Rulemaking Engagement Record

Statewide Shelter Program

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Oregon Housing and Community Services

December 3, 2025

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Date: October 15, 2025

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PERMANENT RULE ORDER

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Engagement Summaries

RULES ADVISORY COMMITTEE

A Rules Advisory Committee (RAC) met on Sept. 2, 2025, from 1:00 to 3:00 p.m. PT via Teams webinar.

Of the 22 confirmed RAC participants, 15 attended the meeting (names in **bold text** below) and provided feedback on the draft rules and manual and proposed impact statements drafted by OHCS:

- Earl Bowers
- **Kate Budd, Lane County Human Services Division**
- Chris Byrd
- **Ashley Carson, Center for Hope & Safety**
- Marci Cartagena, Our Just Future
- **Melanie Doshier, ACCESS**
- **Mickie Derting, Central Oregon Intergovernmental Council**
- **Timothy Ellsworth, Washington County**
- **Katie Gentry, Washington County**
- **Elissa Gertler, Clatsop County**
- Jimmy Jones, Mid-Willamette Valley Community Action Agency
- **Rep. Pam Marsh, State Representative**
- **Brooke Matthews, Oregon Continuum of Care**
- **Evelyn McCoy-Harris, Seed of Faith Ministries**
- **Thomas McGregor, Peace at Home Advocacy Center**
- **Brook O'Keefe, City of Bend**
- **Alexandra Ring, League of Oregon Cities**
- **Megan Smith, Sheltering Silverton**
- Celinda Timmons, Umatilla County
- Matthew Vorderstrasse, North Bend City/Coos-Curry Housing Authorities
- Jody Warnock, Community in Action
- **Regan Watjus, City of Eugene**

All RAC participants were provided with copies of the proposed impact statements, draft rules and program guidance, engagement summary, and House Bill 3644 prior to the Sept. 2 meeting. After the RAC meeting, the slide deck (which included a summary of RAC participants' feedback captured during the meeting) was emailed to the RAC participants for review and additional feedback. All RAC materials provided, including the RAC feedback summary and OHCS responses thereto, can be found here.

RULES PUBLIC HEARING

The rulemaking hearing on the proposed rules was convened on October 15, 2025, at 9:00 a.m. PT. People were asked to provide their name and organization, if any, and if they wished to comment on the proposed rules. They were informed of the procedures for taking comments. They were also told that the hearing was being recorded.

List of Attendees:

Thirty-seven people attended, seven of whom were OHCS staff:

Abby Ahern	Casey Houlihan,	Anna Pendas
Janet Allanach	OHCS	Tom Powers
Cassandra Bay	Terri Hsieh	Amanda Rapinchuk
Hunter Belgard	Heather Inyama	Matthew Rogers
Kendra M. Blaylock	Adam Jenkins	Nicole Servin, OHCS
Misty Bolger	Sarah Kellems	Monica Steele
Lizzie Cisneros	Howard Kopp	Krystal Styles, OHCS
Carol Crum	Claudia Limon	Robbin Swales
Jaci Davis, OHCS	John Lodise	Zac R. Thompson
Sam Engel	Jovany Lopez, OHCS	Ollie Todd
Amber Frye, OHCS	Nicole Merritt	Brian (no last name
Sheila M. Giorgetti	Evyn Mitchell	given)
Anabel Hernandez-	Leslie Naramore	
Mejia, OHCS	Victoria Palacios	

No one submitted written comments at the hearing.

Summary of Oral Comments and Responses:

The following people testified at the hearing (in order of speaking), and their testimony is summarized.

Monica Steele, Clatsop County: We appreciate the state's commitment to building a sustainable statewide shelter system; however, we have several concerns with the proposed rules as drafted, particularly regarding how they will impact rural communities. Increased administrative demands (e.g., reporting and coordination requirements) and reduced funding suggest a disconnect

between state expectations and the operational realities of local implementation. Concerns about the proposed funding formula that favors larger urban areas and puts rural regions at a disadvantage. The rules should preserve and strengthen the role of Regional Coordinators as the central point of contact for program administration. The grievance process lacks clarity. We urge OHCS to ensure that the rules recognize the distinct realities of rural regions and reinforce a framework that supports local flexibility, equitable funding, and effective regional coordination.

Anna Pendas: Echo what Monica shared. Also, it feels in conflict that we are talking about evaluating shelter programs based on their ability to move people into housing when things like housing costs (housing deposit, rent and utility arrears, rental and utility deposits) are unallowable expenses.

