- Site management plan, including waste management and safety/ security of the site and its participants, staff, and volunteers;

- Garbage and sanitation services, including restrooms onsite and access to shower facilities;
- Potable water availability onsite;
- Access to electricity onsite and adequate lighting;
- Food access plan, which may include community coordination and referrals to local resources;
- Severe weather response strategy, for when vehicles or basic free-standing structures are not adequate to keep participants safe during a severe weather event; and
- For basic free-standing structures only: hard-surface floors, weather-proofing, and the ability to close and lock a door.

Note: Please refer to the "Definitions" section of this manual for additional information on terms used in the above section.

d) Regional Coordination, Assessment & Plan Requirements

i) Regional Coordination

Grantees must participate in a regional coordination process to administer SSP funds. Grantees are selected to participate in the regional coordination process through a request for application process. Grantees must establish agreements with subgrantees that meet the requirements of ORS 458.610(6). These agreements must be established before subgrantees can provide SSP services in their corresponding service area.

Grantees and subgrantees must administer programs in accordance with the policies and guidance in this manual as well as the terms and conditions of any SSP grant agreements.

Grantees must submit a regional plan and assessment in accordance with OHCS requirements.

ii) Regional Assessment and Plan

Grantees must submit a regional assessment and plan as required by OHCS. The regional assessment and plan must detail the services and outcomes planned for their region that will be supported by SSP. This process must involve collaboration with planning partners.

The regional assessment and plan must be updated and provided to OHCS every two years and is subject to OHCS' approval.

Grantees must identify and receive OHCS approval for all subgrantees through the regional plan. For any additional subgrantees, changes to subgrantees or removal of subgrantees outside of the regional plan, grantees must notify OHCS in writing and receive approval.

(C) Participant Eligibility

a) Household Composition

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

b) Housing Status

Households accessing SSP-funded programs and services must meet one of the following categorical definitions of homelessness:

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

1. Has a primary nighttime residence that is a public or private place not meant for human habitation; or
2. Is living in a publicly or privately operated shelter designated to provide temporary living arrangements (including congregate shelters, transitional housing, and hotels and motels paid for by charitable organizations or by federal, state and local government programs); or
3. Is exiting an institution where they have 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.*

i) Category 2: Imminent Risk of Homelessness

Individual or family who will imminently lose their primary nighttime residence provided that:

1. Residence will be lost within 14 days of the date of application for homeless assistance;
2. No subsequent residence has been identified; and
3. The individual or family lacks the resources or support networks needed to obtain other permanent housing.

Note: Includes individuals and families who are within 14 days of losing their housing, including housing they own, rent, are sharing with others, or are living in without paying rent.

ii) 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, but who:

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

iii) Category 4: Fleeing/ Attempting to Flee Domestic Violence

Any individual or family who:

- (1)** Is fleeing, or is attempting to flee, domestic violence;
- (2)** Has no other residence; and
- (3)** Lacks the resources or support networks to obtain other permanent housing.

Note: "Domestic violence" includes dating violence, sexual assault, stalking, and other dangerous or life-threatening conditions that relate to violence against the individual or family member that either takes place in, or has them afraid to return to, their primary nighttime residence (including human trafficking).

- c) * Addendum to Category 1 definition, as it pertains to eligibility for accessing SSP-funded programs and services: An individual or family exiting an institution into a place not meant for human habitation is eligible to receive SSP-funded programs and services, regardless of their housing status prior to entering the institution.**

d) Income

There is no income eligibility requirement for the SSP when accessing basic services. This guidance applies only to SSP funded programs.

e) U.S. Citizenship

There is no participant United States citizenship requirement to be eligible for SSP-funded assistance.

f) Oregon Residency

SSP-funded services and programs must be provided within the state of Oregon.

If a household's documented housing status is Category 4, Fleeing/Attempting to Flee Domestic Violence, SSP funds can be used for eligible costs associated with moving out of Oregon to a safe location, provided there is documentation in the participant's IHSP or comparable plan confirming the destination as a safe housing option. No SSP funds can be used for rent, hotel/ motel, utilities, or other services outside Oregon. Allowable costs are restricted to moving costs.

OHCS does not require strict adherence to grantees or subgrantees' service area boundaries. Participants may start intake and assessment with one grantee or subgrantee and then find housing or move to another grantee or subgrantee's service area. OHCS recommends coordination or a soft hand-off between grantees and subgrantees to meet participant needs and continue support. Roles and responsibilities should be clearly identified to effectively support the participant.

(D) Allowable Program Components and Costs

a) General Guidance There are financial limits on how SSP funds can be allocated. Below are the minimum and maximum funding requirements for each category:

- At least 50% of the SSP award must be spent on Shelter Operations. Details on Shelter Operations can be found below in Section D; and
- No more than 15% of the SSP award can be spent on Capacity Building. Details on Capacity Building can be found below in Section F.

Grantees must engage with coordinated entry (CE) systems whenever possible.

b) Street Outreach

SSP funds can be used for street outreach services to reach unsheltered homeless households, connect them with emergency shelter, housing, or critical services, and provide urgent, non-facility-based care.

Street outreach involves going outside of the organization to connect with households to build rapport and engage meaningfully with unhoused people. This includes assessment, eligibility screening, and case management to help them obtain safe and permanent housing. Street outreach includes connecting with people experiencing homelessness who may be disconnected or alienated

from supports and services, and is focused on moving people into permanent housing without preconditions for receiving assistance.

OHCS encourages using multi-disciplinary approaches and partnerships with culturally responsive, healthcare-focused, or other specialty outreach services. Leveraging various fund sources to pay for health services, such as through Medicaid, should be explored whenever possible. Health professionals providing specialty outreach services must have proper credentialing and licensure through relevant governing bodies (e.g., Oregon Health Authority, Mental Health and Addiction Certification Board of Oregon, etc.).

i) Requirements for Street Outreach

- (1)** Employ engagement strategies focused on building rapport;
- (2)** Includes basic assessment of needs that engages with the individual or household to get an understanding of factors related to immediate health and basic needs, vulnerabilities, and risks, and any other related factors. The basic assessment does not necessarily need to be a formalized assessment tool and completing an assessment tool (such as coordinated entry assessment) is not a precondition for receiving street outreach services.
- (3)** Works toward connecting participants with local (CE) systems and as a means of connecting participants to available permanent housing opportunities, if participant has this need. If participant agrees, this will include completing a CE assessment or referring them for a CE assessment/enrollment.
- (4)** Ensure services are person-centered, trauma-informed, culturally responsive and meet requirements of non-discrimination guidelines;
- (5)** Provide appropriate training for staff, covering at least the minimum training requirements identified in the “Training” section of this manual;
- (6)** Use of street outreach funds to provide street outreach consumable purchases, commonly referred to as basic needs supplies (e.g., food, tarps, sleeping bags, clothing, blankets, tents, toiletries, etc.) to non-participants as a means of building rapport and encouraging program participation;
- (7)** Consumable Purchases must be delivered to the non-participants where they are at and does not require them to travel or use a voucher or gift card to obtain the item. The goal must be the connection to permanent housing and grantee/subgrantee must utilize donations and other available resources for obtaining these consumable supplies prior to using state funds. Efforts to obtain these consumable supplies outside of using

state funds must be documented and such document must be available to OHCS, upon request, or the grantee/subgrantee must be able to articulate appropriate measures taken that align with OHCS' intent identified in this manual. Consumable purchases must meet the intent of street outreach, which is to build rapport sufficiently so that the homeless person(s) receive(s) an assessment, eligibility screening, and case management as a participant (see definitions section) to assist them in obtaining permanent housing.

(8) Limit the use of SSP funds when other donations or resources are not available. Once a person is a participant, they no longer receive street outreach services and are entered into other eligible categories for financial assistance and SSP services. Grantees and subgrantees may track the distribution of consumable purchases to homeless individuals through an HMIS service transaction; and

(9) Enter all street outreach events and services into HMIS.

ii) Allowable Costs for Street Outreach including:

(1) Assessment, enrollment, and data entry – conducting an initial assessment of participant basic needs and eligibility, conducting a CE entry assessment and data entry into HMIS;

(2) Street outreach consumable purchases (see requirements above);

(3) Providing crisis counseling;

(4) Assessing emergent health, behavioral, and mental health needs and connecting or referring participants to these services;

(5) Collaborating with health, behavioral, and mental health service providers to connect with street outreach households in the field;

(6) Connecting street outreach households to appropriate shelter services where basic needs can be met, such as access to showers, laundry, food services, and other shelter resources and services;

(7) Organizational costs for hosting Homeless Connect events;

(8) Marketing and outreach costs, including written materials, translation, and interpretation services (promotion and marketing must be program-

specific to SSP and cannot be for general promotion or marketing of the organization or emergency assistance in general);

- (9) Cell phone costs for outreach workers; and
- (10) Travel expenses incurred by outreach workers or in conjunction with outreach workers, social workers, medical professionals, or other service providers during the provision of allowable street outreach services.
- (11) Data entry expenses

iii) Unallowable Costs for Street Outreach including:

- (1) Cash gift cards, or cash-equivalent funds provided to participants;
- (2) Use of vouchers or gift cards/cash equivalents;
- (3) Stipends or direct payments to individuals for any purpose;
- (4) Personal solar or other powered generators;
- (5) Over the counter medication; and
- (6) Phone purchases for individuals.

c) Housing Focused Activities

Housing focused activities are those that directly connect participants to critical resources and services that support participants moving into a stable housing destination.

i) Requirements for Housing Focused Activities

- (1) The housing focused activity category must support participants who are using SSP services;
- (2) This category is not intended for homelessness prevention; and
- (3) An IHSP or comparable plan must be completed and included in the participant file if housing focused activity funding is used.

ii) Allowable Costs for Housing Focused Activities including:

- (1) Rental housing costs such as:
 - First month, last month, pet rent/deposit;
 - Rental arrears

- Manufactured home rental space ("lot rent") if used for primary housing;
 - Forward rent if accepted by a landlord as an incentive;
 - Security deposit; and
 - Application fees.
- (2)** Utility deposits, payments, and arrears (including water, sewer, garbage, gas, electricity, phone, and internet);
- (3)** Moving costs (including storage, van/ truck rental, and one-time purchase of move-in necessity basics);
- (4)** Housing focused transportation costs such as bus/ train passes, gas vouchers, and rideshare/ cab fares;
- (5)** Housing focused case management costs such as:
- Assessment and development of IHSPs or comparable plans;
 - Housing search and placement;
 - Coordinating other resources essential to obtaining and retaining housing;
 - Conducting follow-up and re-evaluation; and
 - Staffing costs; and
- (6)** Housing navigation staffing costs
- (7)** Data entry expenses

(D) Shelter Operations

Shelter Operations are those costs associated with maintaining and operating shelter facilities whose primary purpose is to provide shelter to the general homeless or specific populations of the homeless.

iii) Requirements for Shelter Operations

- (1) At least 50% of the total SSP award must be used for shelter operations;
- (2) Grantees using shelter operations funding must meet the low-barrier requirements outlined in the “Low-Barrier and Non-Exclusionary Services Policy” section of this manual;
- (3) Grantees must have an animal policy to ensure the safety and welfare of all participants and animals. This policy must be available to OHCS upon request. Animal policy should distinguish between Pet (If pets are accommodated onsite) and Service Animal, and must align with The Americans with Disabilities Act (ADA) requirements: [Service Animals | ADA.gov](#)

iv) Allowable Costs for Shelter Operations including:

- (1) Lease or rent payments for the shelter facility;
- (2) Utilities (includes water, sewer, garbage, gas, electricity, internet, and phone) for the shelter facility;
- (3) Security equipment or services for the shelter facility;
- (4) Janitorial supplies and services for the shelter facility;
- (5) Facility management (staff costs for a facilities manager to manage day-to-day operations necessary to support the shelter's needs and core function);
- (6) Minor maintenance/ repairs to the shelter facility:
 - Reference [Emergency Shelters: Distinguishing Between Renovation/ Conversion and Maintenance Activities](#) for clarification between eligible maintenance/repair costs and ineligible renovation/ conversion costs.
 - For activities beyond maintenance/ repair that meet the definition of minor/major rehabilitation and are essential to maintain shelter operations, **prior written approval from OHCS is required;**

- (7)** Furnishings necessary for the operation and maintained bed capacity of the shelter facility;
- (8)** Food for shelter facility settings;
- (9)** Costs to board and care for shelter participants' animals, such as boarding costs, kennels, leashes, food, toys, veterinary services not available or inaccessible within the community (such costs must be limited and reasonable);
- (10)** Shelter site staff costs including but limited to:
 - Security;
 - Mental health services; and
 - Behavioral health services;
- (11)** Hygiene supplies for shelter participants;
- (12)** Laundry supplies and laundry vouchers for shelter participants;
- (13)** Equipment purchases that are necessary for day-to-day shelter operations, including but not limited to:
 - ADA upgrades;
 - Kitchen equipment;
 - Portable toilet/ shower equipment; and
 - Storage;
- (14)** Bed bug treatment equipment/ services;
- (15)** Transportation costs for shelter participants; and
- (16)** Shelter operation costs listed above as they apply to day centers and drop-in service centers.
- (17)** Data entry expenses

v) Unallowable Costs for Shelter Operations including:

- (1)** Housing payments, deposits, or arrears for shelter participants;
- (2)** Utility deposits, payments, or arrears for shelter participants;
- (3)** Moving costs for shelter participants; and
- (4)** Operation costs for STEPS sites.
- (5)** Acquisition

d) STEPS Operations

“Safe Temporary Emergency Placement Sites (STEPS)” operations cover the costs of operating programs that provide participants with a safe place to stay either in their vehicle, or in a basic free-standing structure provided by the site when available. STEPS must be secure, free from ticketing, and meet the SSP requirements outlined below.

i) Requirements for STEPS Operations

- (1)** STEPS must be free from ticketing for SSP participants;
- (2)** Grantees must follow the low-barrier requirements outlined in the “Low-Barrier and Non-Exclusionary Services Policy” section of this manual; and
- (3)** Grantees must have an animal policy to ensure the safety and welfare of all participants and animals. This policy must be available to OHCS upon request. Animal policy should distinguish between Pet (If pets are accommodated onsite) and Service Animal, and must align with The Americans with Disabilities Act (ADA) requirements: [Service Animals | ADA.gov](#)

ii) Allowable Costs for STEPS Operations

- (1) Lease or rent payments for STEPS;
- (2) Utilities (includes water, sewer, garbage, gas, electricity, internet, and phone) for STEPS;
- (3) Security equipment or services for STEPS;
- (4) Janitorial supplies and services for STEPS;
- (5) STEPS management (staff costs for a STEPS manager to manage day-to-day operations necessary to support the STEPS' needs and core function);
- (6) STEPS site staff costs including but limited to:
 - Security;
 - Mental health services; and
 - Behavioral health services;
- (7) Equipment purchases that are necessary for day-to-day STEPS site operations, including but not limited to:
 - ADA upgrades;
 - Kitchen equipment;
 - Portable toilet/ shower equipment; and
 - Storage;
- (8) Minor maintenance/ repairs to STEPS:
 - Reference for clarification between eligible maintenance/ repair costs and ineligible renovation/ conversion/ costs.
 - For activities beyond maintenance/repair that meet the definition of minor/major rehabilitation and are essential to maintain STEPS operations, **prior written approval from OHCS is required.**
- (9) Costs to board and care for STEPS participants' animals, such as boarding costs, kennels, leashes, food, toys, veterinary services not available or

inaccessible within the community (such costs must be limited and reasonable);

- (10) Hygiene supplies for STEPS participants;
- (11) Mobile shower units or access to showers;
- (12) Portable toilets or access to toilet facilities;
- (13) Potable water system installation and maintenance;
- (14) Laundry supplies and laundry vouchers for STEPS participants;
- (15) Electricity installation and maintenance;
- (16) Warming and cooling units;
- (17) Meals and refrigeration equipment;
- (18) Hygiene supplies for STEPS participants;
- (19) Towing services for abandoned or inoperable vehicles at the STEPS;
- (20) Fire suppression; and
- (21) Costs to remove barriers to meet the habitability standards necessary to be considered shelter under 24 CFR § 576.403.

iii) Unallowable Costs for STEPS Operations including:

- (1) Tents;
- (2) Housing payments, deposits, or arrears for STEPS participants;
- (3) Utility deposits, payments, or arrears for STEPS participants;
- (4) Moving costs for STEPS participants; and
- (5) Operation costs for shelter facilities.
- (6) Acquisition

e) Capacity Building

Capacity building covers costs that help grow, develop, and increase the ability to support SSP services for people experiencing homelessness. It also includes strengthening community efforts and providing technical assistance for grant administration, best practices, system design, and other important areas.

i) Requirements for Capacity Building

No more than 15% of the SSP award can be spent on capacity building.

ii) Allowable Costs for Capacity Building include:

- (1)** Training for staff or community partners to develop skills related to addressing homelessness;
- (2)** Technical assistance, including fiscal training, grant management support, policy refinement and development, strategic planning, and improving data collection methods;
- (3)** Establishing or expanding outreach to identify resources, avoid service duplication, cultivate new partnerships and relationships, including with organizations that identify as culturally responsive or culturally specific, and create seamless service pathways;
- (4)** Increasing organization staffing; and
- (5)** Training, support, and continued education for HMIS and coordinated entry.
- (6)** Costs to develop and coordinate grantee's regional plan and assessment.

iii) Unallowable Costs for Capacity Building including:

- (1)** Direct assistance to SSP or shelter participants; and
- (2)** Shelter facility or STEPS operations costs.

(E) Financial Management

a) Fiscal Standards

These fiscal standards ensure that grantees and their subgrantees have accurate, transparent, and appropriate fiscal controls. Technical assistance regarding these standards can be provided by OHCS when requested by the grantee:

- i)** Charge administrative duties (executive leadership) to "Admin," and never to "Program;"
- ii)** Do not charge salary and fringe benefits to least restrictive funding. Allocate proportionately to all activities performed;
- iii)** Costs must be allocated to the appropriate grant according to the cost allocation plan and 2 CFR 200. Costs cannot be allocated to a grant just

because there are funds available in that grant if the costs are not related to the grant;

- iv)** Follow and ensure understanding of fiscal and procurement policies and procedures;
- v)** Support the procurement process with adequate documentation of decisions;
- vi)** Do not establish long-term contracts without term dates or review processes;
- vii)** Explain errors in bank records and avoid moving funds between accounts to prevent insufficient funds;
- viii)** Avoid numerous correcting entries in the general ledger;
- ix)** Ensure the accounting system used provides prompt and timely reporting of transactions;
- x)** Have a written and adequate cost allocation plan that includes all activities and identifies included and excluded costs for an indirect cost rate. This plan must be available for monitoring;
- xi)** Have a documented base for allocating costs;
- xii)** Ensure adequate documentation supports all costs charged to the SSP;
- xiii)** Ensure costs allocated to a grant can be charged to that grant;
- xiv)** Ensure travel costs are adequately documented and support business purposes;
- xv)** Do not have one individual responsible for determining cost allowability, cost allocation, and monitoring activities (ensure appropriate separation of duties);
- xvi)** Reconcile bank statements monthly and ensure different individuals reconcile and approve the reconciliation (appropriate separation of duties). Ensure appropriate oversight and risk mitigation;
- xvii)** Do not modify documents after management approval (such as timesheets or invoices); and
- xviii)** Establish an internal process for reviewing compliance with grant requirements.

b) Advance Requests for Funds

OHCS is mindful of grantees' operational needs and cash flow in delivering this critical program. OHCS expects grantees to invoice for expenses as reimbursements, but advance payments can be requested in rare cases. These requests must minimize the time between the disbursement and expenditure of funds. Grantees must have financial management systems that meet fund control and accountability standards. Advance requests are subject to OHCS approval and are at OHCS' sole discretion. Requirements for advance requests include:

- i) Limiting advance requests to the minimum amount needed and be timed to be in accordance with the actual, immediate cash requirements;
- ii) Ensuring the timing and amount of advance payments are as close as possible to the actual expenditure of funds for allowable costs;
- iii) Making timely payments to contractors and subgrantees in accordance with any contract or grant provisions;
- iv) Use the "Projected" field in OPUS on the Agency Grant Request (AGR) screen to request an advance. Justify the need by stating, "see attached" in the AGR "Comment" field and including an "Advance Request for Funds" form. This form must provide details to justify the request and demonstrate the impact to grantee's operations and cash flow; and
- v) Fully expend and reported advanced funds in a subsequent request for funds (general ledger submitted in OPUS through a request for funds) before requesting additional funds.

For additional questions or to discuss operational and cash flow needs, contact the OHCS grant administrator or OHCS via email at HSD.HomelessServices@hcs.Oregon.gov.

c) Use of OPUS

The OPUS System is a web-based centralized data system for business-processing needs. Grantee staff must complete training before being authorized to use OPUS. Access is limited to business needs. Training can be provided by OHCS, and a video replay of OPUS Fiscal Training is available on the Homeless Services Section (HSS) Dashboard:

<https://app.smartsheet.com/b/publish?EQBCT=8a215621578a4f76ae98113d719d5e64>

OHCS maintains an OPUS user manual and an OPUS help desk. You can view the OPUS user manual from the OPUS landing page under the "Help" tab after logging in. This manual includes detailed information on notices of allocations, requesting funds, submitting financial status reports, and more.

