

Statewide Shelter Program Rules Advisory Committee Feedback – Debrief Summary

Statewide Shelter Program (SSP) contact:

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Rules Advisory Committee (RAC) facilitator contact:

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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