John Lodise, Shepherd's House Redmond Center: When trying to obtain funding from multiple diverse sources, each with their own reporting and metrics requirements and other administrative concerns, it can dilute the impact of the work and the goal of getting unsheltered people into shelter and either directly out of homelessness or at least further along the continuum. Also, in some cases, requiring us to collect information from low-barrier guests can be impossible or at odds with what low-barrier is supposed to be. Ultimately, there needs to be ongoing, regular, and easy communication between the service providers and the folks who are administering this program.

Nicole Merritt, Shepherd's House Ministries: There's a large concern to have a metric of the Statewide Shelter Program be "increased transitions into housing" when the availability of affordable housing (low-income to 30 percent AMI) in our area is outside the service provider's control.

Sam Engel, Rogue Retreat: We recognize that one of Governor Kotek's goals is to roughly double the rate of housing production from 18,000 to 36,000, but we've also read that there are only about 7,000 new housing starts in Oregon this year. Looking at where people would accept shelter and transitional housing is incredibly important, ensuring that's part of the reality we're evaluating when assessing shelter success. We are increasingly looking at stability, especially for our low barrier guests, as a measure of success, to have folks that are not exiting and re-entering shelter regularly and who are instead able to, through case management, achieve a level of stability that puts people into a better position to enter treatment, as appropriate, or achieve placement in more stable, case-managed shelter or transitional housing.

No one submitted written comments at the hearing without testimony.

The hearing was adjourned at 9:21 a.m. PT. The public comment period closed at 5 p.m. PT on Oct. 29, 2025.

Consideration and Integration of Public Comments:

OHCS considered the public comments received. Each of the written comments and attachments submitted via email is attached to this report, and the comments are generally summarized below.

While OHCS is appreciative of all feedback received, staff have focused on responding to comments that were not previously addressed in the RAC feedback summary and either:

Contradict or question the agency's fiscal, economic, small business, or racial equity impact statements as noticed, **or**

Resulted in changes to the draft rules or program guidance.

The following individuals and organizations submitted written comments during the public comment period:

Josie Anders-Mize, Redmond Oasis Village Project, received Oct. 29, 2025: Request additional clarity and detail around the definition of "low barrier," whether the focus is on removing barriers to access shelter, or how a shelter works with participants after they come into shelter (or both). Loosely defining "participation" while mandating it as "not required for client eligibility to stay in shelter" could unintentionally put shelter operators in the position of renegotiating their boundaries to meet funding compliance. Define "case management" so providers can align the specific components of what they offer under that umbrella, better ensuring contractual compliance and still providing impactful, high-quality services.

Cassie Bay, o/b/o Misty Bolger, Mid-Willamette Valley Homeless Alliance, received Oct. 15, 2025: Concerns regarding coordination of Regional Coordinators and existing Continuums of Care (selection process, boundaries, duties, alignment with HUD-related reporting cycles and obligations). Suggest removing or raising the 15 percent cap on administrative and indirect costs. Encouraged stronger coordinated entry requirements for all Statewide Shelter Program-funded shelters and Regional Coordinator ownership of data

submitted to OHCS. Emphasized equity considerations for people with lived experience of homelessness and outreach to culturally specific and faith-based organizations. Requests a rule-based appeals process with clear timeliness to ensure fairness and consistency.

- OHCS Response: The 15 percent administrative cost rate is based on the federal *de minimis* rate. We are unable to increase the rate at this time, but we will continue to monitor these rates.

Kate Budd, Lane County Human Services Division, received Oct. 29, 2025: The requirement to document efforts to obtain consumable supplies for street outreach outside of using state funds is unrealistic and burdensome. Include pet and other legal fees in Oregon as allowable costs for housing-focused activities. The requirement that at least 50 percent of the total Statewide Shelter Program award be used for shelter operations reduces the flexibility of the funding, limiting regions and individual shelters' ability to meet their unique needs. For example, a shelter might need housing-focused activity funding rather than operations funding due to a diverse funding mix. Can a new email address be set up to which Regional Coordinators can submit budget change requests, removing potentially misleading mention of MGA?

Shawn Collins, Unity Shelter, received Oct. 29, 2025: Increased level of documentation and ongoing compliance monitoring, while reasonable, will increase staff workload and require changes to existing processes, which will also take time. Provision of written notices for causes of shelter exit or other service restrictions makes sense in the abstract but can be challenging during a crisis that threatens the safety of other shelter guests, staff, or volunteers. Appeals processes must allow for some timeframe, as often people who are exited may not return for days, especially if there was some conflict with another shelter guest that initiated the exit, so follow-up may be difficult. The allowable costs outlined in the manual and related operational requirements are very helpful to see. Allowable admin costs of 15 percent might not be enough given the large authority and responsibilities of Regional Coordinators, depending on the size of their region and future allocations. Concerns about the selection of a Regional Coordinator to oversee a region they have not worked in previously, and the potential loss of local engagement and accountability without existing experience or relationships with providers and subgrantees in the area, despite possessing the organizational qualifications to operate a large, diverse region.