The OPUS help desk can be reached at:

Email: opushelp@hcs.oregon.gov

Phone: (503) 986-2099

Toll Free: (800) 453-5511, Option 6

d) Request for Funds Documentation

Grantees and subgrantees must retain supporting documentation for all costs charged to the SSP and provide evidence that grant funds were spent on allowable costs. Requirements for documentation include:

- i) When submitting an Agency Grant Request(AGR)/Request for Funds (RFF) in OPUS, upload documentation of the costs for which payment is requested. Requests without proper documentation will be voided and returned with instructions to resubmit;
- ii) Submit AGR/RFFs frequently and regularly to meet spending targets. This means at least once every 60 days; however, OHCS prefers and recommends submissions every 30 days. Failure to submit regularly may result in recapture of funds by OHCS; and
- iii) An AGR/RFF can be denied or voided if:
 - (1) Documentation is insufficient;
 - (2) Unallowable costs are included;
 - (3) Funds are drawn from the incorrect category; or
 - (4) The request is submitted after the grant close-out period.

e) Budget Change Requests

Changes to a grantee's budget can require a budget change request. All budget changes require OHCS approval by submitting a "Budget Change Request" form electronically to: mga.fiscal@hcs.oregon.gov. Requirements for budget change requests include:

- i) Budget changes will not be approved if they limit a grantee's ability to meet minimum percentage standards required for the SSP;
- ii) No budget change request will be approved if submitted within 10 calendar days of the grant's final Financial Status Report (FSR) due date (08/30), as

there is not enough time to process the request and draw the funds to meet the FSR timeline;

- iii) OHCS may require additional information for a budget change request, in a form and format specified by OHCS;

f) Funds Spenddown

Grantees are expected to fully expend grant funds during the grant's performance period. Manage expenditures so that services are available throughout the intended service delivery period. Any funds not drawn within 60 days after the funding period ends are subject to recapture or deallocation by OHCS. Exceptions are not guaranteed and must be requested before the 60-day deadline. Approval of exceptions is at OHCS's sole discretion. Requirements for funds spenddown include:

- i) Ensure expenditures are managed so services are available throughout the service delivery period;
- ii) Monitor expenditures monthly by grantee to ensure budget-to-actual amounts align with the percentages identified in the approved standard/Time-Bound Expenditure Plan(TBEP);
- iii) Any funds not drawn within 60 days after the funding period ends are subject to recapture or deallocation by OHCS; and
- iv) Exceptions must be requested before the 60-day deadline and cannot be due to late invoicing by subgrantees or lack of adequate staffing. Approval is at OHCS' sole discretion.

g) Internal Controls for Fraud

Grantees and their subgrantees must maintain an internal controls framework that meets OHCS standards and ensures compliance with program requirements. This includes having written, documented policies and procedures, which are subject to OHCS monitoring. Requirements for internal controls include:

- i) Establishing and maintaining clear policies and/or procedures for managing program applicants and participants who may have committed fraud, and

for handling public complaints about potential fraud. This includes preventing, detecting, investigating, and addressing fraud;

- ii) Establishing and maintaining clear policies and/or procedures for preventing, detecting, investigating, and addressing employee fraud;
- iii) Report all incidents of fraud to the OHCS grant administrator or to OHCS at hsd.homelesservices@hcs.or.gov; and
- iv) Grantees and subgrantees are responsible for repaying SSP funds to OHCS that were obtained through any act of fraud.

h) Purchases and Procurement

Purchases of equipment or property are subject to additional requirements. Grantees must ensure that their agreements with subgrantees include terms and conditions that address these requirements:

i) Fixed Assets (Equipment)

- Fixed assets valued at \$10,000 or more (including computer equipment, electronic equipment, photography equipment, hand tools, etc.) require pre-approval by OHCS before purchase. Purchases made without OHCS approval will be disallowed and SSP funds must be repaid;
- Requests for approval must be made using the form available on the HSS Dashboard;
<https://app.smartsheet.com/b/publish?EQBCT=8a215621578a4f76ae98113d719d5e64>
- Subgrantees must coordinate with their grantee to obtain OHCS' pre-approval for fixed asset purchases. It is the grantee's responsibility to obtain OHCS' pre-approval for any subgrantee's fixed asset purchase. OHCS will not accept requests directly from subgrantees;
- Title to all fixed assets, where titles are required, as defined in 2 CFR Part 200, purchased in whole or part with SSP funds must rest with the grantee, who must provide the OHCS grant administrator with a copy of the title after purchase; and

ii) Vehicles

- All vehicle purchases require pre-approval from OHCS. Subgrantees cannot use SSP funds to purchase vehicles;
- Requests for approval must be made using the form available on the HSS Dashboard;

<https://app.smartsheet.com/b/publish?EQBCT=8a215621578a4f76ae98113d719d5e64>

iii) Disposition of Assets

iv) Equipment and vehicle purchase approval must be made through the forms located on the HSS Dashboard.

- Disposal of items funded by the SSP with an original cost or current fair market value of \$10,000 or more requires pre-approval from OHCS;
- Requests for approval must be made using the Equipment Disposition Request form available on the HSS Dashboard;
- Proceeds from the disposal of any fixed asset or vehicle exceeding \$10,000 must be used for the intent and purpose from which the funds originated and used for allowable program expenses;
- Report theft or loss of fixed assets or vehicles purchased with SSP funds as a disposition request. Insurance claim proceeds must be used for the intent and purpose from which the funds originated and used for allowable program expenses. Documentation of expenditures made with insurance proceeds must be available during monitoring. Consult with an accountant or financial advisor for guidance on how to report insurance proceeds on financial statements;

v) Restrictions

- Items purchased with SSP funds cannot be used as collateral or to secure financing.
- Fixed assets and vehicles purchased with SSP funds cannot be donated or borrowed by another entity (2 CFR 200.434(a)); and
- Fixed asset and vehicle purchases are unallowable as an indirect cost (2 CFR 200.439(7) and 2 CFR 200.436.

vi) Contracting for Services

- Contractors must have recognized professional expertise, certification, licensure, registration, or stature in the relevant field;
- Contractors must be registered with the [Oregon Secretary of State](#) to do business in Oregon, as required by law;
- Obtain multiple bids or pricing quotes when OHCS approval is required for a purchase;

- Provide sufficient information on cost allocation principals in accordance with 2 CFR 200;
- Grantee must provide sufficient information, in OHCS' determination, to justify reasonableness and cost allocation of the purchase;
- If using a sole source contract, provide written justification documentation for not obtaining more options. All purchasing and contracting must comply with grantee's or subgrantee's own policies and procedures.

i) Program Income

Grantees and subgrantees must not charge any fees to applicants or participants to access SSP funds. Charging fees creates a disparate impact on disadvantaged populations and is not allowed. Income and interest generated from SSP funds are also not allowed, apart from the OHCS-approved sale of equipment or vehicle.

In accordance with 2 CFR 200.307, program income means gross income received by the grantee or subgrantee that is directly generated by an award-supported activity or earned as a result of an SSP award during the award period.

j) Administrative Costs

Grantees can retain and use up to 2% of the SSP funds allocated to subgrantees, for the grantee's administrative costs. Grantees who provide direct services can retain and use up to 8% of their direct service allocation for administrative costs.

Subgrantees can retain and use up to 8% of their SSP award for administrative costs.

Administrative costs include, but are not limited to:

- Senior executive management personnel costs;
- Administrative staff travel costs;
- General operating costs, such as accounting, budget, human resources, contracting, marketing, audit, and organization insurance;
- Board expenses (excluding meals);
- Organization-wide membership fees and dues specific to homeless systems and programs;

- Facility costs not directly related to shelter, such as rent, depreciation, operation, and maintenance; and
- Equipment rental or purchase, utilities not directly related to a shelter or STEPS, and information technology costs.
- Costs to develop and coordinate grantee's regional plan and assessment.

(F) Data, Submissions and Reporting Requirements

(A) Data Timeliness

Timely and accurate data entry is critical to ensuring meaningful data analysis and reporting. For all project types, grantees and subgrantees must enter data within three (3) business days after a service has been provided unless the local CoC HMIS policies/procedures requires more stringent timeliness. Project types, such as Emergency Shelter and Coordinated Entry may require more stringent data timeliness standards. Data not entered by the regular reporting deadline of the 20th of the following month will be considered out of compliance.

(B) Data Entry Requirements

HMIS Project Setup is an essential responsibility of Grantees and Subgrantees. Grantees and Subgrantees are required to work with their local CoC HMIS Administrator to adhere to the guidance and direction of OHCS staff when creating or modifying OHCS-funded projects in HMIS. Accurate configuration of projects during setup is necessary to ensure data entry and required reporting can be completed.

Project Setup and Grant ID: Each OHCS-funded project is assigned a specific Grant ID tied to the OHCS funding source, which is required for tracking and reporting purposes. More information on Provider Setup Standards with Grant IDs for each OHCS-funded program can be found in the NAME OF DOCUMENT/MANUAL or by contacting the OHCS HMIS team. [HERE \(link to document\)](#)

Project Type and Data Elements: HMIS project types are affiliated with specific services and therefore data collection requirements. For funding streams with multiple project types, each project type will have requirements specified on the Data Collection Requirements by Program and Project Type Dashboard on the OHCS website: [\[INSERT LINK TO HMIS Data Entry Requirements Dashboard\]](#).

Service Transactions: Each allowable service must be represented with a Service Transaction according to CoC Policy or OHCS data standards, whichever is more stringent. Same-day services will have the same Service Start and End Date. Service Transactions that utilize direct financial assistance, including all payments,

arrearages, deposits, fees, landlord engagement and client non-categorical services, must include a HMIS fund source and amount. More information about recording Service Transactions can be found in the NAME OF DOCUMENT/MANUAL or by contacting the OHCS HMIS team. [HERE \(link to document\)](#)

All allowable components require an HMIS entry/exit and HMIS service transactions in accordance with the Data Collection Requirements.

(C) Required Data Elements

- a) There are two types of data elements that need to be collected: Universal Data Elements and Program-Specific Data Elements.
- b) **Universal Data Elements:** These are data elements that must be collected for all programs. These elements are crucial for basic identification and demographic analysis.
- c) **Program-Specific Data Elements:** These are data elements specific to a particular program or project type. They are determined based on the unique requirements and objectives of each program.
- d) Specific data elements required can vary from one program to another. Grantees and Subgrantees should refer to the Data Collection Requirements for FY25-27 found on the HSS Dashboard ([Insert Link here](#))

e) Comparable Database

Violence Against Women Act (VAWA) and the Family Violence Prevention and Services Act (FVPSA) contains strong, legally codified confidentiality provisions that limit HUD-defined Victim Service Providers (VSPs) from sharing, disclosing, or revealing victims' personally identifying information (PII), including entering information into shared databases like HMIS. To protect participants, VSPs must enter participant-level data into a comparable database that is comparable to and complies with all HUD HMIS requirements and in accordance with OHCS or local CoC's HMIS policies/procedures. Grantees/subgrantees defined as HUD VSPs are still subject to reporting requirements to OHCS of the grant for which they receive OHCS funding even if using a comparable database; however, no PII will be shared, only aggregate counts.

VSP Data Reporting: OHCS Grantees are responsible for submitting all non-HMIS data reporting on behalf of VSP subgrantees to OHCS by the 20th of each month, aligning with standard HMIS data reporting.

- f) Submissions/Reporting Requirements** Program reporting is allowable as a Shelter Operations, Street Outreach, and/or Housing Focused Activities expense. It is critical that grantees meet deadlines for the submission of data, budgets, and reports (including, but not limited to annual, quarterly, implementation, and financial status reports, etc.) as required by OHCS. Grantees must submit complete and accurate materials requested by OHCS by the deadline provided by OHCS and in the form and format required. Any submission that is incomplete and/or does not provide accurate information or is submitted after the deadline will be considered by OHCS to be late and out of compliance with requirements. Failure to provide required data or reports can result in an audit finding in the Monitoring Report and other remedies as afforded in the OHCS Grant Agreement/Contract.

OHCS Grantees are responsible for ensuring all subgrantee data is reported to OHCS. Subgrantee reporting to grantee must occur timely, so that grantees can meet the required deadline for reports to OHCS. It is the grantee's responsibility to ensure that subgrantees provide information to the grantee as required so that grantees can meet the reporting requirements of OHCS inclusive of grantee information. Lack of compliance by a subgrantee in meeting reporting requirements does not provide an exception to, or reprieve of, the requirement for the grantee to report timely and accurately. At the discretion of OHCS, other reports can be required when deemed necessary by OHCS and grantees are subject to such requirement

Monthly System Query Report

Activities funded with this Grant must be included in the monthly disaggregated HMIS data using the SAP Business Objects (the HMIS reporting tool) System Query Report. Reports must be transmitted in a format and method as directed by Agency. Reports are due 20 days following the end of each month for the aggregate of work performed in the biennium through the end of the previous month.

Example 1: If System Query Report is run April 20th, 2026—the service range would be July 1, 2025-March 31, 2026.

Example 2: If System Query Report is run February 20th, 2027—the service range would be July 1, 2025-January 31, 2027

Biannual-Housing Inventory Count (HIC) Report.

Grantees will submit a biannual HIC Report (twice annually) to OHCS by February 20th and August 20th. HIC Report must identify and disaggregate

OHCS-funded beds/units and their utilization rates specifically. Reports must be transmitted in a format directed by Agency. Reports must be submitted to Agency's Grant Administrator and HCS.REPORTING@HCS.oregon.gov.

Annual System Performance Measure (SPM) Report.

Activities funded with this Grant must be included in the Annual SPM Report. Data for the Annual SPM Report can be found in the WellSky Community Services (ServicePoint) Report Module: System Performance Measures. Reports are due upon Agency's request, which will be after the SPM deadline in HUD HDX. Reports must be submitted to Agency's Grant Administrator and HCS.REPORTING@HCS.oregon.gov.

Subgrantee Report

OHCS Grantees are responsible for ensuring all subgrantee data is reported to OHCS. Subgrantees funded with this Grant, including subgrantee name, project name, HMIS project type, HMIS project ID, number of OHCS-funded shelter beds, populations served, activities funded, services provided, and other information as requested by Agency must be submitted within 10 business days of signing agreements with subgrantees. Grantee must notify Agency within 10 business days of any changes in subgrantees. Subgrantee information must be submitted through Agency's designated subgrantee reporting process.

Fiscal:

The AGS/FSR is due to OHCS by the 60th calendar day following the end of the fiscal year and must be submitted in OPUS within this timeline.

1. Records Requirements

Participant Files

Documentation of participant eligibility and services or funds expended on participants must be maintained in the participant files (paper or electronically). File documentation will be the basis of OHCS monitoring to ensure grantee and subgrantee comply with program requirements, rules, and regulations. OHCS recommends that grantees and subgrantees use a participant file checklist to ensure adequate documentation of case files.

Records Access

Grantees, their subgrantee organizations and subgrantee organization's subgrantees 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 records,

applicant/participant records 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 removal of records as necessitated by OHCS or their duly authorized representative.

Records Retention

Grantees, subgrantee organizations and subgrantee organization's subgrantees shall retain all program records pertinent to applicant/participant services and expenditures incurred 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:

(I)

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

Records can be stored electronically; however, electronic records must be maintained securely and confidentially and be available in paper format if requested by OHCS for monitoring, audit, or other purposes. HMIS can be used as a method of document collection and maintenance when it represents all required records and is appropriate.

Grantees, subgrantee organizations and subgrantee organization's subgrantees shall retain and keep accessible all such fiscal and program records, applicant/participant records, digital and electronic records, books, documents, papers, plans, and writings for a minimum of (6) six years, or such longer period as required by applicable law, whichever date is later. Defer to specific program operation manuals for any specific requirements for the duration of record keeping limits. Destruction of records must occur timely and in compliance with applicable law and retention schedules. Retention begins from the later of the date that final payment is made or from the termination of program funding, or until the conclusion of any audit, controversy or litigation arising out of, or relating to the program.

(G) Applicable Laws, Rules, and Regulations

This manual contains numerous references to various laws, rules, and regulations. For detailed information, refer to the following sources, which can change from time to time:

Laws – [Oregon Revised Statutes \(ORS\)](#):

- [ORS 456](#): Housing

Rules – [Oregon Administrative Rules \(OAR\)](#):

- OAR 813-275: Statewide Shelter Program

Regulations

- [HMIS Data Standards Manual](#)

(H) Definitions

The terms included in this section have the meanings provided below. They are listed in alphabetical order.

- Appeal means a formal contesting of any decision that terminates, denies, limits, reduces, or modifies a participant's SSP benefits for any reason
- Basic Free-Standing Structure means an alternative to traditional shelter that may meet either shelter criteria or STEPS criteria depending on features, standards, and amenities. These structures typically do not include a foundation, and are assembled with prefabricated parts and materials. Examples include: Pallet shelters, Conestoga Huts, yurts, and other tiny home models.
- Basic Overnight Shelter means a shelter intended to keep participants safe and out of the elements. Basic overnight shelters meet all shelter standards as outlined in this Grant, but are not required to offer housing-focused case management and supportive services. Examples include: inclement weather shelters, other overnight only shelters or night-by-night shelters; and Hotel/motel vouchers as a means of providing shelter.
- "Congregate Shelter" means a shelter involving shared living spaces where multiple people sleep in close proximity.
- "Continuum of Care" or "CoC" means a coordinated network of community-based programs and stakeholders that work together to prevent and end homelessness. The CoC ensures that services are client-centered, locally responsive, and aligned with broader state and federal goals to reduce homelessness
- Day Center/Drop In Services means a facility designed to provide services to individuals and families experiencing homelessness during specified daytime hours.
- Domestic Violence means dating violence, sexual assault, stalking, and other dangerous or life-threatening conditions that relate to violence against the individual or family member that either takes place in, or has them afraid to return to, their primary nighttime residence (including human trafficking).

- Domestic Violence Shelter means a shelter that specifically serves victims of Domestic Violence.
- Grievance means a written or verbal complaint initiated by a participant in situations where they feel their rights have been violated and/or they have received unfair treatment.
- "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 Focused Shelter means a shelter intended to keep participants safe and out of the elements and to provide housing-focused case management and supportive services that assist participants in exiting homelessness into a stable housing destination. Housing Focused Shelters must meet all general standards as outlined in the Program Manual.
- "Homeless Management Information System" or "HMIS" is defined in 24 CFR 576.2.
- "Homelessness" means lacking a fixed, regular, or adequate nighttime residence in accordance with the *Participant Eligibility, Housing Status* section of this manual.
- Low-Barrier means policies and shelters with minimal preconditions required to access services.
- "Non-congregate Shelter" means a type of shelter that provides private sleeping spaces.
- Participant means an individual who directly or indirectly receives services provided by Regional Coordinators or their subgrantee service providers. Participants are the end beneficiaries of the SSP's funding and support.
- Planning Partners includes shelter providers, local jurisdictions, housing authorities, community action agencies, Continuums of Care, day center service providers, rehousing services providers, county mental health providers, and coordinated care organizations.
- Rehabilitation means action taken to return a shelter property to a useful state by means of repair, modification, or alteration. Bringing a property to the point where it is usable, safe, comfortable, hygienic, and habitable, but not expanding or improving on the existing property.
- Safe and Temporary Emergency Placement Sites (STEPS) means vehicular camping and basic-free standing structure programs that do not meet all shelter standards outlined in this Grant, but provide Participants with a place

to stay either in their vehicle or in a basic free-standing structure provided when available, that is secure and free from ticketing.

- Shelter means a congregate or non-congregate facility designed to provide temporary living arrangements for individuals and families experiencing homelessness.
- Shelter Operations are those costs associated with maintaining and operating shelter facilities whose primary purpose is to provide shelter to the general homeless or specific populations of the homeless.
- "Street outreach" means services to reach unsheltered homeless households to connect them with emergency shelter, housing, or critical services, and provide urgent, non-facility-based care.
- Vehicular Camping means temporarily residing in a car, RV, camper, or trailer that the participant provides.

DRAFT

Oregon Housing and Community Services Statewide Shelter Program Engagement Summary: Key Design Issues and Developing the Request for Applications

Background

The Statewide Shelter Program (SSP) builds on Oregon's progress towards creating an effective homelessness response system. In July 2024, Governor Kotek's office and Representative Pam Marsh of Southern Jackson County convened the Sustainable Shelter Work Group to develop recommendations on implementing a coherent, effective, and sustainable statewide structure to support the existing shelter investments over the long term. The work group represented a coalition of state, city, and county government agency representatives, legislators, direct service providers and shelter operators, culturally specific organizations (CSOs), Community Action Agencies (CAAs), and Continuums of Care (CoCs). In December 2024, Governor Kotek and Representative Marsh provided the Oregon State Legislature's Legislative Policy and Research Office with the [Sustainable Shelter Work Group Report](#). This report detailed the recommendations of the shelter work group, focusing on the distribution of shelter funds, the types of shelters and services that the state should fund, and how data and technical assistance would further support outcomes of Oregon's shelter system. These recommendations underpin House Bill (HB) 3644, which directs Oregon Housing and Community Services (OHCS) to create a Statewide Shelter Program and select regional coordinators to administer funding to shelter providers in their region. HB 3644 also directs OHCS to adopt new rules to support this program. OHCS solicited feedback from stakeholders across the state to inform decision-making in creating an effective and sustainable shelter system that ensures access for all Oregonians needing shelter.

Engagement Objectives

OHCS designed a series of engagements to connect with key stakeholders, including the sustainable shelter work group, current shelter grantees, culturally responsive organizations, potential regional coordinators, and individuals with lived experience of homelessness. The goals of the engagements included:

- Soliciting feedback on key design issues to give those directly affected meaningful input in the development of Oregon Administrative Rules and program guidance for the Statewide Shelter Program. The topics were primarily driven by the requirements in HB 3644 to adopt specific rules, and included minimum requirements for shelter, shelter operations, minimum requirements for vehicular camping and basic freestanding structure programs, new policies on low-barrier and non-exclusionary shelters, new policies on exit and separation from shelter services, and funding formula.

- Request feedback on the development of a Request for Applications (RFA) to select regional coordinators. Topics included important qualities and experience regional coordinators should have, developing regional plans, grant applications, and insurance requirements.
- Ensuring broad awareness of the opportunity for the Shelter 25-27 biennium funding and proposed funding parameters.

Engagement Strategies

OHCS hosted four listening sessions on key design issues and one listening session on RFA development. Invitees included CAAs, multi-agency coordination groups (MACs), balance of state local planning groups (LPGs), shelter operators and passthrough entities, tribal government, public housing authorities (PHAs), culturally responsive organizations, and shelter work group members. Engagement sessions were tailored to the target audience and used existing meeting spaces when possible. A survey was offered for those wishing to provide anonymous feedback or those who were not able to attend a listening session (survey results are attached to this report as Appendix A). Those who were unable to attend a listening session or submit a survey before the deadline were offered the opportunity to email their feedback for consideration. Individuals with lived experience were engaged during a listening session with the Mental Health and Addiction Association of Oregon (MHAAO) at the 2025 Peerpocalypse Conference.

Partner Participation

Ninety-eight people participated in the listening sessions, and 60 surveys were completed. Partners from all 36 counties in Oregon participated in either the surveys or the listening sessions. Fifteen people with lived experience participated in Peerpocalypse – most session attendees had experienced homelessness within the last two years, including five participants who were currently homeless.

Overall Themes

One recurring observation was that as shelters are required to meet higher standards, they need more resources, infrastructure, and time to meet those standards. Participants also frequently noted that rural areas struggle with a lack of resources, including trained staff and shelter space, so they may need more help to be able to meet higher minimum requirements. Above all, listening session and survey participants emphasized flexibility so communities can creatively meet the needs in their local area with the resources that are available to them.

Participants also noted the importance of investing in staff to lower turnover, aid recruitment, and increase staff with lived experience and/or cultural competency. Participants largely agreed that funding staff training in case management, trauma-informed care, crisis management, conflict resolution, data collection, and cultural competency is important. Many participants with lived experience emphasized the need to increase staff levels to avoid staff burnout and ensure shelter guests can access case management services and increase peer support. Participants also wanted shelters to have more involvement with mental, behavioral, and physical health providers. Increasingly, shelters help guests with medical and disability-related

support needs, and accommodating these needs takes more staff time and resources, as well as relationships with or integration of health care providers. The lived experience participants said shelters need to provide more support with independent living skills such as budgeting, housing readiness, and workforce re-entry, as well as more support with addiction, mental health, and parenting skills.

Shelter Services and Operation Themes:

OHCS asked about service requirements for emergency shelters to create minimum standards for all OHCS-funded shelters across the state and asked participants for input on what shelter costs are needed to maintain and operate shelter facilities.

- It is important that shelters are clean places, with adequate trash removal, infestation control, and guest access to bathrooms, laundry, showers, first aid/medical care, clothing, and hygiene products. Keeping shelters habitable long term also requires paying for facility maintenance and repairs.
- Most participants noted that requiring access to food, as opposed to requiring kitchen facilities or meal service, would allow more flexibility for shelters, especially in rural areas where space and resources are lacking.
- There were mixed feelings about requiring pet access. Many noted that the fear of being separated from pets was a major barrier to getting folks into shelters. Others raised issues around pet health, pet fights, pet storage, and pet liability that made them hesitant to require pet access in all shelters.
- Insurance was a major concern for participants—both getting and keeping insurance has been difficult for shelters, and insurance costs have risen.

Vehicle Camping and Basic Freestanding Structure Themes:

OHCS asked about the minimum habitability standards and service requirements for vehicular camping and basic freestanding structure programs. These programs provide individuals experiencing homelessness with a place to stay, either in their vehicle or in a freestanding structure such as a Conestoga Hut, a yurt, or other structure provided by the site when available. These structures would be a new program type under the statewide shelter program.

- Accommodating vehicle camping or providing freestanding structures help more guests who would otherwise be unsheltered access shelter, but it is hard to get community support for placing these sites. It generally requires costly investments in infrastructure to be able to provide electricity, lighting, potable water, walkways and parking spots, shower and toilet access and RV waste disposal. Local jurisdictions may have additional zoning requirements that these shelters need to meet.
- Because these are temporary sites, it's important to offer the most immediately needed services like case management and housing navigation. Other important considerations for these sites include sanitation, adequate security, fire suppression, and a plan or resources for dealing with abandoned or disabled vehicles, as well as for operating during weather events like fires, extreme heat or freezing temperatures.

- Participants stressed the need for flexibility with this type of program, as it can be set up in a variety of ways and the ability to provide amenities depends on the setup and location.

Low Barrier Policy Themes:

HB 3644 requires OHCS to develop low-barrier shelter policies. OHCS asked participants about what practices or policies are most important for creating shelter spaces that are more welcoming and easier to access.

- Population-specific shelters are an important tool to provide both access and safety for everyone. Across all listening sessions, participants struggled with the question of how to operate a low-barrier shelter for folks with intersecting levels of vulnerability (families, children, DV victims, folks in recovery), specifically in reference to guests with convictions for violent crime or an active addiction.
- Communities need flexibility to provide a mix of intentionally designed shelter options to maximize guests' space, autonomy, and safety.
- Investing in shelter staff is important to shelter outcomes; optimally staff should receive training in trauma-informed care, de-escalation, cultural competency, and harm reduction, have lived experience, earn a living wage, and receive sufficient support to prevent burnout.

Shelter Exit Themes:

House Bill 3644 requires OHCS to create policies emphasizing equity in shelter exits and separation from services. OHCS asked participants what actions would improve equity in shelter exits.

- When asked about equity, several participants shared that their organizations currently have culturally responsive and trauma-informed care when setting program rules and procedures. However, most participants shared they are not currently using a racial equity lens to ensure termination policies do not disproportionately impact Black, Indigenous and people of color, and others from historically underserved communities. Several also shared they are not currently regularly evaluating shelter exit data to identify disparities.
- Successful outcomes require tracking pathways to housing and case management as well as time and resources to reflect on what is going well and what could be improved. Both require good data entry and technical assistance with identifying and evaluating exit data to address disparities. Training should focus on how the data can support shelter staff's efforts, rather than merely being 'paperwork.'
- Shelter rules should prioritize staff and guest safety, with clear communication to guests. There should be an established appeals process and a commitment to corrective action.

Equity Policy Themes:

Most participants expressed interest in more training and technical assistance related to equity, as well as identifying resources that could help improve shelter access and outcomes for historically underserved populations.

- Equity in outcomes could be improved through flexible housing assistance to better support people who are black, indigenous or people of color.
- Shelters need to invest in training staff who are bicultural, bilingual, and represent the populations being served and/or staff with lived experience (peer model).
- There is an opportunity for OHCS to establish standards and guidance on equity through clear and consistent communication, define commonly misunderstood terms and make baseline recommendations around promoting equitable outcomes and access to resources.
- Participants additionally emphasized needing more training and technical assistance related to supporting undocumented and immigrant households, specifically around Oregon's sanctuary laws and federal immigration enforcement.

Funding Formula Themes:

OHCS sought input on the funding formula to use for the allocation of funds to regions. Under HB 3644, OHCS must develop a funding formula that considers both the needs of the region and the past performance of the region, which is a new metric that has not previously been included in funding formulas.

- Respondents shared that every data source has its flaws, so a combination of data should be used to get an accurate snapshot of the need. Some suggested data sources and metrics other than the Point In Time (PIT) count and Homeless Management Information System (HMIS) data include:
 - 1) A region's housing inventory, including affordable housing units
 - 2) McKinney-Vento data
 - 3) Community needs assessment
 - 4) Head start numbers
 - 5) Increasing sheltered homelessness and/or decreasing unsheltered homelessness
 - 6) Shelter bed utilization rates
 - 7) Average and fair market rent costs in the community
 - 8) The gap between affordable housing units and non-affordable housing units available
 - 9) The county's cost of living
 - 10) Eviction rates
 - 11) Doubled up count
 - 12) HUD's Housing Inventory Count (HIC)
 - 13) Local data sources, such as Multnomah's 'by name' count
- Total number counts put smaller regions at a disadvantage when compared to larger regions and may not be reflective of overall need, so consider using per capita counts.
- External factors impact shelters' ability to move guests to permanent housing, so should not be used as the only metric for success. Regardless of how successful a shelter is at meeting established metrics, we need to ensure we are funding shelters' basic shelter operation costs, so we do not lose any existing beds.

Request for Applications

The purpose of a request for applications (RFA) is to solicit applications for regional coordinators. OHCS had one listening session devoted entirely to developing an RFA. In that session, participants were asked about the most important qualities of a regional coordinator and also about creating a regional plan as required by HB 3644.

Regional Coordinator Qualities

“Regional coordinator” means a local government or nonprofit public benefit corporation that develops a regional assessment and plan, an annual report, and receives and distributes state funding for shelter and rehousing programs for the region. OHCS gathered feedback on the most important qualities of a regional coordinator.

- A regional coordinator should have existing connections in their entire region and experience working collaboratively across differences between OHCS and others in the area.
- A regional coordinator must have experience with OHCS systems and processes, a record of success in administering OHCS funds, and the staff capacity in place to be able to make payments quickly from the start.
- Transparency, consistency, clearly documented requirements, and strong communication skills are necessary for working with subrecipients who may be unfamiliar with state processes.

Regional Planning

Regional coordinators will be responsible for developing a regional plan that details the region’s services and outcomes that will be supported by program funds. At a minimum, regional plans must integrate support for tribal sovereignty and support culturally responsive shelter providers, rural shelter providers, and planning partners to meet the unique needs of the communities. The regional plan may include diverse housing-focused shelter options.

- Developing a regional plan requires extensive community engagement, and doing it right takes a lot of time and resources, especially when getting feedback from tribal partners and folks with lived experience.
- A successful regional plan requires OHCS to clearly and consistently communicate standards to all regional coordinators before they develop the regional plan.
- To ensure an inclusive and equitable regional plan, regional coordinators must actively involve those who have historically been left out and give those voices a meaningful say in the plan’s development. Tribal communities, culturally responsive organizations, and people experiencing homelessness have traditionally been left out of the process or tokenized when they should be central to the process (“Nothing about us without us”).

Next Steps

OHCS is using the feedback gathered from the listening sessions and survey to draft the Oregon Administrative Rules, program manual, and the request for applications. The next engagement opportunity will be the Rules Advisory Committee on Sept. 2, 2025, where committee members

can review and comment on the proposed administrative rules. OHCS anticipates the release of the RFA, including the regional plan template, in the fall of 2025.

Appendix: Statewide Shelter Program Engagement Questions and Responses

Introduction

This appendix provides an overview of questions and responses to both the virtual listening sessions and the survey. The narrative responses are summarized to include all engagement sessions, including responses from the OHCS-hosted listening sessions, Mental Health Addiction and Association of Oregon hosted listening session at the PeerPocalypse, and the survey. The tables only illustrate the responses to closed-ended questions in the survey. Survey respondents had the option to complete the entire survey or complete specific sections that are applicable to their agency.

Shelter operations

Question: Are there other shelter operations costs not included here that, if not funded, would limit or restrict shelter service or operating hours?

- Lease or rent payments for shelter facility
- Utilities
- Security equipment or service to operate shelter facility
- Janitorial supplies and services to operate shelter facility
- Facility management (staff costs for a facilities manager to manage day-to-day operations necessary to ensure a physical environment that also supports a shelter's needs and core function)
- Minor maintenance/repairs to facility
- Furnishings for shelter facility necessary for operation and maintaining bed capacity
- Food for congregate shelter facility settings
- Costs to board and care for shelter residents' animals, such as boarding costs, kennels, leashes, food, toys, veterinary services not available or inaccessible within the community

Responses: The majority of responses indicate costs are missing. **The most frequently reported missing cost was staffing.** Respondents emphasized the high cost of full-time, non-managerial staffing, particularly when providing the robust, specialty care necessary for shelter operation and efficacy. Other common responses include:

- Medical/behavioral health staff and supplies,
- Training,
- Technology and data management,
- Flexible funds for participant needs,
- Transportation,
- Equipment,

- Move-in costs/flexible funds for housing placement, Laundry, Storage (particularly off-site storage), Insurance, Bed bug treatment, Supplies for hygiene harm reduction,
- Facility upgrades, maintenance or repairs.

OHCS staff noted that some of the costs that respondents described as missing are currently allowable or are being implemented in the next iteration of the shelter program.

Shelter services

Question: What other service requirements should be included as required or optional for emergency shelters?

Responses: Many responses indicated the need for staff training as a requirement with emphasis on trauma-informed care, mental and behavioral health, and familiarity interacting with highly vulnerable populations. Additionally, adequate case management services and data collection competency were mentioned as possible requirements. Designated areas for certain populations, children, and domestic violence survivors, were also mentioned.

Question: What are minimum services emergency shelters should provide to ensure they are safe, easy to access, and help participants with their housing goals?

Responses: Many responses indicated food provided or meal prep areas, as well as showers, toilets and laundry should be minimum services. Additionally, many noted there should be case management, housing navigation, and coordination of mental health and physical health services. Others noted that there should be laundry facilities, showers, restrooms, and measures to mitigate infestation (like a heat tent). Others suggested that there should be basic needs available, such as clothing and hygiene products. Many shared there needs to be minimum training that is culturally responsive, uses harm reduction, trauma-informed care, and other safety-focused topics. There were other comments that shelters should be available 24/7, have on-site security, be near public transportation or provide transportation options, ensure units are climate-controlled, provide parking to shelter guests, keep families together, accommodate pets, and use Coordinated Entry or HMIS.

| Shelter Services Survey Responses (N=42) | Required | Optional | Other |
|--|----------|----------|-------|
| Shelter provides space to live and securely stores belongings (including ability to securely store prescription medications) | 66.7% | 19.0% | 14.3% |
| Shelter includes kitchen/meal preparation facilities | 38.1% | 45.2% | 16.7% |
| Shelter provides meals | 48.8% | 41.5% | 9.8% |
| Shelter includes bathroom (toilet/shower) facilities | 92.9% | 0.0% | 7.1% |
| Shelter is free of accumulated trash and debris, and all trash is kept securely in closed/covered bins | 88.1% | 2.4% | 9.5% |
| Shelter does regular cleaning, and areas of high traffic must be regularly disinfected to reduce the spread of germs. | 95.2% | 0.0% | 4.8% |
| Shelter appropriately disposes of hazardous materials, such as needles/sharps | 95.2% | 0.0% | 4.8% |
| Shelter creates access to refrigeration for required prescription medication that is needed for a resident or their pet | 81.0% | 11.9% | 7.1% |
| Shelter accommodates pets | 47.6% | 38.1% | 14.3% |
| Shelter has case management staff available | 71.4% | 16.7% | 11.9% |
| Shelter has training and written policies for engaging shelter participants to gather required data elements related to homelessness | 83.3% | 7.1% | 9.5% |
| Shelter has access to financial assistance to help with rental applications, deposits, and move-in costs | 57.1% | 31.0% | 11.9% |
| Shelter has security on-site | 33.3% | 35.7% | 31.0% |

Question: What would be barriers to meeting these standards and why?

Responses: Many responses shared that service requirements should vary based on the type of shelter being offered (inclement weather, day center, year-round, etc.). The most common barrier noted is funding to meet standards, as well as recruiting and maintaining staff. Other common barriers include:

- On-site kitchen/meal preparation facilities can be cost-prohibitive, or there isn't space.
- Accommodating pets because of concern of conflict with other pets or guests, allergies, and the added space they require.

- On-site security due to the cost and in some cases the belief the focus should be more on de-escalation training than security.
- Providing financial assistance to help guests with rental applications, deposits, and move-in costs. Respondents agreed this would be helpful but that funding for move-in costs is not typically available or enough.
- Providing storage for belongings because there is not enough space at the shelter.
- Having on-site plumbing, without which they are limited in being able to offer showers and plumbed toilets, although porta-potties are an option.

| Barriers to Shelter Standards Survey Responses (N=31) | 1- Not at all challenging | 2- Slightly challenging | 3- Somewhat challenging | 4- Moderately challenging | 5- Extremely challenging | Average Rating |
|--|----------------------------------|--------------------------------|--------------------------------|----------------------------------|---------------------------------|-----------------------|
| Shelter provides protection from the elements | 51.6% | 19.4% | 12.9% | 9.7% | 6.5% | 2.00 |
| Shelter provides space to live and securely stores belongings (including ability to securely store prescription medications) | 22.6% | 25.8% | 19.4% | 22.6% | 9.7% | 2.71 |
| Shelter includes kitchen/meal preparation facilities | 12.9% | 29.0% | 16.1% | 22.6% | 19.4% | 3.06 |
| Shelter includes bathroom (toilet/shower) facilities | 51.6% | 29.0% | 3.2% | 6.5% | 9.7% | 1.94 |
| Shelter is free of accumulated trash and debris, and all trash is kept securely in closed/covered bins | 54.8% | 25.8% | 6.5% | 12.9% | 0.0% | 1.77 |
| Shelter does regular cleaning, and areas of high traffic must be regularly disinfected to reduce the spread of germs. | 58.1% | 22.6% | 12.9% | 3.2% | 3.2% | 1.71 |
| Shelter appropriately disposes of hazardous materials, such as needles/sharps | 63.3% | 6.7% | 20.0% | 10.0% | 0.0% | 1.77 |
| Shelter creates access to refrigeration for required prescription medication that is needed for a resident or their pet | 35.5% | 22.6% | 25.8% | 12.9% | 3.2% | 2.26 |
| Shelter accommodates pets | 16.1% | 19.4% | 22.6% | 22.6% | 19.4% | 3.10 |
| Shelter has case management staff available | 35.5% | 16.1% | 19.4% | 16.1% | 12.9% | 2.55 |
| Shelter has training and written policies for engaging shelter participants to gather required | 38.7% | 22.6% | 16.1% | 16.1% | 6.5% | 2.29 |

| | | | | | | |
|--|-------|-------|-------|-------|-------|------|
| data elements related to homelessness | | | | | | |
| Shelter has access to financial assistance to help with rental applications, deposits, and move-in costs | 6.5% | 25.8% | 12.9% | 25.8% | 29.0% | 3.45 |
| Shelter has security on-site | 23.3% | 10.0% | 23.3% | 23.3% | 20.0% | 3.07 |

Basic Freestanding and Vehicular Camping

Question: What should be minimum services and amenities for vehicular camping or basic freestanding structures programs?

Response: There was an underlying theme and ask that OHCS consider regional flexibility as community needs, resources, and community support may vary region to region. Many respondents identified minimum services that mirrored services and amenities required of traditional emergency shelters, such as access to potable water, access to showers and restrooms, waste management, site cleanliness, case management, and housing navigation/housing-focused services.