What checks exist to prevent a Regional Coordinator from redirecting resources to more subgrantees in its "original" regional footprint?

- OHCS Response: The 15 percent administrative cost rate is based on the federal *de minimis* rate. We are unable to increase the rate at this time, but we will continue to monitor these rates.

Terri Hsieh, Multnomah County Homeless Services Department, received Oct. 29, 2025: Allow regions to align client assistance guidance execution with existing funding, minimizing barriers for clients who access multiple types of shelter (with different funding sources) within a region. Adjust eligible expense categories to include more flexible spending and align with current local initiatives, reducing subgrantees' reporting burden. Request flexibility in budget change requests when moving funds between lines. Clarify which funding categories can support portability and out-of-region/out-of-state costs, mindful of existing restrictions. Define "recovery-focused" and add detail to the definition of "low barrier."

- OHCS Response: We will adjust eligible costs for over-the-counter medicine for street outreach. We will also add the definition of "recovery-based."

John Lodise, Shepherd's House Redmond Center, received Oct. 27, 2025: Reiterated oral comments offered at public hearing. Appreciates a holistic perspective to offering services. Encourage the option to apply flexible, *ad hoc* case management services, rather than requiring formalities when they do not practically advance a client's situation. Resolution of grievances in a low-barrier shelter is less susceptible to objective criteria than, say, whether a housing applicant meets rental criteria, and that reality needs to be acknowledged in how the process is applied.

Michael Kinnison, o/b/o City of Eugene and local shelter providers, received Oct. 29, 2025: Suggest revisions to language re: use of admin funds, increasing admin cap from 15 percent to 20 percent to allow Regional Coordinators to cover their admin costs as well as cover subgrantees' actual costs. The manual is confusing and inconsistent in the way it couples STEPS with low-barrier and recovery-based definitions. Request more clarity around training requirements, including sources, training types, and application of fair housing principles; and low-barrier expectations, particularly around case management and pets. Include additional allowable costs for STEPS, such as data entry, pest management, participants' transportation costs, translation services, food, and

furnishings, as well as adding shelter units, unit replacement, and permit fees as allowable costs for Shelter and STEPS Operations. Support the option of a grievance process, and request that OHCS provide a recommended resolution in its written report summary responding to a request for support.

- OHCS Response: The 15 percent administrative cost rate is based on the federal *de minimis* rate. We are unable to increase the rate at this time, but we will continue to monitor these rates. Additionally, OHCS will approve all funding methodologies via the regional plans, including the subgrantee admin allocations. We will make changes to the eligible cost categories to be inclusive of the recommendations for STEPS, with the exception of unit replacement/upgrade. OHCS approval is required for any urgent facility rehabilitation or renovation that is beyond maintenance/repair but is necessary to maintain operations. We will add "pets" to the latest manual version on the conditions of low-barrier sites.

Nicole Merritt and Curt Floski, Shepherd's House Ministries, received Oct. 29, 2025: Measuring shelter performance primarily by housing outcomes risks misrepresenting the effectiveness of shelters that are stabilizing individuals who might otherwise face life-threatening conditions in unsheltered environments. Recommend including additional metrics that value stabilization, engagement, and progress toward housing readiness, to more accurately reflect the work of rural shelters operating amid limited housing stock, but still providing critical, life-saving stabilization and connection to services. Mandating uniform operational standards such as facility types, staffing ratios, or service menus without allowing for local flexibility could force small shelters to scale back or close due to costs or logistical infeasibility. The proposed reporting and data compliance expectations, while understandable for transparency, will likely create significant administrative burden for small rural providers that, without additional funding for administrative capacity, could divert resources from direct service delivery to paperwork. Incorporate rural weighting factors in the funding formula to account for geography, weather severity, and lack of nearby services, and require Regional Coordinators to demonstrate equitable inclusion of small and rural providers in planning and funding allocation. Rules should explicitly allow shelters to maintain mission-aligned flexibility, especially around low-barrier operations, guest engagement, and the use of informal or *ad hoc* case management approaches, as overly prescriptive regulations could unintentionally shift the mission and operational flexibility that make community-based shelters effective.

- OHCS Response: The draft rules for the funding formula include factors that OHCS may use in determining allocations. It includes factors mentioned here, such as cost per bed and housing availability, and other factors that may vary regionally (such as poverty data and McKinney-Vento). We heard feedback from other rural providers that PIT is harder in rural areas and does not accurately reflect the need. This is why there are several other potential factors. If used, the PIT would be one among several factors in the formula.