Those who participated in the PeerPocalypse listening session emphasized robust supportive services, including trauma-informed staff, peers, and support to avoid staff burnout. Other minimums were also identified, including vehicle repair, removal/towing, support with vehicle registrations, and other resources directly tied to RV related expenses. For all programs, but especially with RVs, respondents stressed the need to prevent and suppress fires. Respondents shared the need for inclement weather response, especially for hot and smoky events. Other respondents, although less common, shared that there is a need for proper lighting for security, 24/7 staff, tech access (for job search, applications, etc.), pet waste areas, meal storage and prep areas, and climate-controlled areas for freestanding structures without heating/cooling units. There are mixed responses regarding the need for security. Some shared that there should be a disposal plan for abandoned vehicles, but not a requirement that vehicular camping provides removal/towing. There are a couple of comments related to alternatives to these types of programs, like motel vouchers and emergency shelters, noting that some individuals sleep in their vehicles because they are concerned about the safety in emergency shelters.

| Vehicular Camping and Basic Freestanding Structure: Amenities Survey Responses (N=19) | Required | Optional | Other |
|--|-----------------|-----------------|--------------|
| Sanitary facilities on-site, such as portable toilets or access to toilet facilities | 94.7% | 0.0% | 5.3% |
| Potable water | 73.7% | 21.1% | 5.3% |
| Direct access from electricity to unit | 21.1% | 68.4% | 10.5% |
| Access to electricity anywhere on-site, not necessarily directly to the unit | 63.2% | 31.6% | 5.3% |
| Access to showers | 52.6% | 42.1% | 5.3% |
| Locking door | 52.6% | 36.8% | 10.5% |
| Site cleanliness/janitorial services for regular clean-up of the site | 84.2% | 10.5% | 5.3% |
| Garbage collection, inclusion of “sharps” and other bio-hazard disposal | 89.5% | 5.3% | 5.3% |
| Waste management that includes plans to address spills and RV waste disposal | 84.2% | 15.8% | 0.0% |

| Vehicular Camping & Basic Freestanding Structure: Services Survey Responses (N=18) | Required | Optional | Other |
|---|-----------------|-----------------|--------------|
| Refrigeration and space available for participants to prepare their own food | 16.7% | 77.8% | 5.6% |
| Meals provided by the program | 22.2% | 77.8% | 0.0% |
| Provision of services to participants, such as case management, rehousing options, housing navigation, links to employment, and needed medical services, etc. | 83.3% | 16.7% | 0.0% |
| Financial assistance to help with rental applications, deposits, move-in costs | 38.9% | 61.1% | 0.0% |
| Security on-site | 33.3% | 50.0% | 16.7% |
| Timely and appropriate responses to compliance with zoning requirements, when identified by state, local, or county officials | 66.7% | 22.2% | 11.1% |
| For vehicular camping only: Removal/towing of inoperable and/or abandoned vehicles | 64.7% | 17.6% | 17.6% |

| | | | |
|--|--|--|--|
| | | | |
|--|--|--|--|

Question: Recognizing these programs are not considered shelter because they do not meet HUD shelter habitability standards, for programs where it may be possible to align with habitability standards, which of these standards are most challenging to meet and why?

Responses: The most common barriers to meeting shelter habitability standards are related to health and sanitation, including air quality, electricity to each unit, and sanitation services. Other challenging habitability standards to meet are water and meal preparation sites. These barriers are heightened in severe weather conditions (examples of extreme heat, cold, and smoke) as respondents noted the need for mitigation strategies.

Respondents shared barriers/ challenges in general for vehicular camping and basic-freestanding structures. Many emphasized the need for flexibility with these programs. A common barrier reported was the infrastructure needed to provide access to electricity, including lighting and refrigeration for participants' medication. Another common barrier was how to handle vehicles that require repair or are inoperable, which, in some cases, an abandoned vehicle can create health hazards like asbestos. Other barriers include lack of community support, local zoning/permitting, hazmat waste if sites are not properly set up, the location's access to transportation or proximity to resources, and the availability of storage, water and shower facilities.

| Vehicular Camping and Basic Freestanding Structures: Habitability Standard Survey Responses (N=13) | 1- Not at all challenging | 2- Slightly challenging | 3- Somewhat challenging | 4- Moderately challenging | 5- Extremely challenging | Average Rating |
|---|----------------------------------|--------------------------------|--------------------------------|----------------------------------|---------------------------------|-----------------------|
| Structure and materials | 30.8% | 7.7% | 23.1% | 15.4% | 23.1% | 2.92 |
| Access | 7.7% | 15.4% | 15.4% | 7.7% | 53.8% | 3.85 |
| Space and security | 23.1% | 15.4% | 23.1% | 15.4% | 23.1% | 3.00 |
| Interior air quality | 7.7% | 23.1% | 38.5% | 7.7% | 23.1% | 3.15 |
| Water supply | 23.1% | 30.8% | 38.5% | 7.7% | 0.0% | 2.31 |
| Sanitary facilities | 38.5% | 15.4% | 23.1% | 15.4% | 7.7% | 2.38 |
| Thermal environment | 7.7% | 23.1% | 0.0% | 7.7% | 61.5% | 3.92 |
| Illumination and electricity | 16.7% | 8.3% | 8.3% | 25.0% | 41.7% | 3.67 |
| Food preparation | 7.7% | 23.1% | 7.7% | 7.7% | 53.8% | 3.77 |
| Sanitary conditions | 23.1% | 30.8% | 23.1% | 15.4% | 7.7% | 2.54 |
| Fire safety | 23.1% | 15.4% | 30.8% | 7.7% | 23.1% | 2.92 |

Low Barrier

Question: What policies or practices would contribute to creating more welcoming and easier to access shelter spaces? / What other practices or policies should be included?

Responses: Many requested clarification on the definition and practical application of “low-barrier,” with particular emphasis on how to operate a low-barrier shelter with considerations of where to place high-risk populations (families, survivors of domestic violence, those with criminal justice involvement, and those with mental and physical disabilities). Many responses touched upon the need for a clear strategy on where and how to place participants who have a history of sexual violence. Respondents shared that they may exclude those with sex offences because of insurance requirements and because of the safety of other shelter guests.

Others expressed the need for shelters to better accommodate families, including larger families, so they can stay together and feel safe. Another common response was around the need for a mix of shelter types and services, such as congregate vs non-congregate, low-barrier vs recovery-based, and different spaces within a shelter for those in active recovery. Respondents noted that more resources are needed to manage low-barrier services, including additional staffing and training. Respondents emphasized the importance of communicating shelter rules to participants, with a focus on behavior and respect, to ensure accountability among clients and staff. Some shared it would be helpful to have a connection to Coordinated Entry, while others expressed concerns about waitlists and the potential conflict between Coordinated Entry and low-barrier policies.

There were other responses around:

- Having an appeals process for shelter denials
- How to enforce low-barrier
- Using harm reduction approach
- More training for staff
- Addressing staff wages
- Accommodating pets
- Gender and inclusivity
- Incorporating trauma-informed care in design
- No requirements around citizenship
- Consideration of mandatory reporting
- Language access
- Proximity to transportation or other resources
- Acknowledging the health care needs and challenges, particularly those being discharged from health care settings

| Low Barrier Policy Survey Responses (N=47) | 1- Not at all important | 2- Slightly important | 3- Neutral | 4- Moderately important | 5- Extremely important | Average Rating |
|--|--------------------------------|------------------------------|-------------------|--------------------------------|-------------------------------|-----------------------|
| Sobriety and treatment are voluntary | 2.1% | 2.1% | 19.1% | 19.1% | 57.4% | 4.28 |
| No required documentation of identification, custody, or gender | 8.7% | 10.9% | 13.0% | 10.9% | 56.5% | 3.96 |
| Services are available to all individuals regardless of sexual orientation, gender identity, or marital status | 2.1% | 0.0% | 2.1% | 6.4% | 89.4% | 4.81 |
| No charge to individuals or families for stays, meals, or services rendered | 2.1% | 2.1% | 2.1% | 10.6% | 83.0% | 4.70 |
| Does not exclude people with criminal convictions | 0.0% | 10.6% | 14.9% | 25.5% | 48.9% | 4.13 |
| Does not exclude people with poor credit or eviction history | 8.5% | 0.0% | 2.1% | 4.3% | 85.1% | 4.57 |
| Limits access to individuals who have a history or record of prior sex offenses | 12.8% | 19.1% | 21.3% | 23.4% | 23.4% | 3.26 |
| Shelter accommodates pets and belongings | 0.0% | 4.3% | 10.6% | 21.3% | 63.8% | 4.45 |
| Shelter's intake process and housing navigation services coordinate closely with community-based outreach services and coordinated entry | 4.3% | 2.1% | 8.5% | 14.9% | 70.2% | 4.45 |
| Shelter creates flexible and predictable access for people seeking shelter | 0.0% | 2.1% | 4.3% | 10.6% | 83.0% | 4.74 |
| Shelter focuses on addressing disruptive or dangerous behaviors rather than compliance with rules or a case plan | 0.0% | 2.1% | 21.3% | 19.1% | 57.4% | 4.32 |
| Shelter welcomes self-defined family and kinship groups to seek shelter together | 0.0% | 4.3% | 14.9% | 21.3% | 59.6% | 4.36 |
| Shelter staff are trained in cultural competency, implicit bias, and other racial equity topics to promote and further racial equity within their programs | 2.1% | 2.1% | 2.1% | 19.1% | 74.5% | 4.62 |

Shelter Exits/ Equity

Question: What policies or practices would contribute to more equitable outcomes in shelter exits?

Responses: Several respondents shared that successful outcomes depend on tracking participants' pathways to housing and case management, which requires accurate data entry and data tracking. Many shared training and technical assistance would contribute to more successful outcomes. Additionally, respondents emphasized funding for housing placement, including flexible housing assistance resources that better support underrepresented populations. Many said there needs to be investment in staffing that is bicultural, bilingual, represents the populations being served, and includes those with lived experience (peer model). Others shared that they need additional administrative funding for planning, creating opportunities for behavior change (such as corrective action/behavior and pathways back to shelter if exited), enforcement of Oregon sanctuary law, case management, review of all shelter exits, consideration of mandatory reporting, and building relationships with community-based organizations.

Question: What is your shelter or community currently doing to reduce disparities in shelter exits?

Responses: Most respondents shared that they are working toward cultural responsiveness and trauma-informed care when setting program rules and procedures. Others shared that they are working toward having clear, documented information on reasons for termination and appeals processes, as well as policies that involuntary exits occur only as a last resort. Fewer respondents said they use a racial equity lens to ensure termination policies do not disproportionately impact Black, Indigenous, and people of color and other people from historically underserved populations. However, respondents shared an interest in additional training and technical assistance, particularly in utilizing an equity lens and conducting regular evaluations of shelter exit data to assess disparities.

| Shelter Exits Survey Responses (N=31) | Currently in use | In the process of implementing | Not yet implemented | Unsure |
|--|------------------|--------------------------------|---------------------|--------|
| Use of a racial equity lens to ensure termination policies do not disproportionately impact BIPOC and other people from historically underserved communities | 29.0% | 16.1% | 16.1% | 38.7% |
| Cultural responsiveness and trauma-informed care when setting program rules and procedures | 71.0% | 3.2% | 0.0% | 25.8% |

| | | | | |
|--|-------|-------|------|-------|
| Regular evaluation of shelter exit data to assess for any disparities | 35.5% | 19.4% | 6.5% | 38.7% |
| A process for ensuring documentation of steps or actions that were taken to avoid any denials, limitation or reduction of benefits, such as restorative justice engagement, mediation, or similar step | 38.7% | 16.1% | 9.7% | 35.5% |
| Clear, documented information on reasons for termination and an appeals process | 59.4% | 0.0% | 3.1% | 37.5% |
| Policies that ensure that involuntary exits occur only as a last resort in the most serious cases to protect the health, safety, and respect of shelter participants and staff | 48.4% | 9.7% | 6.5% | 35.5% |

| Training and Technical Assistance Survey Responses (N=21) | Yes, would like more training and technical assistance |
|--|---|
| Use of a racial equity lens to ensure termination policies do not disproportionately impact BIPOC and other people from historically underserved communities | 71% |
| Cultural responsiveness and trauma-informed care when setting program rules and procedures | 57% |
| Regular evaluation of shelter exit data to assess for any disparities | 71% |
| A process for ensuring documentation of steps or actions that were taken to avoid any denials, limitation or reduction of benefits, such as restorative justice engagement, mediation, or similar step | 57% |
| Clear, documented information on reasons for termination and an appeals process | 52% |
| Policies that ensure that involuntary exits occur only as a last resort in the most serious cases to protect the health, safety, and respect of shelter participants and staff | 57% |

Funding Formula

Determining Need

Question: Which factors do you support in using in the funding formula for determining the needs of the region?

Responses: Respondents shared they would need support, such as funding and technical assistance, to improve Homeless Management Information System (HMIS) data reporting. Some respondents supported factors such as percentage tied to sheltered homelessness, unsheltered homelessness, and shelter utilization. Some shared that a combination of both Point in Time Count (PIT) and American Community Services data was discussed; however, using the PIT as a standalone report remains a concern. Regarding data collection, respondents expressed a desire for standardization and consistency in data reporting requirements.

Additionally, several participants shared their support using rental costs and available units, as well as the per capita homeless count rather than the total homeless count. Respondents also shared that some data may not align with HUD criteria, such as McKinney-Vento. Others mentioned the desire to include poverty-focused data in comparison to homeless services utilization.

| Formula Factor Survey Responses (N=39) | Strongly Oppose | Somewhat Oppose | Neutral | Somewhat Support | Strongly Support | Average Rating |
|--|-----------------|-----------------|---------|------------------|------------------|----------------|
| Total people experiencing homelessness, including both sheltered and unsheltered (PIT) | 17.9% | 15.4% | 12.8% | 20.5% | 33.3% | 3.36 |
| The rate of unsheltered homelessness (PIT) | 15.4% | 12.8% | 12.8% | 25.6% | 33.3% | 3.49 |
| Homelessness per capita or homelessness rate (PIT) | 12.8% | 17.9% | 2.6% | 25.6% | 41.0% | 3.64 |
| Households with income less than \$35,000 experiencing severe rent burden (ACS) | 10.3% | 0.0% | 12.8% | 35.9% | 41.0% | 3.97 |
| Number of people experiencing poverty (ACS) | 5.1% | 5.1% | 10.3% | 41.0% | 38.5% | 4.03 |
| Poverty Rate (ACS) | 5.1% | 7.7% | 15.4% | 30.8% | 41.0% | 3.95 |
| Number of homeless students (Department of Education McKinney-Vento) | 5.1% | 7.7% | 2.6% | 25.6% | 59.0% | 4.26 |

Question: (For survey respondents only): You indicated you oppose using “total people experiencing homelessness, including both sheltered and unsheltered Point in Time Count” in the funding formula. Please describe the reason for your response.

Responses: Many shared that the Point in Time Count is an undercount in their regions, and it does not often reflect how many people are experiencing homelessness. Some suggested that a per capita measure of homelessness would be more representative.

Question: (For survey respondents only): You indicated you oppose using “Poverty Rate (ACS)” in the funding formula. Please describe the reason for your response.

Responses: Some shared they opposed poverty data because it is not targeted enough to people experiencing homelessness, and it seems less directly related to the need, as not everyone in poverty or experiencing rent burden is homeless.

Question: (For survey respondents only): You indicated you oppose using “McKinney-Vento” in the funding formula. Please describe the reason for your response.

Responses: Some believe McKinney-Vento is not a direct reflection of the number of adults who are experiencing homelessness. However, they noted it would make sense to use this method to determine funding of family and youth-specific shelters.

Question: Are there other data sources you wish we were using?

Responses: Several shared that it would be helpful to include a by-name list and HMIS data. Others shared it would be beneficial to include available rental units, rental and affordable housing vacancy rates, fair market rents, average rent costs, gap of affordable and non-affordable housing units available, cost of living in a county, eviction rates, doubled-up count, rural factor, community needs assessment, shelter utilization, shelter operations costs, shelter beds supported by state funding, and the Housing Inventory Count.

Performance Metrics

Question: Which factors do you support in using in the funding formula for performance metrics for the region?

Responses: Many shared concerns regarding utilizing the same metrics if organizations do not have the same data systems or capacity. There were also concerns about how unsheltered homelessness data is measured, as it could be influenced by factors outside of the shelter’s control, such as long-term stays and exits, and how this data is tracked. Participants expressed a desire to include metrics that demonstrate their participants’ experience and performance tied to racial equity. Others performance metrics mentioned include fiscal monitoring compliance/ financial performance, shelter utilization rates, and exits to a broad spectrum of housing.

| Performance Metric (N=38) | Strongly Oppose | Somewhat Oppose | Neutral | Somewhat Support | Strongly Support | Average rating |
|---|-----------------|-----------------|---------|------------------|------------------|----------------|
| Reducing unsheltered homelessness | 5% | 13% | 24% | 32% | 26% | 3.61 |
| Transitioning people from homelessness to housing stability | 0% | 8% | 16% | 34% | 42% | 4.11 |
| Housing retention for people rehoused through the program | 8% | 8% | 18% | 26% | 39% | 3.82 |

Question: (For survey respondents only): Please explain why you oppose using “percentage of households served who return to unsheltered homelessness” as the performance metric for reducing unsheltered homelessness in the funding formula.

Responses: Some respondents opposed this because there are too many external factors outside the shelter’s control that come into play, such as a limited number of units, limited case management and support services, and a lack of Permanent Supportive Housing units.

Question: (For survey respondents only): Please explain why you oppose using “percentage of households served who have permanent housing placements” as the performance metric for reducing unsheltered homelessness in the funding formula.

Responses: Some respondents opposed this because they felt it seemed more appropriate for transitional housing than emergency shelter.

Question: (For survey respondents only): Please explain why you oppose using “percentage of households served who re-engage with another homeless provider within one year” as the performance metric for reducing unsheltered homelessness in the funding formula.

Responses: Some respondents opposed this because they felt it seemed more appropriate for housing programs than shelter. They were also opposed because homeless provider may offer basic needs navigation, food support, and other connections to services, so engaging with a provider again can be considered positive.

Request for Application

Regional Coordinator

What other/most important qualities of a regional coordinator would you like to see listed in the Request For Applications?

Responses: Respondents said the most important qualities of a regional coordinator are past experience in receiving and administering state and federal funding, ability to administer funds to other entities, neutral and equitable approaches, established relationships with culturally responsive organizations and a continuum of care. They also emphasized the importance of collaboration, alignment across communities and values, and adaptability and flexibility. Some emphasized the ability to demonstrate experience, capability, and effectiveness in collaboration, partnership, program administration, efficiency in reimbursement of payment processing, and regional knowledge.

| Qualities of a Regional Coordinator Survey Responses (N=33) | Not at all important | Slightly important | Neutral | Moderately important | Extremely important |
|---|-------------------------|-----------------------|---------|-------------------------|------------------------|
| Experience distributing funding to subgrantees | 0.0% | 0.0% | 3.0% | 21.2% | 75.8% |
| Experience involving relevant stakeholders, including local government, nonprofit providers, and service agencies, and individuals with lived experience of homelessness, to develop a comprehensive plan for addressing homelessness | 0.0% | 3.0% | 3.0% | 21.2% | 72.7% |
| Strong relationship building, coordination, and communication with community stakeholders, including but not limited to local government, nonprofit providers, service agencies, and individuals with lived experience. | 0.0% | 0.0% | 3.0% | 21.2% | 75.8% |
| Experience providing technical assistance to subgrantees, including training, guidance on best practices, and capacity building to ensure shelter and housing programs are designed and delivered effectively | 3.0% | 0.0% | 6.1% | 33.3% | 57.6% |
| Experience utilizing Homeless Management Information System (HMIS) to collect data on the number of people experiencing homelessness, the types of services they use, and the effectiveness of homeless service programs | 0.0% | 9.1% | 12.1% | 21.2% | 57.6% |
| Experience using data to monitor program performance, identify areas for improvement, and inform future planning | 3.0% | 6.1% | 9.1% | 27.3% | 54.5% |
| Experience leveraging various funding sources to support homeless services and programs, and uses resources effectively to ensure they are used efficiently to meet the needs of the community | 0.0% | 0.0% | 6.1% | 30.3% | 63.6% |

Insurance

Question: Have you experienced any challenges related to obtaining insurance typically required for OHCS grants? If yes, please describe those challenges.

Responses: Respondents shared that the cost of insurance, insurance requirements, and the limited number of insurers willing to insure shelters are challenges. Respondents mentioned the same barriers, asking if the regional coordinator could cover the insurance requirements instead of the smaller organization. Some note that they would need to adjust their shelter model to receive necessary insurance coverage. The prolonged time to obtain coverage is a barrier for some. Some mentioned the need for clarity on how insurance requirements will be broken up between grantees and their subrecipients; grantees may need further guidance on determining what limits subrecipients need to hold. An additional issue is that once insurance is obtained, retaining that coverage is challenging.

Registering for OregonBuys

To apply for grants, applicants must be a registered vendor in OregonBuys. Is your organization a registered vendor in OregonBuys? Have you experienced any challenges registering?

Responses: Respondents find OregonBuys is not user-friendly. Most noted that they are registered with OregonBuys and have received technical assistance; however, the system remains hard to navigate. Some noted that resources, such as user manuals, don't align with the interface, and that it freezes in the middle of complex processes.

Registering with the State to do business in Oregon

Question: To apply for grants, applicants must be registered with the state to do business in Oregon. Is your organization registered to do business in Oregon? Have you experienced any challenges registering?

Responses: Respondents did not share any feedback on this question.

Applying for Grants

Question: Do you have any other feedback about applying for grants?