Jessica Pratt, o/b/o Association of Oregon Counties, received Oct. 29, 2025: Data collection and reporting as eligible uses of funds. Level set expectations on the timeline for standing up the statewide system. Provide sample policies and recorded trainings. Clarify obligations of Regional Coordinators and the grievance and appeals process. Requirements for on-site meals and showers will eliminate local capacity in under-resourced communities. Ensure state reporting requirements align with federal confidentiality requirements. Limited availability of other providers may preclude local referrals. Change "limit" to "prohibit" re: drug/alcohol use in common or shared areas. Heavy restrictions on requests for advance payments will impede service, given the history of administrative delays. The 15 percent admin cost cap is likely inadequate, given the additional admin workload on Regional Coordinators; please continually monitor to ensure the cap reflects the actual cost of these functions.

- OHCS Response: Data collection and reporting are eligible uses of funds. The 15 percent administrative cost rate is based on the federal *de minimis* rate. We are unable to increase the rate at this time, but we will continue to monitor these rates. Regarding advance payments, the manual specifies that the only restriction on requesting an advance is that a grantee must document and ensure they have already expended any prior advances. The request does not require additional documentation outside of what the grantee should already be tracking. Based on RAC feedback, the updated manual was changed to "limit the use of drug and alcohol anywhere on the premises," which is intended to be inclusive of prohibiting drug/alcohol use in common areas.

Amanda Rapinchuk, o/b/o Clatsop County, received Oct. 21, 2025: Concerns regarding increased administrative burden, urban-focused funding formula, and the need for timely communication between OHCS and Regional Coordinators. There is ambiguity in the roles of OHCS, Regional Coordinators, and providers,

and a lack of clarity around the scope of the grievance process. Small and rural counties and organizations have unique needs. Propose revising the "no net loss of shelter beds" requirement for 2025-27 to align with current funding levels, as this requirement disproportionately impacts rural areas with limited fiscal capacity and undermines equitable statewide implementation. Requiring full integration across underfunded or uncertain programs (like Medicaid or behavioral health resources) shifts the burden of federal or state funding gaps onto local providers. The proposed funding formula relies on metrics (e.g., existing shelter beds, housing availability, prior program performance, and Point-in-Time counts), which put rural counties at a disadvantage even when the need for services is high.

- OHCS Response: We appreciate this feedback. While we likely will not incorporate the specific suggestion regarding communication expectations in rule or the manual, we will explore what establishing more documented communication expectations are for OHCS with the Regional Coordinators. The draft rules for the funding formula include factors that OHCS may use in determining allocations. It includes factors mentioned here, such as cost per bed and housing availability, and other factors that may vary regionally (such as poverty data and McKinney-Vento). We heard feedback from other rural providers that PIT is harder in rural areas and does not accurately reflect the need. This is why there are several other potential factors. If used, the PIT would be one among several factors in the formula. Regarding rehousing, Medicaid, and behavioral health alignment, the intention of including this in the regional plan is not that Regional Coordinators will be required to have full integration with rehousing, behavioral health, and Medicaid systems. Rather, we are looking at how Regional Coordinators will engage these partners in developing their regional plan and strategize around supporting shelter guests with Medicaid enrollment and continued coverage, creating or strengthening opportunities for access to behavioral health at emergency shelters, strengthening linkages to community health and behavioral health resources, developing strategies to support shelter guests with high medical or behavioral health acuity, supporting training and technical assistance for shelters to leverage Medicaid funding, and providing capacity building and training opportunities for shelter staff to support shelter guests with behavioral health and health issues.

Andrew Scott, J Bar J Youth Services, received Oct. 29, 2025: Design rules to preserve space for localized program adjustments and community-driven CQI (Continuous Quality Improvement), as this flexibility has been essential to developing culturally responsive, trauma-informed, and developmentally appropriate shelter services for youth. Clearly define the scope of authority for Regional Coordinators versus local providers, accountability mechanisms to ensure alignment with locally identified needs and data, and identify opportunities for providers and youth voices to participate in ongoing regional planning and CQI cycles. Require regions to track and report youth-specific outcomes and maintain dedicated youth allocations rather than absorbing them into broader adult or family shelter priorities. Establish standardized data measures that capture both quantitative and qualitative outcomes to allow continuous CQI without overburdening providers.

Carly Walker, Lane County, received Oct. 14, 2025, and Oct. 16, 2025: Questioned whether HMIS project types could be set up for Basic Overnight shelters to accommodate both ES-Night-by-Night and ES-Entry Exit. Given this biennium's allocation, Lane County anticipates that not all of its shelters will have the funding to meet all the proposed housing-focused shelter components.

- OHCS Response: We will remove the HMIS project types for basic overnight shelter and housing-focused shelter. We will explore alternate solutions to evaluate these shelters.

OHCS General Response to Public Comments:

- **Concerns about administrative burden**: We appreciate the comments about administrative burden. We have taken steps to decrease administrative burden by reducing data collection requirements for all project types under the Statewide Shelter Program to align with shelter work group recommendations, reducing the HIC report submission to twice a year rather than monthly, and requiring that Regional Coordinators submit a subgrantee report once and update it as needed rather than submitting a complete report quarterly. We also encourage Regional Coordinators to build upon existing work in their regional plans. We will continue to monitor administrative reporting requirements.
- **Role of Regional Coordinator and grievance process:** Based on feedback from the RAC, we updated the grievance system to reflect that the scope

is limited to disputes related to the 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. Our intention is to coordinate and communicate directly with Regional Coordinators and to refer subgrantees back to the Regional Coordinators. In cases of a dispute that falls within the grievance process, we will direct subgrantees to that process; however, we do not prohibit subgrantees from reaching out to us directly.

- **Training and sample policies:** We appreciate the feedback on training and the request for sample policies. We will take these suggestions into consideration.
- **Outcomes:** We appreciate the comments about concerns of using outcomes related to transitions to stable housing. We recognize that the lack of availability of affordable housing is a widespread issue. Regional Coordinators will have the opportunity to propose their outcome goals in the regional plan. The outcomes for the Statewide Shelter Program (increase permanent housing placements and reduce returns to unsheltered homelessness) are based on legislative mandate to reduce unsheltered homelessness and transition people experiencing homelessness into housing stability.
- **Concerns about meeting standards:** We recognize that some Regional Coordinators may need time to meet the requirements of the Statewide Shelter Program. We built the schedule so that Regional Coordinators are selected in January 2026, allowing for a ramp-up period to be operational by July 2026. We also encourage Regional Coordinators to reach out to the contract administrator if there are concerns about not meeting the requirements.

Rules Engagement Materials and Meeting Transcript

DIVISION 275 - Statewide Shelter Program (SSP)

Rules Advisory Committee Meeting Agenda
September 2, 2025, at 1:00 p.m.

Location: Teams Webinar – Registration is Required

Meeting Objectives

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

Agenda

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

Overview of OHCS and the Rulemaking Process

Background on SSP Development:
- 2024 Shelter Workgroup
- House Bill 3644 (2025)
- June 2025 engagements

Opportunity to Review & Improve the Draft Rules and Program Manual
- Do you see opportunities to adjust the rules to better serve your communities?
- Are the elements of the program manual that don't align with the rules?

Impact Assessments
- State RAC procedures require assessment of impacts in the following areas:
  - fiscal impact on state agencies, local government, or the public

> o potential of significant impact on small businesses
> o reporting and other administrative activities required for compliance
> o impact on racial equity statewide

Next Steps & Closing
- Review comments and feedback collected during the meeting
- Announce future engagement opportunities and review timeline

Process Agreements from Rules Advisory Committee

This is intended to be a creative, brave space where we can think about how best to serve Oregonians with the adoption of these rules to remove barriers to access shelter resources. To accomplish this, participants are asked to respect the following process agreements:

- **Seek common ground & understand divergence:** Practice "*Yes, And*" to affirm shared values while building on and expanding ideas. Be clear, yet constructive where you have differing experiences and opinions.

- **Share airtime:** Everyone deserves to be heard, and everyone has a piece of the truth. Challenge yourself to engage in ways that honor the voices and thinking space of others. Practice "W.A.I.T": ask yourself, *Why am I talking?* Or *Why aren't I talking?*

- **Active virtual participation:** To respect the topic, each other, and to make the most of our time together, please practice active virtual participation to the maximum extent able. This includes making sure your Teams name is accurate, keeping your video on, using chat and Q&A functions, raising your hand to engage in open dialogue, responding to polls, engaging in virtual activities, and minimizing multi-tasking.

- **Take care of yourself:** We strive to facilitate high impact RACs where we use our limited time to the fullest, please do what you need to take care of yourself so you can participate fully and do your best thinking.

SLIDES

The slides presented at the Sept. 2, 2025, RAC meeting are included in the RAC materials posted on the OHCS administrative rules website and are archived [here](#).

OREGON HOUSING *and*
COMMUNITY SERVICES

All materials provided to the RAC and the RAC feedback – debrief summary were posted on the OHCS administrative rules website and are archived here.

MEETING TRANSCRIPTS

TRANSCRIPT OF RAC MEETING

September 2, 2025, 12:58 PM (PT)

BAUTISTA-SYLTEN Danielle * HCS 2:07

Good afternoon, everyone.

STYLES Krystal * HCS 2:07

Good afternoon, everyone.