Responses: Respondents noted the importance of transparency, consistency, and clearly documented requirements, particularly for those who are unfamiliar with state requirements. Some shared that there are stricter requirements for funding and that it is necessary to consider how this impacts grantees and subgrantees.

Regional planning

Question: If your organization has participated in developing a regional plan or similar comprehensive plan for addressing homelessness, what were the challenges or barriers experienced in achieving set goals?

Responses: Respondents noted challenges with overall collaboration, including competing priorities, strong feelings, and organizational competition instead of collaboration for OHCS resources. They reported difficulty finding shared accountability and alignment, as well as coming to consensus. Some of the challenges were organizations having different capacities, philosophies, and scopes of services. It was noted that mental and behavioral health providers are important partners who are not always involved or do not participate when invited. Other challenges were personal interests, local politics, “not in my backyard” mentality in the community that hindered support for services. A lack of time, insufficient staffing, limited diversity among staff (specifically not enough Spanish-speaking staff) were other barriers. Limited resources, lack of sustainable funding, and funding requirements were other challenges. Lack of available housing, lack of affordable housing, challenging landlords, and credit/eviction barriers for program participants were other challenges. Respondents noted that a challenge is that different data systems are not compatible with one another. Some shared that there are barriers to including people with lived experience and highly vulnerable populations.

Question: What type of training and TA would have supported efforts in achieving those goals?

Responses: The most common response was the desire for clearer and consistent communication about funding and expectations so that grantees can plan ahead. Others suggested more technical assistance at the local level, including on data collection, programmatic content (housing barrier removal/ landlord engagement), cross-learning around the state, and more intentional tribal engagement.

Question: What went well and/or what were successes you experience [with regional planning]?

Responses: Many shared that they were able to focus on outcomes and meet their goals that resulted in new programs or growth within the homeless service system. Some commented that they had strong partnerships, diverse perspectives from service providers and people experiencing homelessness, and other key partners. Some noted that by working in partnership, they were able to leverage other community resources.

Question: What feedback do you have on strategies regions would use to develop a regional plan, including strategies to collaborate with key stakeholders and to ensure regional planning is equity-focused and inclusive of marginalized voices?

Responses: Respondents shared their need for more adequate time to effectively engage with the community. They also expressed the need for more involvement from tribal governments. Some suggested that OHCS should be more involved, while others argued for less involvement and greater trust in local regions. Concerns were raised about the loudest voices being heard in the regional planning process, which could potentially leave some areas out. Some shared that those with lived experience and culturally responsive organizations should be at the table, but they should be compensated to do so and shouldn't be forced.

Question: The initial regional plan will start in the middle of the biennium. Subsequent regional plans will then need to be updated every two years. To get the regional plan timing in sync with a full biennium, there are two options: 1) To start with a 1-year regional plan 2) To start with a 3-year regional plan. What do you see as the pros and cons to each approach?

Response: There was a strong preference for an initial 3-year plan over a 1-year plan.

Enrolled

House Bill 3644

Sponsored by Representative MARSH; Representatives ANDERSEN, DOBSON, GAMBA, LEVY E,
Senator NERON (at the request of Governor Tina Kotek)

CHAPTER

AN ACT

Relating to a statewide shelter program; and declaring an emergency.

Whereas Governor Tina Kotek's emergency response to unsheltered homelessness, in partnership with the Legislative Assembly, has funded increased shelter, rehousing and homelessness prevention services; and

Whereas Oregon is projected to support over 4,800 shelter beds, rehouse 3,300 households and prevent another 24,000 households from experiencing homelessness by June 30, 2025; and

Whereas the state has significantly expanded its role in Oregon's shelter system over the past five years; and

Whereas this expansion has maintained critical funding for local governments and services providers; and

Whereas many of these efforts have been one-time or emergency in nature; and

Whereas in July of 2024, Governor Kotek and Representative Pam Marsh convened a sustainable shelter work group tasked with developing recommendations for a permanent state shelter program; and

Whereas the work group published a set of recommendations for program implementation; and

Whereas it is necessary to create a statutory framework under which the Housing and Community Services Department may implement the work group recommendations through the development of program rules and administration of funds to regional providers; now, therefore,

Be It Enacted by the People of the State of Oregon:

SECTION 1. (1) As used in this section and section 2 of this 2025 Act:

(a) "Planning partners" includes shelter providers, local jurisdictions, housing authorities, community action agencies, continuums of care, day center service providers, rehousing services providers, county mental health providers and coordinated care organizations.

(b) "Program" means the statewide shelter program established under this section and section 2 of this 2025 Act.

(c) "Regional assessment" means an assessment of current conditions, resources and outcomes relating to homelessness for the region.

(d) "Regional coordinator" means a local government or nonprofit public benefit corporation that develops a regional assessment and plan and an annual report, and receives and distributes program funds for the region.

(e) "Regional plan" means a plan that details the services and outcomes for the region that will be supported with program funds.

(f) “Shelter” means a facility designed to provide temporary living arrangements on an emergency or transitional basis as may be further defined by the Housing and Community Services Department by rule.

(g) “Shelter provider” means any person or local government that operates or funds shelters.

(2) The Housing and Community Services Department shall establish a statewide shelter program for the purposes of reducing unsheltered homelessness and transitioning people from experiencing homelessness into housing stability.

(3) In implementing the program, the department shall:

(a) Focus on the outcomes of reducing unsheltered homelessness, transitioning people experiencing homelessness to housing stability and housing retention for people rehoused through the program;

(b) Foster equity in outcomes for those disproportionately impacted by structural inequities in homelessness and the homelessness response system;

(c) Require regional coordination in planning, funding and services;

(d) Provide flexibility to allow regional coordinators and shelter providers to meet the needs of each community;

(e) Facilitate consistent, predictable and trackable systems and services that allow the state, regional coordinators and shelter providers to plan for needs and reduce administrative burdens; and

(f) Ensure accountability for regional coordinators and shelter providers for minimum expectations and outcomes.

(4) Shelters receiving program funds must:

(a) Primarily be available throughout the day and night, seven days a week, and during all seasons and weather;

(b) Prioritize immediate access to shelter or transitional, temporary, permanent or other housing to provide stability and retention of housing;

(c) Conduct operations and services using evidence-based practices, cultural responsiveness, nondiscrimination and harm reduction; and

(d) Use coordinated entry and homeless management information systems to ensure integration with federal systems and data collection.

(5) The department shall adopt rules to administer the program, which must include rules establishing:

(a) Guidelines and funding agreements applicable to regional plans and funded shelters;

(b) Shelter types and services that may be eligible to receive funding from the regional coordinators;

(c) Minimum habitability and service requirements for each eligible shelter type;

(d) Policies regarding low-barrier and nonexclusionary shelter programs;

(e) Policies regarding exit and separation from shelter services;

(f) The requirements of agreements between regional coordinators and shelter providers; and

(g) A funding formula as described in section 2 (8) of this 2025 Act.

(6) Regional coordinators, regional plans and shelter providers may not establish requirements for services or use of funds different from, or in addition to, the requirements established by the department without review and approval by the department.

(7) Not later than November 15 of each year, the department shall submit, in the manner required under ORS 192.245, a report to the interim committees of the Legislative Assembly related to housing on the status and outcomes of the program.

SECTION 2. (1) The Housing and Community Services Department, after consultation with local planning partners, shall divide the state into regions, each no smaller than a single county, through which the statewide shelter program established under section 1 of this 2025 Act is implemented.

(2) The department, after consultation with local planning partners, shall establish and administer a process by which the department selects a regional coordinator for each region of the state.

(3) Upon selecting a regional coordinator, the department shall enter into an agreement with a five-year to six-year term and which the department may agree to renew on a non-competitive basis. During an agreement term, the department shall provide ongoing funding to operate the program to the regional coordinator. The department may only terminate the agreement during its term for good cause.

(4) Each regional coordinator is responsible for completing and submitting to the department:

(a) A regional assessment, once within the first year of the agreement term, which must include, within the region:

(A) Counts and the current conditions of individuals experiencing sheltered and unsheltered homelessness;

(B) The amount of federal, state and local funds spent on homelessness services by service type;

(C) Identification of current shelters and their services and capacity;

(D) Identification of planning partners for the regional plan;

(E) Community identified needs and priorities related to shelter and shelter services; and

(F) Other information or data collection as required by the department.

(b) A regional plan, updated every two years, that includes:

(A) Proposed actions to be taken by the regional coordinator and planning partners to further the values and purposes of the program;

(B) Proposed homelessness services and outcomes to be implemented by the regional coordinator, planning partners and shelter providers to address findings in the regional assessment;

(C) A proposed budget to fund the maintenance or expansion of eligible shelters and services through shelter providers within the region and to administer program moneys; and

(D) Other information or data collection as required by the department.

(c) An annual report, after the first year of the first agreement term, reporting on the progress made under the regional plan.

(5) Regional plans:

(a) Must prioritize:

(A) System capacity that provides shelter availability throughout the day and night, seven days a week, and during all seasons and weather.

(B) Ongoing stability for existing shelters receiving state funding.

(b) Must support culturally specific and rural shelter providers and planning partners to meet the unique needs of communities.

(c) Must integrate and support tribal sovereignty.

(d) May include, as appropriate, diverse housing-focused shelter options, including:

(A) Congregate and noncongregate shelters that meet habitability requirements established by the department; or

(B) Safe temporary emergency placement sites that meet health and safety requirements established by the department for the purposes of vehicular camping or siting basic freestanding structures that are structurally sound, are weatherproof and have a locking door.

(6)(a) A regional coordinator shall ensure that at least 70 percent of regional shelter funding is provided for shelters providing low-barrier practices with the balance available for recovery-based shelter.

(b) As used in this subsection:

(A) "Low-barrier" has the meaning given that term by rule by the department.

(B) "Recovery-based shelter" means shelter that provides optional recovery systems that are client-driven and support social integration, support services and respect for individuals, and as may be further defined by the department by rule.

(7) The department shall review each submitted regional assessment, plan and report for compliance with program requirements and alignment with the state homelessness response. The department may approve, approve with conditions or request changes and resubmission of a proposed regional assessment. The department, in its discretion, may withhold program funding to a regional coordinator until the approval of the regional assessment, plan or annual report.

(8) In providing funding to the regions through the program, the department shall establish a funding formula that considers:

- (a) Needs of the region; and
- (b) Past performance of the region.

(9) The department shall establish a formal grievance system to review, track and mediate disputes between shelter providers and regional coordinators. The grievance system may not issue orders or otherwise adjudicate disputes.

SECTION 3. The Housing and Community Services Department shall:

(1) On or before January 1, 2026, adopt rules to administer sections 1 and 2 of this 2025 Act.

(2) On or before May 1, 2026, select regional coordinators.

SECTION 4. Sections 1 and 2 of this 2025 Act are repealed on January 2, 2034.

SECTION 5. This 2025 Act being necessary for the immediate preservation of the public peace, health and safety, an emergency is declared to exist, and this 2025 Act takes effect on its passage.

Passed by House June 23, 2025

.....
Timothy G. Sekerak, Chief Clerk of House

.....
Julie Fahey, Speaker of House

Passed by Senate June 26, 2025

.....
Rob Wagner, President of Senate

Received by Governor:

.....M.,....., 2025

Approved:

.....M.,....., 2025

.....
Tina Kotek, Governor

Filed in Office of Secretary of State:

.....M.,....., 2025

.....
Tobias Read, Secretary of State

Statewide Shelter Program Rules Advisory Committee Feedback – Debrief Summary

Statewide Shelter Program (SSP) contact:

HSD.HomelessServices@hcs.oregon.gov

Rules Advisory Committee (RAC) facilitator contact:

Rachel.Bennett@hcs.oregon.gov

Rules Advisory Committee Feedback Received on Draft Rules

Eligible Shelter Types & Services

Question: Does the manual have any exclusions as it relates to STEPS?

- **Response:** Yes, the manual outlines specific requirements for STEPS.

Suggestion: Prefer language “working towards permanent housing solutions.”

- **Response:** See page 4-5 for case management responses.

RAC Feedback: I appreciate the conversation around the case management. There is that difference that case management can be optional and progressing towards someone's identified housing goals. There's a difference, and it goes back to what a low-barrier shelter looks like and that folks should be progressing in whatever way they've identified for themselves. For some people, it could be enormous steps forward; for others, it could just be baby steps.

- **Response:** See page 4-5 for case management responses.

RAC Feedback: I heard mixed feedback about optional case management being in direct contrast to housing-focused shelter services. There was a lot of conversation about case management, specifically the requirement to participate in it and how other shelters felt the need to. Or regional coordinators of we need some like that is in direct contrast to the housing focused shelter that you all have defined in the shelter definitions. Folks need to continue moving towards a housing resolution to stay in our shelters and that may look different for every single person. But you can't just stay in shelter indefinitely and continue receiving services. We need to have folks engaged in case planning with us.

- **Response:** See page 4-5 for case management responses.

Clarification needed: Clarify the difference between basic overnight shelter and hotel/motel voucher use, as some agencies operate shelters out of hotel/motel sites.

- **Response:** OHCS recognizes hotel/motel voucher programs can fall into either basic overnight shelter or housing focused shelter. To avoid confusion, OHCS will remove the example of hotel/motel voucher under basic overnight shelter.

Suggestion: Clarify what constitutes “secure” for STEPS.

- **Response:** Secure refers to the site management plan which outlines how the program will monitor the safety and security of the site and its participants, staff, and volunteers. STEPS must meet the minimum requirements of standards of habitability, amenities, and services outlined in the manual. Note: STEPS do not require onsite security.

Suggestion: Is it possible to change language from having shower facilities on site to “access to shower facilities”? We have programs that could qualify that have shower facilities next door, technically on a separate site, but nearby.

- **Response:** OHCS will incorporate this feedback into the program manual.

Suggestion: We have the same question about onsite versus nearby when it comes to food preparation. We had to dismantle our commercial kitchen, but we do have access to prepare meals while our kitchen is under construction.

- **Response:** This would meet the proposed requirements. Shelter operators would need to have food preparation facilities onsite, or meals provided to participants, which could be prepared off-site.

Suggestion: The draft rule largely covers what we talked about in the workgroup regarding STEPs. There was additional language in the shelter workgroup regarding the availability of potable water on site, possibly including arrangements for water delivery. Access to onsite electricity would also include alternative strategies for ensuring that residents can recharge devices on site, not necessarily electricity in each individual space. I want to make sure the rule interpretation will be the way it was in the final report.

- **Response:** OHCS will update the program manual to clarify that electricity does not need to be provided directly to each basic free-standing structure or vehicular camping space for STEPS.

Minimum Habitability and Service Requirements:

Habitability standards at vehicular STEP sites: The workgroup recommendations specified that vehicles supplied by the participants can be used. Alterations to

vehicles to provide walls/roofs, heating/cooling, etc., may be a barrier or prevent some households from accessing services.

- **Response:** Under STEPS, the requirements of hard-surface floors, weatherproofing, and the ability to close and lock a door apply to basic free-standing structures and do not apply to vehicles supplied by the participants. However, all STEPS programs must meet the other minimum requirements outlined in the program manual.

Remaining Questions: Would Conestoga Huts qualify under STEPS?

- **Response:** Huts, such as Conestoga Huts, may qualify as a basic-free standing structure, which means an alternative to traditional shelter that meets either shelter criteria or STEPS criteria, depending on features, standards, and amenities. These structures typically do not include a foundation and are assembled with pre-fabricated parts and materials. Examples include pallet shelters, Conestoga Huts, yurts, and other tiny home models.

Question: Does the requirement of a door that locks apply to the shelter as a whole or to individual rooms?

- **Response:** The lock requirement applies to basic free-standing structures. There is a CFR standard for shelters that require adequate space and security for shelter participants and their belongings. OHCS wanted to specify the requirement of a locking door for a basic-freestanding structure because these structures are not set inside an existing building. The expectation is that any shelter meeting the criteria would have secure doors, but this is called out specifically for basic-freestanding structures like a cluster of pallet shelters or tiny homes.

Question: Are heating and cooling included in the CFR?

- **Response:** Yes.

Suggestion: Clarification of what level of electricity is required would be helpful. Some sites—specifically, those using only cars—may not need electricity, as cars are not designed for hookups; however, alternative strategies for charging devices, etc., may be necessary.

- **Response:** STEPS programs are required to provide access to electricity onsite and adequate lighting. There must be sufficient electrical sources to permit the safe use of electrical appliances. However, electricity does not need to be available to each individual space.

Policies Regarding Low-Barrier

RAC Feedback: Is accommodating pets optional or required? If shelters are given the option to not allow pets, many will choose not to even if they can. I have had this conversation with ES operators across the Balance of State, and many don't want to take pets even if they have the capacity to do so. Maybe require shelters to apply for an exception to the pet requirement, rather than just making it optional from the beginning.

- **Response:** This was based on feedback OHCS received in engagement that many shelters can't accommodate pets due to insurance requirements, space issues, or other challenges. OHCS is revising the program manual to reflect that shelters are required to accommodate pets with exceptions needing approval through the regional coordinator. Note: All shelters must accept service animals.

Suggestion: Clarification on whether a shelter can limit access for pets would be helpful. The workgroup recommendations specified that access for pets is required.

- **Response:** See response above regarding animal policy.

Suggestion: There needs to be some definition of when the denial of accepting pets is okay and when it is not.

- **Response:** See response above regarding animal policy.

Suggestion: If engagement can be required, it could be framed similarly to the pet discussion (when and how can shelters require that).

- **Response:** See pages 4-5 for response on case management.

Suggestion: Require shelters to apply for an exception instead of making it optional by default.

- **Response:** See response above regarding animal policy.

Question: Are low-barrier shelters allowed to have maximum stay limits or requirements for engagement in housing plans in order to extend stays?

- **Response:** Low-barrier shelters and sites are not allowed to have maximum stay limits. Additionally, low-barrier and non-exclusionary sites may not require sobriety, treatment, and participation in case management services, including engagement in housing plans to extend stays.

Suggestion: The language around any potential trespass of timebound service restrictions helps shelter service operators. For health and safety reasons, we do have to have that immediate exit for other community members that are on

staff. This language is very clear regarding what steps to take. Regarding the appeals process, for our organization, if it's a threat to other community members, we do have to immediately remove that person from the property and hand them information about the appeals process, but we don't keep them in the shelter when they pose a risk to other community members. I do think this language is clear in that regard. Involuntary exit should be for violence and things that are related to health and safety.

- **Response:** OHCS agrees that violence or threats to health and safety may be a reason for an involuntary exit. OHCS will review the program manual and determine if further clarification is needed to acknowledge that shelters may exit someone from the program and ask the participant to leave the premises if they pose a health and safety risk, even if the participant has not yet submitted an appeal of the exit decision.

Question: What about self-identification of who family members are?

- **Response:** Self-identification of family members is addressed in the definition of "households" which includes an individual living alone, family with or without children, or a group of individuals who are living together as one economic unit.

Suggestion: Policies should remain as black-and-white as possible to avoid varied interpretations.

- **Response:** OHCS appreciates this feedback and is striving to strike a balance of being clear without being overly prescriptive.

Comment: Lack of participation in case management services feels in contrast with the definition of housing-focused shelter.

- **Response:** Housing focused shelters provide case management and supportive services, including the development of an individualized housing service plan (IHSP) or similar plan with the participant. Additionally, low-barrier shelters may not require shelter guests to participate in case management services. The distinction is that housing focused shelters must offer case management services to its participants, but participation in case management is voluntary for shelter guests.

RAC Feedback: I agree with the suggestion to remove the requirement that case management participation be optional. Instances where involuntary exit can be applied are addressed in other sections, and this was not a recommendation of the workgroup. I recommend considering language that

states “lack of participation in case management cannot be grounds for involuntary exit”

- **Response:** Please see the response above regarding case management.

Suggestion: Address case management in exit policy instead of low-barrier criteria.

- **Response:** Please see the response above regarding case management.

Suggestion: Clarify if low-barrier shelters can require engagement in housing plans for extended stays.

- **Response:** Low-barrier shelters and sites are not allowed to have maximum stay limits. Additionally, low-barrier and non-exclusionary sites may not require sobriety, treatment, and participation in case management services, including engagement in housing plans in order to extend stays

Clarification needed: Does prohibition on abstinence-based requirements mean they're *not best practice* or that grantees *cannot* impose them?

- **Response:** Low-barrier means programs cannot require sobriety or treatment. However, a shelter or STEPs site that requires sobriety or drug and/or alcohol treatment may be considered recovery-based.

RAC Feedback: We currently do not ask people to “abstain completely” (draft manual language); however, we ask that they not have drugs or alcohol on the premises. Also, how does this requirement intersect with federal law/HUD requirements re: drugs?

- **Response:** The requirement to not allow drugs or alcohol on the premises is allowable under the low-barrier policy. OHCS will clarify in the program manual that the limit of drugs and alcohol may apply to the entire premises and not just common or shared areas. Additionally, shelters must follow local, state, and federal laws. OHCS will continue to monitor changes at the federal level that may impact these requirements.