BAUTISTA-SYLTEN Danielle * HCS 2:10

We're just getting started.
Waiting a few more minutes before we get started.

BENNETT Rachel * HCS 3:46

Good afternoon, everyone.
Thank you for coming to the Statewide Shelter Program's Rules Advisory Committee with OHCS.
My name is Rachel Bennett, my pronouns are she/her, and I am the Divisional Rules Coordinator for the Housing Stabilization Division, which is where the Statewide Shelter Program will live.
We're giving it just a minute or two for the rest of our RAC participants to trickle in.
If you would like to put your introductions in the chat, please feel free to do so, including your name, the organization that you represent, maybe if you have an awareness of how you touch on or are involved with the Statewide Shelter Program—maybe you're in the shelter work group, maybe you're a shelter service provider or someone with lived experience—and we do have an icebreaker for folks, and that is: what is a rule that you live by? Go ahead and drop that in the chat while we give a few more minutes for folks to join.

If we can, Krystal, if we can move ahead to the next slide, that would be great. So, like I said, my name is Rachel Bennett and I'm with the Housing Stabilization division here at OHCS; my connection to the Statewide Shelter Program is that I am the rules coordinator and have been helping our project team move through the administrative rules process; and a rule that I live by, and I feel like it's germane to this space, is "don't confuse a lack of empathy for a lack of education." In other words, we choose what we care about. You can explain stuff to someone until you're blue in the face, but you can't make them care about it, and that has saved me a fair amount of aggravation over the years, remembering that.

I'd like to hand it off to our other RAC presenters today, and let's go ahead and start with Anabel.

HERNANDEZ-MEJIA Anabel * HCS   5:59

Hi, everyone.

Anabel Hernandez Mejia, she/they pronouns; I'm with Oregon Housing and Community Services; and my connection is that I'm a community engagement specialist mostly supporting the Housing Stabilization Division and this work with rules, as well. And one rule I live by is treating others like I'd like to be treated myself.

And I'll go ahead and pass it on to Danielle.

BAUTISTA-SYLTEN Danielle * HCS   6:28

Hi, everyone.

My name is Danielle Bautista Sylten, she/her/hers pronouns; I am with OHCS as an unhoused policy and planning analyst, and I am the policy lead for this project; and one rule I live by and with my kids is, "when in doubt, just bounce." So when we're stressed out, we just dance it out.

Great. And I will pass it over to my colleague, Colt.

SRAY Colt * HCS   6:54

Thanks, Danielle.

Good afternoon, everyone.

My name is Colt Stray; I use he/him/his pronouns; and I work as the homeless services program coordinator within our Housing Stabilization Division at OHCS

and been closely involved in the development of the Statewide Shelter Program and will ultimately serve as the grant administrator from OHCS. I think that one rule I live by is that everyone you will ever meet knows something that you don't, and I like that rule because I try to live and work with curiosity and lead with that. And it kind of comes with treating people with respect, valuing their perspective and that their life experience has been different than mine. So that's been big for my growth over the years.

But really excited to be here and appreciate you all joining with us today as well.

Rachel, I think I'm turning it back to you or maybe Jaci.

BENNETT Rachel * HCS   7:50
Nope, right back to me.

SRAY Colt * HCS   7:51
OK, great.

BENNETT Rachel * HCS   7:51
Thanks, Colt. And let's go to the next slide please.

So, at the top of the meeting, I want to go over some housekeeping-type stuff. Number one: we do want to seek common ground and understand divergence. Practice "yes, and" to build on ideas. Be clear and productive when you share different experiences and opinions. We definitely want to make space for the many different perspectives and lenses that are present today. We also have a big group.

This is a big committee, and we want to make sure everybody has the space to share.

Practice WAIT. In other words, "why am I talking?" or "why aren't I talking?" Active virtual participation is strongly encouraged. If you want to put questions in the chat, if you want to use the Q&A feature—please do so. You don't always have to come off mic or on camera. However you feel most comfortable engaging, please go that route. If you do wish to speak, use the raise hand feature in Teams.

If for some reason that is not working, we are going to be watching for folks that are raising their hand in the window. That's also fine.

We're going to be launching a few polls throughout the presentation. Please do engage with them and, to the extent possible—and I know it is difficult in a virtual space—please minimize multitasking to the to the extent possible.

Above all, take care of yourself. If you need to step away—we know this is a long meeting, going to be about two hours, and I think it's going to run the whole time—you need to step away, take a break, if, for whatever reason, you need to leave the meeting altogether, that is absolutely fine. We will be sending follow-up communications. We will try to get your feedback through other routes. Do not worry about it.

Next slide please.

So, a couple of additional housekeeping-type items.