Question: Is it okay to limit possession/use on site? How does this align with federal law/HUD requirements?

- **Response:** See the response above.

RAC Feedback: Roseburg operates a 20-family shelter. For my team, the language is fairly good, but we have a goal that our shelter is safe for all families. Some families have child welfare services as part of their life, so the potential allowance of alcohol and drug use creates complexity with those families that are also navigating child welfare concurrently. The language around may

establish behavioral expectations that limit it, but maybe there could be further carve outs for DV/SA shelters around alcohol and drug use.

- **Response:** The intention of low-barrier policy is to meet people where they are and remove as many barriers to access shelter as possible, including sobriety requirements. Based on other feedback, we will update the low-barrier policy to clarify that shelters may limit the use of drugs and alcohol anywhere on the premises. Ensuring the safety of everyone is paramount to shelter policies. Shelters must ensure their admissions, occupancy, and operating policies and procedures protect privacy, health, safety, and security. At this time, OHCS will not have sobriety requirements carveouts for DV/SA shelters, but our intention is that the changes in the program manual will help address some of the safety concerns raised. Additionally, DV/SA shelters with sobriety requirements may still qualify as a recovery-based shelter.

Question: Clarify applicability for DV/SA shelters.

- **Response:** See the response above.

RAC Feedback: Please reflect the tension between low-barrier access and housing focused shelter.

- **Response:** Housing focused shelters provide case management and supportive services, including the development of an individualized housing service plan (IHSP) or similar plan with the participant. Additionally, low-barrier shelters may not require shelter guests to participate in case management services. The distinction is that housing focused shelters must offer case management services to its participants, but participation in case management is voluntary for shelter guests.

Grievance System Between Regional Coordinators and Shelter Operators:

RAC Feedback: This is to establish a statewide emergency shelter (ES) system; therefore, there should be clear direction about the baseline for how the state would like it to be managed.

- **Response:** OHCS will update the grievance system to reflect the scope is limited to disputes related to the interpretation and/or implementation of the program manual, which may include the regional plan. The purpose of the grievance system is for OHCS to review, track, and mediate disputes between program provider subgrantees and regional

coordinator subgrantees. OHCS will respond to grievances; however, the grievance system may not issue orders or otherwise adjudicate disputes

RAC Feedback: It is important that the scope of what can be grieved is clearly defined within the operations manual. For example, you can't grieve because the theme color was purple; it doesn't have anything to do with the operations.

- **Response:** See response above.

RAC Feedback: I participated in the initial work group, and I recall that the city of Eugene provided a comment on the topic of grievances. It was really about how we're shifting into a regional approach. What's that role? How does OHCS navigate grievances that may arise between shelter holders, shelter providers, the defined cities, and regional entities? Initially, it wasn't just operational issues that were coming up in a potential contract, but also how that regional plan is formed, what's included in the regional plan, and making sure that there's an inclusive aspect for the regions of the community's needs. And so that was kind of where the city had put our interest in having like, what's a grievance process if a region is having challenges trying to come to an agreement of con plan or plan that's being adopted doesn't incorporate all of those elements, how? Does one navigate that? I would ask that it doesn't get lost within moving from the work group to the statute.

- **Response:** See response above.

Question: What is the written summary based on? What's the basis of the decision-making standard?

- **Response:** See response regarding review of the grievance system between Regional Coordinators and shelter operators.

Suggestion: The scope of grievances should be clearly named and listed.

- **Response:** See response regarding review of the grievance system between Regional Coordinators and shelter operators.

Suggestion: Keep language black-and-white to avoid excessive grievances.

- **Response:** See response regarding review of the grievance system between Regional Coordinators and shelter operators.

Policy Regarding Exit and Separation from Shelter Services:

RAC Feedback: These policies could potentially create more equitable shelter exits. The program manual says to refer to the grievance appeals section on page 7. If a shelter operator must involuntarily exit someone, is the notice of a 30-day appeal given and the person remains in shelter for the 30 days, or are they provided documentation about their right to appeal within 30 calendar days? I'm confused about the logistics of this appeal process. There's confusion about establishing residency rights and what avenue to proceed down when you need someone to exit due to health and safety risks. The appeals language could add to confusion around the rights of shelter operators when needing to exit someone in a dangerous or unsafe situation.

- **Response:** In case of an involuntary exit, programs must inform participants of the appeals process. The expectation is not that the participant will stay in the shelter for the 30 days while awaiting an opportunity to appeal. Programs may exit someone from the program and ask the participant to leave the premises if they pose a health and safety risk.

Funding Formula

Question: Can you explain how this process accounts for the HB 3644 requirement that contracts with Regional Coordinators are five- to six-year periods? It looks like the first period of funding is for one fiscal year.

- **Response:** Regional Coordinators will be selected for a five to six-year period. The funding formula specifically calls out July 1, 2026, to June 30, 2027, which is the first year in which the regional coordinator model is operational. HB 3644 requires OHCS to include need and performance as factors in the funding formula, and OHCS is proposing that performance is not included in the first year of the regional coordinator model in order to establish a baseline. However, OHCS may remove the mention of July 1, 2026, to June 30, 2027, to avoid confusion.

Comment: I have concerns about the PIT Count, since not all CoCs do unsheltered counts every year or put the same level of energy into the PIT.

- **Response:** If we use PIT data, it would only be in odd-numbered years when a full count is done.

A concern for rural providers: PIT is harder in rural areas and does not accurately reflect the real need for shelter services, resulting in rural providers being underfunded. Additionally, rural providers offer more comprehensive services, as they are often the sole resource in their area, which is more resource-intensive.

- **Response:** We have heard this concern frequently, which is why there are several other potential factors. If used, the PIT would likely be a small part of the formula.

Comment: There needs to be further clarity about shelter utilization and about shelter beds vs. shelter units. Family beds may have beds open because another family isn't able to move in, but they appear open.

- **Response:** OHCS intends to measure beds and units separately to determine shelter utilization rate. OHCS intends to have more engagement around the funding formula, including shelter utilization.

Comment: If we are looking at bed utilization, there needs to be a standardized way that we count beds.

- **Response:** Yes, we agree.

Question: Will subgrantees receive goals for bed utilization, exit to housing, etc.?

- **Response:** Regional Coordinators will have goals for permanent housing placements. OHCS is still exploring whether regional coordinators will need goals for shelter utilization.

Comment: OHCS should not carve out their ability to directly fund shelters. If the direction is to go with Regional Coordinators, they should commit to that model and work with Regional Coordinators.

- **Response:** OHCS intends to use the Regional Coordinator model to distribute Statewide Shelter Program funds. However, OHCS reserves the ability to direct award funds at our discretion.

Suggestion: Regional Coordinators should have more direct access to shelters to better understand program budget needs and how services fit into the local emergency response system.

- **Response:** OHCS agrees and intends to use the Regional Coordinator model to distribute SSP funds. See the response above.

Suggestion: Locally, we utilize the percentage of exits that exit to permanent housing, rather than percentage of total served that exit to permanent housing. It is a small wording difference, but it changes the calculation. I would suggest using the percentage of exits that exit to permanent housing.

- **Response:** OHCS will make the change to the funding formula to reflect the percentage of exits that exit to permanent housing.

Question: Will OHCS provide the funding formula? Having the ability to review the factors considered and how they were weighted in the funding process is a transparent way for providers and regions to better understand priorities.

- **Response:** Yes, absolutely. We will have continued engagement on it, particularly around the past performance piece. We will have a Request for Applications to identify Regional Coordinators. Once the Regional Coordinators are selected, which will help determine the regions, we can develop the funding formula, continuing to seek feedback.

Feedback on Draft Impact Statements

Fiscal Impact

Comment: Highly support the greater percentage for administrative costs (15%), but 20% would be ideal.

- **Response:** OHCS is unable to increase to 20% at this time.

Question: Does this impact the admin rate for 2025-26?

- **Response:** No.

Small Business Impact

Comment: The estimated number of small businesses impacted (100-150) seems low because emergency shelter will impact CAAs, CCOs, DV and youth providers, housing authorities, and all smaller direct service housing providers and drop-in centers.

- **Response:** OHCS will do further analysis on the number of small businesses impacted.

Comment: As funding has decreased, the number of small businesses impacted may also decrease.

- **Response:** OHCS will take this into consideration.

Cost of Compliance

Question: Could administrative funds be used to hire a consultant or employee to develop the regional plan? It states here that no third-party professional

services were anticipated; however, programs may need to utilize those services for this plan development if capacity is strained.

- **Response:** These costs are also eligible under capacity building as technical assistance.

Comment: Insurance is a third-party professional service.

- **Response:** OHCS will update the impact statement to say that some third-party professional services are anticipated.

Comment: Administrative costs could include legal, communications, governmental relations, and public health, in addition to the programmatic compliance work.

- **Response:** OHCS will update the impact statement to reflect these costs.

Comment: Data collection should be an included cost.

- **Response:** OHCS will update the impact statement to reflect this cost.

Racial Equity

Rules Advisory Committee agree with drafted statement: This statement looks thorough and great; however, I am not from an impacted community.

RAC Participants' Feedback Provided After the RAC Meeting

List of all other questions or feedback received by the deadline for RAC members to submit feedback to OHCS. Efforts have been made to maintain the text of email feedback, but minimal edits were made to protect personal information and in the interests of clarity.

1. Email Received

Sent: Wednesday, September 3, 2025 11:14 AM

To: HSD Homeless Services * HCS

[<HSD.HomelessServices@HCS.oregon.gov>](mailto:HSD.HomelessServices@HCS.oregon.gov)

Subject: RE: Statewide Shelter Program - Rules Advisory Committee Meeting Materials

Good morning – when you get a moment, would you mind sharing the link to the video replay from yesterday's RAC meeting? I'd like to share it with our team. Thank you so much.

Respectfully,

Mickie Derting | Housing Programs Director
Central Oregon Intergovernmental Council

Response: OHCS uses the RAC recording for purposes of recording notes, reports, and engagement summaries. Currently, the recordings are not available for external purposes.

2. Email Received

Sent: Wednesday, September 3, 2025 2:17 PM

To: HSD Homeless Services * HCS

[<HSD.HomelessServices@hcs.oregon.gov>](mailto:HSD.HomelessServices@hcs.oregon.gov)

Subject: Re: Statewide Shelter Program - Rules Advisory Committee Meeting Materials

Good Afternoon,

Was yesterday's meeting recorded?—I am working through the Manual and would like to hear what was discussed at the meeting.

Best Regards,—Cindy

Celinda A. Timmons

Umatilla County Commissioner

Response: See response above regarding recordings.

3. Email Received (OHCS' responses within)

Sent: Monday, September 8, 2025 2:19 PM

To: HSD Homeless Services * HCS [<hsd.homelesservices@hcs.oregon.gov>](mailto:hsd.homelesservices@hcs.oregon.gov)

Subject: Statewide Shelter Program Ops Manual Feedback

Hello,

Below is feedback from Lane County regarding the Statewide Shelter Rules and Operations Manual.

Please feel free to reach out if you have questions.

Thank you,

-Kate

Kate Budd | she, her, hers |

Human Services Division Manager | Lane County Human Services Division

Statewide Shelter Program Administrative Rules

- Definitions (12 – page 2) – specify what “secure” means. For example, is it a locking door, on-site security, in a building, etc.
 - **Response:** Secure refers to the site management plan which the program will outline how it will monitor the safety and security of the site and its participants, staff and volunteers. STEPS must meet the minimum requirements of standards of habitability, amenities and services outlined in the manual. Note: STEPS do not require on-site security.
- Administration
 - (1 -page 2) With the identification of Regional Coordinators across the state, OHCS should refrain from entering into agreements with SSP providers and not leave it open for them to circumvent coordinators.
 - **Response:** OHCS intends to use the Regional Coordinator model to distribute SSP funds. However, OHCS reserves the ability to direct award funds.
 - (1 – iii- page 3) Homelessness count measured by most recent validated count. Reword for greater clarity & specificity – Point-in-Time Count measured by most recent HUD validated count.
 - **Response:** OHCS would like to leave this open for the possibility of other validated homelessness counts in the future.
 - (1-vii, viii, xi – page 4) Regarding these t factors- regions with few complementary resources would be at a disadvantage.–
 - **Response:** Including “non-state shelter funds” availability as a factor is intended to look at a region’s need and meet mandated legislative parameters.
- Use of Funds (2 – page 4)
 - Encourage separate line items for “Data & Reporting” and “Capacity Building.” In the SSP manual Capacity Building seems to be incorporated into each shelter type versus an independent line item.
 - **Response:** Capacity building is an independent category. Data may be eligible under multiple categories.

Statewide Shelter Program Operations Manual

- (B) General Program Requirements – Page 3
 - (a) Program Standards. Second sentence – Non-compliance will results in audit findings and may jeopardize funding. Replace “will” with “may” for greater flexibility and recognition of extenuating circumstances.
 - **Response:** OHCS will update the manual.
- (xiii) Grantee and Subgrantee Grievance System (page 16)
 - Within the Purpose, identify the allowable scope of the grievance. For example: Grievances must be within the scope of the Shelter Operations manual to be arbitrated by OHCS.
 - **Response:** OHCS will update the grievance system to reflect the scope is limited to disputes related to the interpretation and/or implementation of the program manual, which may include the regional plan. The purpose of the grievance system is for OHCS to review, track, and mediate disputes between program provider subgrantees and regional coordinator subgrantees. OHCS will respond to grievances; however, the grievance system may not issue orders or otherwise adjudicate disputes.
- (xv) Low-Barrier and Non-exclusionary Services Policy (page 18-19)
 - Please identify what is allowable and is not allowable for low-barrier shelters. The more grey the guidelines the more challenging it is for regional coordinators to uphold actual low-barrier shelters.
 - (1) Agree “...sobriety, treatment, and participation in case management services...” must be voluntary to be a low-barrier shelter.
 - Shelters resident may be required to follow an agreed upon and regular updated–housing plan and if progress does not occur, a process, up to and including shelter exit, may be followed.
 - **Response:** See pages 4-5 for response on case management.
 - Encourage chores/work be added to the list of voluntary conditions for low-barrier shelters.
 - **Response:** OHCS will clarify that low-barrier programs cannot require participants to complete chores or work.
 - (2)–For greater clarity suggest – Low-barrier and non-exclusionary sites may establish requirements that are aligned with creating safe and respectful environments for all. This means anyone who is acting in an unsafe or disrespectful manner may be asked to change their behavior and experience repercussions up to exclusion. This may include drug/alcohol use in a public area,

violence toward another person or using/leaving paraphernalia in plain sight.

- **Response:** OHCS agrees that creating a safe environment is paramount to all shelters and services. The program manual requires SSP programs to ensure their admissions, occupancy, and operating policies and procedures protect privacy, health, safety, and security. The reasons for involuntary exits should be addressed in the exit and separation from services policy.
- (xvi) Recovery-Based Sites (Page 19)
 - o Add a condition specifying the agency must have a policy that recognizes recovery is not a linear process and specifies when someone may re-enter the shelter, if exited due to substance abuse. A lapse in recovery should not always equate to a program termination.
 - **Response:** Grantees and/or subgrantees should address this in their exit and separation from service policy, including but not limited to reasons for exits, timebound service restrictions extending beyond one night, and how involuntary exits should be taken only as a last resort in the most serious cases to protect the health, safety, and respect of participants, staff, and volunteers.
- C) Eligible Shelter Types (page 21/22)
 - o (ii) Safe Temporary Emergency Placement Sites
 - Support that the language of “transitional shelter” has been dropped.
 - **Response:** OHCS appreciates the feedback.
 - Surprised to see the STEPS (Alternative Shelter) set as a Street Outreach project type. It does not seem to meet the definition for Street Outreach projects outlined in the [data standards manual](#). Lane County currently has all of these projects set up as Supportive Services Only. If this is implemented, locally all projects that receive this funding would need to be ended and all clients would get a new enrollment in Street Outreach. Any of these “new” projects would be included in some of the metrics for the SPMs and could create an artificial increase in returns to homelessness, and may make our “successful exits from SO” metric misleading. This could have a major negative impact on these SPMs and it would make local data hard to interpret – similar to when the EO upgraded a lot of programs to make “new” shelter beds.

- **Response:** OHCS will make the change for STEPS programs to be Supportive Services Only projects.
- Additionally, the way the CAPER and APR evaluate Street Outreach projects is to consider any exit that is not place not meant for habitation as a success. I think this would exacerbate the disagreements we have been having around what is considered a successful exit from a shelter program, because it would vary for different projects under the same funding stream.
 - **Response:** See response above regarding STEPS.
- One of the allowable program components (pg 25) is Street Outreach and talks about services for non-residents. This is another reason to not set up an “alternative shelter” as a Street Outreach project. Are all folks enrolled in these projects residents of the program or not? It is not advised to mix these two together in the same project because it will be extremely hard to track outcomes, utilization, length of stay, etc. Rather, require a Services Only project to track participants living onsite, and a Street Outreach project to track true outreach services.
 - **Response:** See response above regarding STEPS.
- (d) Regional Coordination, Assessment & Plan Requirements
 - o (ii) Regional Assessment & Plan (page 23). “For any additional subgrantees, changes to the subgrantees or removal of subgrantees outside of the regional plan, grantees must notify OHCS in writing and receive approval.”—This clause reduces the flexibility and nimbleness of the regional coordinator, especially if approval is needed.
 - **Response:** OHCS must be notified of any changes in shelter operations and bed capacity for reporting purposes and to meet legislative intent of maintaining shelter capacity and focusing on no net loss in beds. Grantees should proactively work with the Contract Administrator if they anticipate challenges or changes with subgrantees before approval is needed.
- (D) Allowable Program Components & Costs
 - o (a) General Guidance (page 25)
 - “Grantees must engage with coordinated entry systems *whenever possible*.” This should be a requirement without a loophole.
 - **Response:** OHCS recognizes that coordinated entry systems vary across Oregon, and there may be regions where coordinated entry is still under development. However, we will update the manual that grantees

may require program providers to participate in coordinated entry.

- o (b) Street Outreach
 - (1-iii) Unallowable costs for Street Outreach—(Page 28) (6) “Phone purchase for individuals” – Providing burner phones with pre-paid minutes for outreach clients is invaluable to reach them and connect them to supports, especially in communities where encampments are disrupted often.—Would encourage this be an allowable cost.
 - **Response:** OHCS will incorporate this feedback.
- o (d) Shelter Operations
 - (ii – 7) “Equipment purchases...” (page 33)
 - Allow for equipment rentals too – very common for port-potties and storage, for example.
 - **Response:** OHCS will incorporate this feedback.
- (F) Data, Submissions and Reporting Requirements (page 43)
 - o (A) “...enter data within three business days after a service...” This is very burdensome for shelters (and outreach projects). Recommend the 3 day requirement for shelter stays (aka enrollment and exit). Entering services within 14 days, or by the 20th of the following month is much more reasonable for the other components.
 - **Response:** The 3-day requirement for data entry is a long-standing practice for data quality and integrity. OHCS is unable to change the requirements on data timeliness.
 - o (B) Service Transactions
 - “Each allowable service must be represented with a Service Transaction” is an extremely burdensome requirement, particularly if some of these projects will be providing true Street Outreach services. It is much more reasonable to expect service transactions for all of the direct financial assistance examples they provide in that section. We have many providers choose to document Case/Care Management (or who record at least 1x/month) but especially if folks are living onsite, many of these services are provided daily and it is a lot of extra staff time.
 - **Response:** OHCS is revisiting the requirement of each allowable service represented with a service transaction. There will still be a requirement to include service transactions that involve financial assistance (e.g. deposits, applications).
 - o (C) Required data elements (page 45)

- (f) Submissions/Reporting Requirements. "At the discretions of OHCS, other reports can be required when deemed necessary by OHCS and grantees are subject to such requirement. Considering the requirements coming down from the Federal level it feels important to narrow this statement to only include reports related to OHCS funded shelter programs.
 - **Response:** The requirements outlined in SSP rule and program manual only pertain to SSP.
- Bi-annual Housing Inventory Chart. The Street Outreach projects, including STEP programs, based on the current guidelines, will not be included in the HIC.
 - **Response:** OHCS agrees and is aware these projects are not included in the HIC.

4. Email Received

Sent: Monday, September 8, 2025 3:17 PM

To: HSD Homeless Services * HCS <hsd.homelesssservices@hcs.oregon.gov>

Subject: Re: Statewide Shelter Program RAC Follow-up

Thank you for reaching out to me as a follow-up prior to the deadline. I greatly appreciate the opportunity to share insight of our agency's history and thoughts on success. I have included two key team members here on this reply. They may chime in with further thoughts which I could relay as well.

I am glad you have shared the conditions again in full. I believe they were not this fully spelled out in the program guidance document draft but were spelled out like this on the slide during the RAC meeting. I could be wrong, but these were the conditions/proposed rules I was commenting upon in the meeting.–

For our agency's insight, we have operated our shelter to meet many/most of the conditions below. I believe my comments were to highlight how when folks are fleeing/attempting to flee domestic violence and are shelter clients, the stakes are higher. I feel this is honored with the 'carve-out' in the guidance where DVSA shelter sites are allowed to meet the 'low-barrier and non-exclusionary site' criteria while also being able to limit access individuals with histories related to sex offenses.

With these higher stakes acknowledged for our unique situations as shelter providers, I was curious if it was possible to add another caveat to that 'carve-out' in condition number six that we could also limit usage of substances by all individuals at the shelter site, even those with certain alcohol and drug treatment needs. Our shelter operates to meet guidelines set by the DOJ as a crime victim services provider and we have a high bar of safety considerations we must provide all shelter residents. We also may have a shelter client who may have children and may also have involvement with ODHS Child Welfare in their lives. Ensuring these clients can remain in our confidential shelter to protect them from the elements of their fleeing/attempting to flee situation and stand a firm ground with child welfare, they may need a living location free from the woes of those navigating alcohol/drug dependence by using substances behind their closed door in relative proximity to the other clients. In short, the additional language I believe we were looking to add to condition number six was an ability to exclude usage on-site (closed door or not) of alcohol and drugs at this unique type of shelter sites. We take in any clients, and meet them where they are at, but the activities undertaken on our premises are the concern. We wish to provide a high level of safety for the high-level stakes we achieve for many types of clients we serve at our shelter.

One thought to highlight my thinking, wouldn't it be prudent and common to consider the SSP protocol would want a youth shelter to meet the requirements of 'low-barrier and non-exclusionary' AND be also able to exclude use of alcohol/drugs on their premises? It seems youth, family, and DVSA shelters all have these high stakes client types and need this rule to include their ability to set firm parameters on the activities conducted on their premises while also maintaining their status as 'low-barrier and non-exclusionary' given they provide secular and inclusive programming.

Hope this helps, please let me know if you require further explanation here. I really do appreciate the follow-up and the chance to fully explain my thought from the meeting.

Cheers,

Thomas McGregor (he/him)
Youth and Housing Project Manager
Peace at Home Advocacy Center

- **Response:** OHCS appreciates this feedback and agrees that ensuring the safety of everyone is paramount. The intention of low-barrier policy is to meet people where they are and remove as many barriers to access shelter as possible, including sobriety requirements. We will update the low-barrier policy to clarify that shelters may limit the use of drugs and alcohol anywhere **on the premises**. Shelters must ensure their admissions, occupancy, and operating policies and procedures protect privacy, health, safety, and security. At this time, OHCS will not have sobriety requirements carveouts for DVSA or youth shelters, but our intention is that the changes in the program manual will help address some of the safety concerns raised. Additionally, shelters with sobriety requirements may still qualify as a recovery-based shelter.

5. Email Received

Sent: Tuesday, September 9, 2025 9:40 AM

To: HSD Homeless Services * HCS <hsd.homelesservices@hcs.oregon.gov>

Subject: RE: Statewide Shelter Program - Rules Advisory Committee Follow Up

Good morning,

My comments on the proposed rules, manuals, etc., are below. Some of these comments relate to questions raised last week; others pertain to external conversations happening about this new system design.

Some of us have been involved in the discussion about the **Statewide Shelter Workgroup**, the limitations of previous models, **House Bill 3644** (and the Governor's vision and Legislative intent) for nearly two years. Others have recently joined the conversation. Therefore, I think it's important to clarify what led to this legislation and why the Shelter Work Group report was organized the way it was.

State Matters:

Homeless sheltering, as a concept, was not widely financially supported at the state level before 2020. We have had the **State Homeless Assistance Program (SHAP)** since 1987, but that fund has historically been very small. For example, in 2019, SHAP was about \$5 million annually statewide. Areas with significant state-supported sheltering today, like Jackson County, received only a one-year allocation of \$309,870 in 2019. Marion/Polk had \$522,457, and Columbia/Clatsop/Tillamook had \$214,862 to spend on sheltering. There was simply no substantial state investment in sheltering

before the pandemic. Consequently, like current food banking issues, most sheltering activities were funded by cities or through private charities, such as the Union Gospel Mission model. The purpose and function of sheltering under those models differ greatly from today's state-supported systems. Those models mainly served the interests of social control—removing the homeless to address public safety—or religious motives like conversion. Both created high-barrier shelters and contributed to the unsheltered crisis they aimed to address. Usually, homeless individuals do not shelter for three reasons: they want to keep their dog, stay with their partner or family, or cannot meet sobriety requirements. These older sheltering systems in Oregon could not meet this need. When they failed, the easy, often self-serving approach was to blame the homeless as addicts, deviants, or the most damaging label—"service resistant."

When the state began supporting the work after 2020, it did so with the goal of ensuring that shelters receiving state funding operated using the most effective, efficient, and research-based systems. Additionally, the state lacked critical operational information about the shelter network and could not answer key questions for local officials and legislators like:

- 1.) How much should a bed cost per night?
- 2.) Are the policies used by the shelters working to reduce street homelessness?
- 3.) Are the shelters connected to housing focused services, or are they simply (and expensively) warehousing people?

To answer these unknowns before the session, Rep Marsh and the Governor assembled a workgroup to tackle those questions and develop a modern statewide sheltering system that would be effective, demonstrate its effectiveness, and justify a historic state investment in these systems. The shelter workgroup labored for months to reach a compromise that addressed key questions about "how we fund," "what we fund," and "how do we know this system works." These were challenging conversations that balanced the needs of local communities with those of the state and, specifically, the dignity and justice of the people served by these systems. The report clearly supported low-barrier models, but also demanded performance in return for the money.

Some of the conversations I've seen circulating around the state on this issue cause me great concern, because they suggest returning to a time when high-barrier models led to a growing crisis of high-need individuals on our streets. These discussions are often exaggerated. Shelter types vary widely, and any oversimplified labeling of shelters as "low" or "high" barrier misses the point. There are three main categories of sheltering styles: dry

shelters (like the Mission model), damp shelters (almost all non-religious shelters remaining in Oregon are damp), and what are often called "wet" shelters. We don't actually have true "wet" shelters in Oregon. I manage 350 shelter beds each night, with emergency capacity for up to 500. This shelter stock includes two project turnkey motels with 75 rooms each, a 75-bed Navigation Center, a family shelter, and two youth shelters. People likely associate our work with housing first principles and low-barrier sheltering, but ultimately, I have to run a business that can be insured.

Our shelters are "damp," meaning residents can stay even with substance issues. They cannot use or possess drugs on the property, which results in exclusion from care. Sober living isn't required, as long as they can go to their room and sleep it off. We constantly encourage residents to connect with services and case management, and we follow a housing-focused approach. However, we do not infringe on civil liberties by forcing individuals into treatment or case management as a condition for a bed. Nearly all non-religiously affiliated shelters in Oregon follow low-barrier, "damp" sheltering practices to varying degrees. The state is not trying to compel local communities and organizations to adopt "wet" shelters, which might ignore onsite drug possession or intoxication if it can't be controlled in that environment.

Federal Matters:

The last concern I have relates to comments I've seen across the state suggesting we should step back from the design and commitment to housing justice and civil liberties for the homeless due to changes in the federal system. These federal priorities might require federal grant recipients to actively support the administration's efforts to criminalize homelessness and enforce immigration policies. Just yesterday, HUD published a new "merit review" sheet (attached) for a special grant competition called "CoC Builds," which requires support for both the criminalization strategy and immigration enforcement.

I believe these threats are real. I also believe that our values—our commitment to decency, democracy, justice, and dignity for our homeless population—are more important than federal grant requirements. It may be the case that CoCs, in particular, should not manage the state system, as doing so could conflict directly with their federal obligations.—If the federal system is moving more toward "housing ready," sobriety, and systems based in shame and punishment, we have to let them go.—That's not a reason to change what we are doing in Oregon, to chase a value system that is not the Oregon Way. It is, in fact, a reason to double down on what we have been doing.

Arguing that we should abandon the work product of the Work Group, our dedication to low-barrier systems, housing justice, Housing First, human dignity, and civil rights in response to external threats is fundamentally weak. Doing so would disregard the work of the Work Group, the legislative intent behind HB 3644, and the Governor's commitment to defend civil liberties in Oregon against these external threats. We cannot live in fear of what might happen, nor abandon our core principles out of concern for potential future issues. And certainly, our values need to mean more than simply surrendering out of convenience.

Respectfully,

Jimmy

Jimmy Jones
Executive Director
Mid-Willamette Valley Community Action Agency

Response: OHCS appreciates the reflection on state investments in shelter, the shelter work group, and federal impacts. The SSP program primarily supports a low-barrier model with 70% of SSP funded shelters and sites to be low-barrier, as described by the shelter work group. OHCS is also closely monitoring federal changes that impact homeless services.

6. Email Received (OHCS' responses within)

Sent: Tuesday, September 9, 2025 10:53 AM

To: HSD Homeless Services * HCS <hsd.homelesservices@hcs.oregon.gov>

Subject: RE: Statewide Shelter Program - Rules Advisory Committee Follow Up

Hello,

Please see attached additional comments/feedback on the proposed Impact Statement, Rules, and Program Manual for the Statewide Shelter Program. Thank you so much for the opportunity to engage in this effort as a member of the Rules Advisory Committee, and for all of OHCS's work on the creation of this statewide framework and robust engagement process since last summer.

Please don't hesitate to reach out if further clarity is needed around any of my comments/feedback.

Thank you,
Regan

Regan Watjus
(she/her/hers)
Homeless Services Manager (AIC) | Community Development | City of
Eugene

Summary of Comments Received:

- Proposed Impact Statements:
 - Cost of Compliance: I feel like this should include something around insurance, as the increasing challenges around obtaining insurance for shelter programs and the increasing costs of coverage have been ongoing points of discussion.
 - **Response:** OHCS will update the impact statement to reflect this cost.
- Draft Rules:
 - Administration (Funding Formula): Locally and I believe for state and federal reporting, this calculation is done by percent of exits, not percent of total served. As opposed to (x) above, I support keeping this as a percent of households served, as that would take into account how many people of the total served are still stabilized in shelter as opposed to exiting to unsheltered homelessness. I would encourage OHCS to also factor in the percent of exiting households who exit to a more stable living situation. This is something we've been tracking in Lane County. It is a broader category than just HUD-defined permanent housing, as it also includes people who transition from shelter to places like transitional housing and long-term care facilities/nursing homes. Specifically, we include everything in the Temporary Situation category of the HUD-CAPER and everything except for jail and hospital in the Institutional Situation category. Given our current housing crisis, taking into account people who move out of shelter into improved situations would give a clearer picture of the performance of shelters.
 - **Response:** OHCS will make the change to the funding formula to reflect the percentage of exits that exit to permanent housing. OHCS recognizes the challenges of housing availability. For purposes of funding formula, the performance is intended to reflect the legislative intent of reducing unsheltered homelessness and housing stability which is addressed by the factors of percentage of exits

- that exit to permanent housing and percentage of those existing to place not meant for habitation.
 - o Use of Funds: [delete sentence re: may not use SSP funds to replace other funds available for the same purpose] This was not part of HB 3644 or something that came out of the Workgroup to our recollection. We recommend removing it to support flexibility at the local level that can ensure support for the various homeless service system needs of our communities.
 - **Response:** SSP funds may be used to supplement existing funds, but they cannot be used to replace existing funds available for the same purpose.
 - o Funding Agreement (Regional Plans): Can you clarify or have more description here about what OHCS's decision-making process will look like? (Like how plans will be evaluated, who does that, what are the criteria used and what will be weighted as they determine funding allocations?)
 - **Response:** Grantees will be required to develop a regional plan after they are selected from the Request for Applications process. OHCS will use a funding formula determine funding allocations.
- o
- Draft Program Manual:
 - o General Program Requirements: Some of the policies & procedures seem a bit verbose or overly prescriptive. I think keeping the program manual focused on essential components and minimal requirements would be helpful, and allowing flexibility on some of the more minute details of how providers execute on those requirements would be appropriate. This is not to minimize the importance of these policies – just in terms of usability and keeping with the theme of flexibility where possible.
 - **Response:** OHCS appreciates this feedback and is striving to strike a balance of being clear without being overly prescriptive.
 - o Re: requirement to document and maintain records of compliance: It seems like this should go at the beginning or end of the section/list of required policies.
 - **Response:** Thank you for this feedback.
 - o Grievance/Appeals: I believe the shelter workgroup suggested that this be made available in Spanish. The Privacy Notice is another one that providers should probably have ready and available in Spanish.

- **Response:** Language access should be addressed in the grantee or subgrantee's Limited English Proficiency policy.
- o Re: Grievance policy components must inform participants they can submit verbal or written grievance and the deadline for responding to a participant's grievance:—I would separate this into its own paragraph – it doesn't flow with the rest of the steps which are about appeals processes. I would think it could go after the paragraph below it.
 - **Response:** Thank you for this feedback.
- o Grievance/Appeals: This paragraph—"OHCS retains the right to require modifications to any policy or procedure that, in its determination, does not meet basic principles or requirements for such a policy/procedure."—is redundant. It is stated above.
 - **Response:** Thank you for this feedback.
- o Nondiscrimination policies: A lot of this section seems to be geared towards housing providers. Can you please remove those parts and/or provide more relevant information for shelter providers? I think the language under How Fair Housing Law applies to Transitional and Shelter Housing Providers on the Fair Housing webpage is really good/clear and helpful.
 - **Response:** The nondiscrimination policies apply to all SSP grantees and subgrantees. OHCS will add fair housing resources specific to shelter and homeless service providers.
- o Re: Example of screening criteria: A shelter giving priority to someone who graduated from a tenant readiness class wouldn't be considered low-barrier. I think this example is probably geared towards housing providers. Can you provide an example more relevant to shelter?
 - **Response:** OHCS will look into this.
- o Limited English Proficiency: I think it'd be helpful to more clearly separate the pieces that apply to the grantee and the pieces that apply to the sub-grantee/direct shelter provider. Are most of the sub-points here meant to only be applicable to the grantee? Are shelter staff supposed to receive external training about assisting LEP persons, or can that be an in-house training around the program's processes and policies?
 - **Response:** The Limited English Proficiency policy in its entirety apply to both grantee and subgrantees. OHCS will further review to answer the question regarding in-house training vs external training.

- o Conflict of Interest: This seems overly long. Can it be shortened and redundancies removed?
 - **Response:** OHCS appreciates this feedback and is striving to strike a balance of being clear without being overly prescriptive.
- o Training: Sourcing these trainings, particularly at the regularity/rhythm prescribed here, poses challenges for service providers. How will OHCS or regional coordinators be expected to help meet this expectation? I would suggest having something more general (like “staff must receive training and have a working knowledge of these principles and practices, and track staff training attendances”? OR provide more support and resources for meeting these requirements.
 - **Response:** Program specific training is an allowable expense under capacity building. Additionally, OHCS will add that program specific training can be an allowable expense under shelter operations and STEPS operations.
 - If training is an allowable Capacity Building expense, is it not allowable as a program or operations expense? If the above trainings are required, I would view that as a Program expense and not Capacity Building
 - **Response:** See response above regarding training.
- o Subgrantee Monitoring (re: subgrantees cannot purchase vehicles with SSP funds): What about outreach or for reasonable operational shelter needs? For example, one of our shelter providers operates multiple shelter sites across the city. Inclement weather shelters also require a lot of logistics and transportation. I would suggest allowing the purchase of vehicles, following the Fixed Assets processes below.
 - **Response:** OHCS will update the program manual and remove mention that subgrantees cannot purchase vehicles. Vehicle purchases require OHCS approval and should follow the fixed assets process.
- o Grantee and Subgrantee Grievance System: I would suggest something between steps 2 and 3 regarding how disputes will be approached, reviewed and processed. Like, what is the basis for decisions/actions and the decision-making standards? Who's reviewing? Basically, what is the written support summary based on (what procedures, criteria, scope, values/goals)? As stated during the RAC meeting, this is not meant to be about mediating individual operational activities or situations but more about planning and regional decision-making processes and coordination.

- **Response:** OHCS will update the grievance system to reflect the scope is limited to disputes related to the interpretation and/or implementation of the program manual, which may include the regional plan. The purpose of the grievance system is for OHCS to review, track, and mediate disputes between program provider subgrantees and regional coordinator subgrantees. OHCS will respond to grievances; however, the grievance system may not issue orders or otherwise adjudicate disputes.
- o Exit and Separation from Services Policy: There was a recommendation from the Data subgroup to require tracking around exit reasons, meant to “improve data quality and allow for more meaningful racial equity evaluation on which populations may be disproportionately exiting shelter and why.” I think if tracking exit reasons is now going to be required (which we support), it would be good to mention it here.
 - **Response:** Data collection requirements, such as exit reason, for FY25-27 will be updated on the Homeless Service Section Dashboard (Link will be updated when the manual is finalized). The exit and separation from services policy addresses that grantees must conduct regular evaluation of all available program data to ensure exit and separation from services decisions do not disproportionately impact Black, Indigenous, and People of Color, and people from historically underserved communities.
- o Low-Barrier and Non-Exclusionary Services Policy: I think “unless otherwise noted below” should be added at the end [of the sentence ending with “services without preconditions”], given that, as stated in the next paragraph, SSP can be used for recovery-based beds on a limited basis. Or maybe this whole paragraph could be removed?
 - **Response:** OHCS will incorporate this feedback to add “unless otherwise noted below.”
- o I don’t know that the housing focus should only apply to low-barrier sites. I think this sentence [“These sites must focus on assessment and triage...”] should be removed. All Housing-Focused (not just low-barrier) SSP sites are meant to connect people to permanent housing as quickly as possible.
 - **Response:** OHCS agrees all housing focused shelters are intended to connect people to permanent housing as quickly as possible. The manual outlines this expectation under the section on housing focused shelters.

- o I suggest that this ["participation in case management services is voluntary"] be removed from this particular section. It has been somewhat confusing for local providers, when it has been interpreted as meaning they can't set expectations for people to engage with case management. I think the idea here could be mentioned in a different way and somewhere else in the document, to be more clear around how shelters can balance housing-focused goals with low-barrier practices. I support the suggestion someone made at the RAC meeting, having "Lack of participation in case management cannot be grounds for involuntary exit" in the above Exit & Separation from Services section.
 - **Response:** Please see pages 4-5 on case management responses.
- o I support the suggestion made at the RAC meeting to allow shelters to apply for an exception to the pet requirement rather than making it optional from the beginning. There should be at least some shelter units available in every region for people with pets, as this is a key barrier that people face.
 - **Response:** Please see page 4 for response on animal policy.
- o Recovery-Based Sites: STEPS should not be in here. STEPS is about habitability, not recovery-based.
 - **Response:** STEPS is an eligible activity under SSP. STEPS has its own requirements on habitability and services. Additionally, STEPS must meet requirements under either low-barrier or recovery-based.
- o Eligible Shelter Types, STEPS, Habitability, and Services Requirements: We recommend revising "Restroom and shower facilities onsite" to "Restrooms onsite and access to shower facilities" (for both STEPS and shelter).
 - **Response:** OHCS will incorporate this feedback in the manual.
- o STEPS requirements and standards: From the Workgroup recommendations: "either on-site or through community partnerships or other plan to provide participants with access to showers." For this and the next two comments, we'd like to make sure that these alternative pathways will be acceptable. It'd be great to make the clear in the document. Re: water availability on-site: include "(may be provided through regular water deliveries if plumbed water is not available or feasible." Re: electricity on-site: include "(alternative strategies for ensuring residents have an opportunity to recharge devices or access electricity are

acceptable, including regular or intermittent opening of nearby facilities to allow for recharging or portable electric generators being made available. Electricity does not need to be available to each individual space)”

- **Response:** See response above regarding access to showers. Regarding electricity for STEPS, OHCS will update the program manual to clarify that electricity does not need to be provided directly to each basic free-standing structure or vehicular camping space for STEPS.
- o Regional Assessment and Plan: Can you please clarify why grantees must identify and receive OHCS approval for all subgrantees through the regional plan? Also, how does it work timing-wise?
 - **Response:** OHCS needs to have awareness of all SSP information, including shelter operations and bed capacity, for reporting purposes and to meet legislative intent of maintaining shelter capacity and focusing on no net loss in beds. Once selected through the Request for Applications (RFA) process, regional coordinators will be required to develop a regional plan where they will outline which agencies and programs they intend to fund. OHCS will provide additional details of the regional plan and RFA in coming weeks.
- o Participant Eligibility – Addendum to Category 1 definition of Housing Status (person or family exiting an institution into literal homelessness is eligible for SSP-funded programs and services regardless of their housing status prior to entering the institution): Does it matter how long they were in the institution?
 - **Response:** The manual outlines an addendum to the Category 1 Literally Homeless criteria. An individual or family exiting an institution into a place not meant for human habitation is eligible to receive SSP funded program and services, regardless of their housing status prior to entering the institution or how long they were in the institution.
- o Participant Eligibility – Oregon Residency: Does this mean that use of SSP funds to support someone not fleeing domestic violence but returning to a confirmed safe housing option out of state (such as reuniting with family) is not allowed?
 - **Response:** OHCS will update the manual to allow for moving costs outside of Oregon for individuals/households who meet any of the eligible housing status. Those who meet Categories 1, 2, and 3 must have a permanent

- housing destination. Those who meet Category 4 (Fleeing/ Attempting to Flee Domestic Violence) are eligible for moving costs outside of Oregon to a safe location.
- o Allowable Program Components and Costs – Street Outreach: What does it mean, “Once a person is a participant, they no longer receive street outreach services and are entered into other eligible categories for financial assistance and SSP services.”
 - **Response:** OHCS will update the manual to remove references to non-participants.
 - o Suggest adding “Cost of insurance required by contract” to list of Allowable Street Outreach Costs.
 - **Response:** Cost of insurance is allowable under capacity building and admin.
 - o Requirements for Shelter Operations: The requirement that grantees using shelter operations funding must meet the low-barrier requirements outlined in the “Low-Barrier and Non-Exclusionary Services Policy” section of the manual is contradictory to the 30% of shelters allowed to be recovery-based.
 - **Response:** OHCS will update the manual that shelter operations must meet the requirements of low-barrier and nonexclusionary policy which requires 70% low-barrier and 30% recovery-based.
 - o Will SSP funds be allowed to be used to set up new sites? If so, please include start-up costs and infrastructure development for new sites as allowable costs.
 - **Response:** SSP funds cannot be used to set up new sites at this time.
 - o Recommend revising Allowable Costs for Shelter Operation as follows: “(2) Utilities (includes water or water delivery systems, sewer or greywater recycling or disposal, garbage, gas, electricity or alternative power sources, internet, and phone) for the shelter facility;”
 - **Response:** OHCS will incorporate these recommendations.
 - o Are general on-site shelter operations staff an allowable cost?
 - **Response:** Yes, general on-site shelter operations staff is an allowable cost.
 - o Re: equipment purchases as an allowable cost: Can we add to this list any permit fees included/necessary, as these upgrades sometimes require permits.
 - **Response:** These are not allowable costs at this time.