Please keep yourself muted when not talking. (This is mostly for the RAC participants. Members of the public who are observing, we need you on mute and off camera altogether. Your role is strictly that of an observer.) If you are engaged in active discussion, it's fine to stay on mic the whole time.

Do use the chat. We will try to answer questions as they come up in the chat, especially if they're quick ones. If we don't get your question in the meeting space, I assure you, we will respond to your question in a follow-up communication. We're planning on sending out an e-mail tomorrow with some next steps and updates, as well as responding to all RAC feedback, comments, and questions by end of next week. So, rest assured, we will get to everything; it just might not be within the meeting space itself. We'll do our best.

Again, please raise your hand if you have some feedback or questions.

Throughout the slide deck, there are these little talking head icons on the slides with prompts and questions where we specifically want your feedback in particular.

So yeah, I think we're good to go on that front, and I will turn it over to Anabel.

I do wanna mention, in the chat, we have the contact emails for the HSD Homeless Services gatekeeper, which I think you've all been receiving emails from related to this RAC. That is the contact you should be reaching out to with any further comments, questions, or feedback.

We also have a link to the OHS admin rules website, which is where you can get the RAC materials you received prior to this RAC, if you want to sign up for other rules advisory committees, or just get other information about our rules-related activities.

So now I will go ahead and hand it off to Anabel.

HERNANDEZ-MEJIA Anabel * HCS 11:41
Thanks, Rachel.
So, Jaci will be launching a couple of polls.
The first question before we get into this is, "Have you been on a RAC before?"
Just quickly, we're wanting to get a pulse of where everyone's experience is on this.
And then the next question is, "Have you assisted OHCS in rule filings in the past?" And just another quick question and we'll be getting a sense—
All right, so we're about 50/50.

Stopped transcription at 1:10 PM (PT) (technical issues, not intentional)

Note: Approximately 12 minutes into the presentation, OHCS experienced technical difficulties with the Teams webinar, resulting in an unexpected cessation of the recording and transcript. While OHCS staff attempted to troubleshoot the Teams issues, the decision was made to proceed with the presentation to maximize attendees' time and avoid rescheduling such a large group. As a result, there is a gap of roughly 30 minutes in the transcript (slides 5-24 of the presentation). OHCS made every effort to capture participants' questions from the Teams meeting chats and by taking notes, and responses to feedback and questions received during the gap in the transcript were included in the summary of RAC feedback.

Transcript resumes
September 2, 2025, 1:43 PM (PT)

HERNANDEZ-MEJIA Anabel * HCS 0:04
I am admitting everybody.

BENNETT Rachel * HCS 0:07
Sounds good.
Welcome to the new space, folks. We appreciate you hanging in there with us.
Little adventure for an OHCS RAC. They're not all like this.

HERNANDEZ-MEJIA Anabel * HCS   0:48

Rachel, do you know if we're actually here?

I think we're gonna have to raise everybody because they don't have—there's no presenting.

BENNETT Rachel * HCS   1:00

Right.

HERNANDEZ-MEJIA Anabel * HCS   1:01

So, give me some time, and I'll be transferring folks up.

BENNETT Rachel * HCS   1:09

We'll work on getting everyone.

HERNANDEZ-MEJIA Anabel * HCS   1:09

To presenter mode.

BENNETT Rachel * HCS   1:10

Yeah, the appropriate permissions as folks re-enter the space. So, we'll just take a minute.

HERNANDEZ-MEJIA Anabel * HCS   2:07

Katie, I see your hand up and that helped me see you in the attendees to raise you up. Other folks who were also RAC members, that might be a little bit faster in getting me through some of these. But if you have something to say, go for it, as well.

Katie Gentry   2:31

Thanks.

HERNANDEZ-MEJIA Anabel * HCS   2:39

Awesome. Thank you. I'm seeing the hands.

DAVIS Jaci * HCS   3:18

All right, mics and cameras should be available now.

HERNANDEZ-MEJIA Anabel * HCS   3:30

OK. Thanks, everybody, for raising your hand. It made it a lot easier to catch you.
I am still seeing….

BENNETT Rachel * HCS   4:57

Does anyone else still have a hand up that they can't lower? Because we're not seeing any on our end, so I think we may be good to go.

HERNANDEZ-MEJIA Anabel * HCS   5:04

I still have some folks I haven't—

BENNETT Rachel * HCS   5:07
OK.

HERNANDEZ-MEJIA Anabel * HCS   5:07

I need to move up from attendees to presenters.

BENNETT Rachel * HCS   5:08
OK. All right.

HERNANDEZ-MEJIA Anabel * HCS   5:13

I think I've got most folks in now.

BENNETT Rachel * HCS   5:21
OK.