- o Suggest removing “portable” from “portable toilet/shower equipment” as an eligible cost, or revising as “on-site or portable.”
 - **Response:** OHCS will incorporate this feedback.
- o Allow shelter unit replacements as eligible equipment purchase.
 - **Response:** This is not an allowable cost at this time.
- o Suggest revising “bed bug treatment equipment/services” to something more broad/general. Something like “Communicable disease and pest prevention and treatment equipment/services.”
 - **Response:** OHCS will incorporate this feedback.
- o What does “Shelter operation costs listed above as they apply to day centers and drop-in service centers” mean?
 - **Response:** This means the shelter operations costs are also allowable for day centers and drop-in service centers.
- o Add “Cost of insurance required by contract” as eligible cost.
 - Cost of insurance is allowable under capacity building and admin.
- o Re: Requirements for STEPS Operations: I think it should just be made clear that of the Shelter and STEPS beds combined, at least 70% have to be low-barrier, and up to 30% can be recovery-based. Again, STEPS is about habitability.
 - **Response:** STEPS, while not considered shelter, is an alternative shelter model that must follow habitability and service requirements. Additionally, 70% of STEPS programs must meet low-barrier requirements, with the remaining 30% as recovery-based.
- o Allowable Costs for STEPS Operations: Please include some of the other things listed under shelter operations that would be applicable here, like data entry, pest management, transportation costs for participants, food, and furnishings. Please also note suggested additions to this list of allowable costs in tracked changes below (mirrors those suggested for shelter sites in previous section).
 - **Response:** OHCS will review STEPS operations allowable costs to consider closer alignment with shelter operations.
- o Need reference or source cited under “Minor maintenance/repairs to STEPS”
 - **Response:** OHCS appreciates this flag.
- o Can you clarify how this [prior written approval from OHCS is required for minor/major rehabilitation activities beyond maintenance/repair] would work in urgent/emergency-type situations?

- **Response:** Grantees may use non-SSP funds to pay for these urgent/emergency type situations. OHCS cannot guarantee that these costs can be reimbursed without prior written approval. Grantees should contact the Contract Administrator explaining the situation and the request.
- o “Hygiene supplies for STEPS participants” is listed twice as an eligible cost.
 - **Response:** OHCS appreciates this flag.
- o Financial Management – Purchases and Procurement – Fixed Assets (Equipment): We would recommend/request increasing this to \$20,000. \$10,000 is easy to get to and to have to go through approvals is unnecessarily onerous for that amount. For example, an ADA ramp we recently had installed at a site was just under \$12,000, and some basic resiliency upgrades to a common space was also over \$10,000 but less than \$20,000. Those types of upgrades should be able to be implemented without an approval process.
 - **Response:** The agencywide threshold is based on OMB guidelines that restrict this to a \$10,000 limit.
- o Financial Management – Administrative Costs: 8% is too low and should be increased. This (insufficient administrative allowances) has been a major theme from providers.
 - **Response:** The administrative costs will be updated to 15%.
- o Records Requirements – Records Access: Why does the federal govt have access, especially to applicant/participant records, since this program is funded through state funds?
 - **Response:** OHCS will consider revising the program manual to clarify the intention is that federal government or other entities would not automatically have access to participant records. These agencies would need to request access for specific purposes and follow existing privacy laws and procedures.

7. Email Received (OHCS' responses within)

Sent: Tuesday, September 9, 2025 2:38 PM

To: HSD Homeless Services * HCS <hsd.homelesssservices@hcs.oregon.gov>

Subject: RE: Statewide Shelter Program - Rules Advisory Committee Meeting Materials

Megan Smith

Operations Director
Sheltering Silverton

- General Program Requirements - overall, the costs associated with compliance with the state requirements should be an eligible part of the core shelter operations expenses OR, if they are only allowable as administrative expense, then the state needs to fully fund the administrative burden placed on organizations by those requirements. Alternatively, Regional Coordinators should be funded to provide these resources (eg: training, LEP resources, IT services) to sub grantees so that smaller orgs are not overburdened with administrative costs.
 - **Response:** OHCS will review the program manual to clarify where these costs can be covered, as some of these may be covered under admin or capacity building. Compliance can also be covered under capacity building.
- Insurance should be considered an operational expense.
 - **Response:** Insurance is an allowable expense under admin and capacity building.
- Cyber Digital Security (Section B: iv) : Cost of maintaining adequate digital security (eg: electronic records, VPN) and insurance coverage should be an eligible operations cost.
 - **Response:** OHCS will update manual to clarify that digital security is an eligible expense under admin. Insurance is eligible under admin or capacity building.
- Limited English Proficiency (Section B: viii) Pg. 10 - Costs associated with accommodating an LEP policy (eg: interpreters, translations, etc) should be added to eligible operations costs.
 - **Response:** OHCS will update the manual to include translation services under operations costs.
- C Eligible Shelter Types (2 Housing Focused Shelter) pg 21 - in order to document housing focused services as part of emergency shelter, please note this will require a change in way shelter data is set up in the HMIS platform. (eg currently housing focused services can not be entered as part of an ES shelter stay. In our case, they are entered in a separate resource center program which is not linked directly to the shelter stays)
 - **Response:** OHCS can provide more information in HMIS guidance.
- iv) Allowable Costs for Shelter Operations 4) Janitorial Supplies pg 30 - may be subjectively interpreted or too limiting. It should be "all supplies essential to shelter operations." (eg office supplies, pest control supplies)

- o **Response:** OHCS will incorporate this feedback.
- E Financial Management:
 - o a) vii) Explain errors in bank records and avoid moving funds between accounts to prevent insufficient funds - as a small organization we have needed to transfer funds between bank accounts to cover cash flow shortages while awaiting reimbursement. This flexibility is needed, unsure of why it should be prevented.
 - **Response:** The intent is to align with fiscal best practices and is not to prohibit or limit transfers.
 - o a) xv) Do not have one individual responsible for determining cost allowability, cost allocation, and monitoring activities (ensure appropriate separation of duties) - again, small orgs have limited admin capacity and can't afford to divide all of these responsibilities. Our org separates 2 out of 3.
 - **Response:** OHCS understands smaller organizations may have limited capacity. Similar to the response above, the intent of this process is to align with fiscal best practices, particularly with separating monitoring activities.
 - o b) Advance Request for funds (pg 37) - If the state wants to really accommodate small organizations (especially those providing access to underserved populations) they should ensure that those orgs don't experience cash flow issues between reimbursements by allowing 1/12 (one month's average) of the contract amount as an advance to be a spend down cushion that doesn't have to be reconciled until the close (final month) of the contract.
 - **Response:** OHCS encourages grantees to reach out to the Contract Administrator if they need an accommodation.
- F Data, Submissions and Reporting Requirements:
 - o (C) Required Data Elements b) Universal Data Elements: If identification is not required as part of our low-barrier and equal access rules for Emergency Shelter, we should not be held to data quality standards for participants - especially for social security numbers which can be linked to people's documentation status.
 - **Response:** It is correct that identification is not required under the low-barrier policy. While, SSP programs must enter the universal data elements in HMIS, "client doesn't know" or "client refused" can be entered. Furthermore, grantees and/or subgrantees should ensure the data that is being collected at intake or in the participant file matches what is entered in HMIS.

8. Email Received

Sent: Tuesday, September 9, 2025 4:38 PM

To: HSD Homeless Services * HCS <hsd.homelesservices@hcs.oregon.gov>

Subject: SSP Comments

Hi folks,

Attached are my SSP comments. Please don't hesitate to reach out with any questions, happy to chat.

Thank you all for all your work!

Best,
Alexandra Ring, Lobbyist
League of Oregon Cities

Thank you for the opportunity to provide comments on the initial draft rules for the Statewide Shelter Program (SSP).—League of Oregon cities and our members are excited to see this process move forward and look forward to collaborating to create a successful program.

Regarding initial feedback, our members, and this was a broader sentiment among The RAC members at large, would like to see great specificity in rule surrounding three key areas: lack of clarity in the grievance system, the need for a published finalized funding formula, and using SSP funds to “replace” other funds.

The first is the grievance system between regional coordinators and shelter operators. More details are needed on what materials will be needed, what criteria OHCS will be using, and what the process of the appeal will be. An additional level of detail will be need in rule to make this implementable and make the grievance system fair, transparent, and understandable.

Second, we echo the request made during the meeting that the finalized funding formula be shared to help with transparency, reduce administrative burden, and ensure that applications focus on the State's priorities.

Third, we would add an additional strong word of caution regarding clauses in the rules about local funding and not being able to replace other funds with SSP funds. This is not in line with workgroup discussions and steps far outside the budget note provided and legislative intent. Cities are facing, in some cases, extreme budget shortfalls, both due to the lack of expected federal funds and general economic conditions. Our local governments are faced with tough decisions and the level of funding for city programs across the board is likely to reduce, cities are likely to try to maintain homeless services and shelter funding at the same level but that may just not be possible. Cities do not expect that the state or OHCS will fill those budget shortfalls automatically but it is another thing entirely to say it cannot happen even if it is the only thing that will keep a shelter open. This provision is short-sighted and out of alignment with legislative intent.

We appreciate agency staff, rulemaking advisory committee members, and subject matter experts from across Oregon dedicating time to creating the best rules possible. This is a vital issue facing our state and these initial draft rules are headed in the right direction, they simply need more detail and a bit of tweaking.

Response:

- OHCS will update the grievance system to reflect the scope is limited to disputes related to the interpretation and/or implementation of the program manual, which may include the regional plan. The purpose of the grievance system is for OHCS to review, track, and mediate disputes between program provider subgrantees and regional coordinator subgrantees. OHCS will respond to grievances; however, the grievance system may not issue orders or otherwise adjudicate disputes.
- OHCS will continue to have engagement around the funding formula. We will have a Request for Applications to identify Regional Coordinators. Once the Regional Coordinators are selected, we will be able to determine the regions and develop the funding formula.
- OHCS understands cities and communities are facing challenges with budget shortfalls. One of the goals of the SSP is to create a sustainable statewide shelter system. OHCS is also legislatively mandated to develop budget note recommendations that incorporates shared funding between state and non-state funding sources as part of that goal. Leveraging and braiding other funds is a critical component to creating a sustainable shelter system. The Regional Coordinator model gives regions the flexibility of how they

braid funding. SSP funds may be used to supplement existing funds, but they cannot be used to replace existing funds available for the same purpose.

RAC Participants' Feedback Provided After the RAC Deadline

The following questions and feedback were received after the deadline for RAC members to submit written feedback. Due to timelines for internal reviews, the late feedback might not be incorporated in the draft rules as noticed. However, many of the questions and comments raised are already addressed in previously submitted feedback.

1. Email Received

Sent: Friday, September 12, 2025 11:23 AM

To: HSD Homeless Services * HCS

[<HSD.HomelessServices@HCS.oregon.gov>](mailto:HSD.HomelessServices@HCS.oregon.gov)

Subject: RE: Statewide Shelter Program - Rules Advisory Committee Follow Up

Dear SSP Team, RAC Committee, and Workgroup Members,

I apologize for being late in submitting feedback. Things have been moving quickly on our end with the North Bend Family Housing project underway, the SPARC Network being stood up.

I still wanted to make sure you had the benefit of our perspective from the South Coast (Coos and Curry). Attached is the feedback from the lens of our Service Providers and Regional Connections (SPARC) Network and Model. This feedback reflects our efforts to build a regional continuum of care that spans outreach, shelter, supportive housing, and pathways into permanent housing and homeownership. We believe this aligns well with the intent of HB 3644 and offers a rural perspective that may be helpful as the rules and program design continue to evolve.

Thank you for all the work your team is doing to move this program forward. Please let me know if there are other opportunities to stay engaged in the process.

Respectfully,

Matt Vorderstrasse, M.A., PHM

Executive Director

(He/Him/His)

North Bend City/Coos-Curry Housing Authorities

Re: RAC Feedback on HB 3644 and Statewide Shelter Program Rules

Dear SSP Team, RAC Members, and Sustainable Shelter Workgroup Members,

On the South Coast, we've been working to build a coordinated shelter and housing system through the SPARC Network (Service Providers and Regional Connections). Our focus has been creating a continuum — outreach, shelter, transitional housing, supportive housing, and pathways to permanent housing. In reviewing the draft rules and manual for the Statewide Shelter Program (SSP), I see strong alignment with this vision.

I also want to share some rural realities and ask clarifying questions to ensure the program rules fully support models like SPARC that are already building capacity in under-resourced regions.

Feedback, Questions, and Recommendations

1. Scale and Rural Capacity

A 24/7 shelter standard makes sense in urban areas but **may** only be feasible in rural regions if communities pool resources for regional sites.

Question: Will OHCS allow flexible scaling for rural coordinators to meet the intent of 24/7 coverage by leveraging regional shelter models, rather than requiring every community to sustain a full facility?

2. Data & Distribution Formula

I appreciate the inclusion of multiple data sources beyond PIT. On the South Coast, PIT counts in 2022–23 were artificially low due to weak local organizing, which affected EO investments.

Question: Can OHCS provide community interventions or technical assistance to help regions strengthen PIT counts and data collection, so resources are distributed fairly and consistently?

3. Braiding Resources for Sustainability

The manual rightly covers OHCS funds, but in practice shelters rely on braided support from CCOs, county funds, philanthropy, HUD, and tribal partners.

Recommendation: Develop a Resource Braiding Toolkit (potentially co-created with providers) to guide regions on aligning OHCS rules with other funder requirements, building sustainable partnerships, and leveraging non-state resources.

4. Workforce & Staffing

Rural areas struggle with limited staff pools. SPARC has emphasized peer staff, trauma-informed training, and CCO partnerships to sustain workforce.

Question: Will OHCS consider setting aside capacity-building funds (training stipends, technical assistance, peer certification programs) so rural regions can stabilize and expand shelter staffing?

5. Shelter Standards & STEPS

The SSP manual sets ambitious service standards (meals, case management, medical access, etc.). These are important but risk excluding smaller or nontraditional models that are often the only entry point in rural regions.

Question: Will OHCS consider phased implementation or tiered standards, especially for STEPS models (safe parking, huts, tiny villages), so we don't lose critical entry-level beds while working toward higher standards?

6. Equity & Exits

The equity lens in the draft rules is critical. On the South Coast, SPARC is integrating equity by embedding culturally responsive partners and tracking outcomes by population group.

Question: Can OHCS provide technical assistance and data coaching so regions don't just report outcomes but also build capacity to identify and correct disparities in exits?

7. Regional Coordinating Body & SPARC

On the South Coast, we are actively building a regional model that aligns with the spirit of HB 3644. SPARC is repurposing the Coos County Office of Homeless Response and incorporating the Curry County Homeless Task Force into a unified regional coordinating body. The nonprofit Southern Oregon Coast Regional Housing (SOCRH) will support coordination across providers. Together, this model creates a regional continuum of care — from outreach and shelter, through transitional and supportive housing, to affordable rental and ultimately homeownership opportunities through a Community Land Trust.

Question: Will the SSP rules be flexible enough to allow regional setups like SPARC to serve as the coordinating body, aligning the entire housing continuum — from shelter through to homeownership — while still meeting OHCS requirements for shelter program coordination?

8. Housing Placement & PHA Partnerships

HB 3644 encourages housing placement, but it stops short of requiring that shelter beds be **reasonably connected to permanent housing pathways**. Without stronger linkages, we risk creating **bottlenecks** if local PHAs or housing providers do not partner.

On the South Coast, SPARC is working to change that by explicitly mapping the continuum from shelter to housing, with PHAs and affordable housing providers at the table.

Question: Will OHCS take a stronger role in encouraging or convening **PHA and housing provider partnerships** with local shelter programs, to ensure that shelter capacity translates into permanent housing outcomes rather than becoming a bottleneck?

Recommendation: OHCS's **shelter team and shelter investments should be linked to the ORCA system**, so OHCS can also ensure that state housing investments are tied into this shelter system and aligned with community needs. If OHCS moves without silos, it will teach us to move without them as well.

9. Training & Workforce Development Resources

This is a high-burnout industry, and shelters often operate with limited staffing capacity. While the draft manual requires certain trainings (trauma-informed care, harm reduction, DV, etc.), access to consistent, high-quality training is uneven across the state.

Recommendation: OHCS should collect and post updated training resources for shelter staff and programs, including peer support models, operational best practices, and workforce development tools. Centralizing these resources would build organizational capacity, improve staff retention, and better prepare shelters for the realities of day-to-day operations.

Closing

The South Coast is already moving toward the statewide vision laid out in HB 3644, but we need rules that recognize rural scale, braided funding, workforce limitations, and the role of models like SPARC. I appreciate the direction of the program and I believe it will set Oregon up for a stronger, more equitable shelter system.

2. Email Received

Sent: Wednesday, September 17, 2025 11:30 AM

To: HSD Homeless Services * HCS

[<HSD.HomelessServices@HCS.oregon.gov>](mailto:HSD.HomelessServices@HCS.oregon.gov)

Subject: RE: Statewide Shelter Program - Rules Advisory Committee Follow Up

Good Morning,

My apologies for this late reply. However, I wanted to make sure rural Eastern Oregon was heard. Jimmy Jones' letter, and comments, resonate with our service providers. Housing justice, human dignity and civil rights should be the cornerstone of our efforts. Shelters in Eastern Oregon, using his description, are damp shelters that do not allow contraband (including marijuana) and have no sobriety or clean living policies. Today's reality is shelters operate as a business circumventing church groups and/or kind-hearted volunteers. Businesses have expenses - insurance costs (and availability) - is concerning.

Popular opinion, on the east side of the Cascades, is local control driven primarily by the community.

Best Regards, Cindy

Celinda A. Timmons

Umatilla County Commissioner

Umatilla County

3. Email Received

Sent: Thursday, September 18, 2025 1:01 PM

To: HSD Homeless Services * HCS

[<HSD.HomelessServices@HCS.oregon.gov>](mailto:HSD.HomelessServices@HCS.oregon.gov)

Subject: RE: Statewide Shelter Program - Rules Advisory Committee Follow Up

Good afternoon,

The Governing Board of the Balance of State CoC met today, and several questions and concerns were raised regarding the SSP.

1. Capacity building is set at 15% and includes training, staffing and TA. Is there indirect / admin cost allowed outside of the Capacity Building 15%?
2. There is a long list of required trainings. Is there a time limit for when the trainings need to be completed? Do staff need to have them all completed prior to working at the shelter? Is OHCS going to help coordinate finding / providing the trainings?
3. If a shelter has not been year-round before, due to funding constraints, can this funding be used to keep the shelter open outside of their partial year funding?
4. Can the funding be used to pay for increased insurance costs for allowing pets?
5. Can shelters limit the number of animals allowed by a single household?
6. Comment: additional supports and structure are needed to facilitate exits out of the shelter system and into permanent housing.

Thank you,

Brooke Matthews