HERNANDEZ-MEJIA Anabel * HCS   6:08

I've got Colt, and I think he's the last one now.
All right, apologies, I believe I've got the tech issues. Thank you, everybody, for

the patience, and I believe we have everybody that we need to have as a presenter.

BENNETT Rachel * HCS   6:44

OK, Colt, you want to pick it up again? Is that all right?
If we continue to have technical issues, we'll troubleshoot as we go.

SRAY Colt * HCS   6:53

Yeah, happy to. Just pointing out, I think—
I don't know if it's still relevant, but Melanie, in the chat, just mentioned—
OK, got it. Thanks.

BENNETT Rachel * HCS   7:00

We'll keep an eye out.

SRAY Colt * HCS   7:02

Thank you.
All right. Where we left off was the idea of, we ran through shelter habitability standards, recognizing there is a CFR that speaks to a pretty thorough list that I read through. I'm happy to read through that again just to catch us up, but before I do, I'll pause. Thank you for bearing with us in that transition, but on the subject of shelter habitability standards, any more thoughts or feedback on whether these standards represent minimums to keep folks safe and if they are reasonable to meet?
I see a hand up, but the name is not appearing, so feel free to come off mute.

WATJUS Regan S   7:52

Hey. Hi, this is Reagan from the City of Eugene.
I was wondering about an amended, some amended language to the having the shower facilities on site. We have, and wondering if we could change it to, access to shower facilities. We have a couple of programs that could qualify that they have shower facilities next door in, like, another separate site, technically, but nearby.
So, I just wouldn't want to run afoul of that but keeping the intent of it.

SRAY Colt * HCS   8:39
Gotcha, thanks. Thanks, Regan.
Evelyn, please, go ahead.

Evelyn McCoy-Harris   8:54
That same thought, it might be relevant for food preparation. Our organization, unfortunately—well, fortunately, unfortunately, had to dismantle. We dismantled our commercial kitchen and then did not have funding. Had, you know, the plans and everything, but we do have access to be able to prepare meals while our kitchen is under construction. So, maybe with that same thought, access for meal preparation.

SRAY Colt * HCS   9:29
OK. So, another one for kind of clarity of wording on the expectation for food prep, but also the restroom and shower facilities. And there is slightly different wording on the STEPS one that we'll get to, as well, so feel free to take a look at that, and we can kind of compare the two.
Yeah. Thank you both for that.
Any other thoughts or questions? Feedback on the shelter standards specifically before we keep going?

BENNETT Rachel * HCS   10:00
Colt, there is a question in the chat that I'd like to elevate from Brook O'Keefe: Curious how this applies to vehicular STEPS sites. The work group recommendations specified that vehicles supplied by the participants can be used. Alterations to vehicles to provide walls, slash roofs, heating, cooling, etc. May be a barrier or prevent some households from accessing services.

SRAY Colt * HCS   10:23
Gotcha. Thanks, Rachel. And thanks, Brook, for that. Yeah, I think that question will be answered in the STEPS habitability requirements. These ones are specific to meeting the definition of shelter. But Brook, let me know if, when we run through the STEPS ones, if that is still an issue on your end, and I'll circle back.

BENNETT Rachel * HCS   10:49

And another question in the chat from Katie: Does locked door apply to the shelter as a whole?

SRAY Colt * HCS   10:57

So the locked door wording is, we have it specific to basic freestanding structures. The reason being, in the CFR reference there is kind of an overall standard for what, I would say, congregate or non-congregate shelters that are maybe out of a hotel, that the facility itself is secure. The reason we wanted to specify or point out with the basic freestanding structures is due to the fact that it's kind of its own structure and not set inside an existing building, if that makes sense. So, the expectation is that any shelter meeting the criteria would have secure doors, but the one was called out specifically for basic freestanding structure. It's just, on the idea of, like, a cluster of pallet shelters or tiny homes. So that's the distinction, why it's actually called out separately, if that helps. Thanks. Great.

And I see Melanie asked: Heating and cooling in this? Yes, I think, I believe it's under, the title of that bullet point, I believe, is thermal environment, and then it specifies from there, and then walls and roofing.

We shelter in huts. I think that'll be relative in this next slide here, Danny. Thanks for sharing that.

OK. I know we gotta keep things moving, so I'm gonna go to the next slide, and we'll continue to capture stuff in the chat. Thanks, Krystal.

So, as we mentioned, STEPS refers to vehicular camping and basic freestanding structure programs that maybe don't meet all the shelter standards in this manual but provide participants with a place to stay in either their vehicle or in a basic freestanding structure provided by the site when available, that is secure and free from ticketing. So grantees and subgrantees must document how they meet habitability standard requirements for all STEPS funded under this program, and OHCS will provide technical assistance as reasonably requested to support compliance with habitability requirements.

I think we can go to the next slide here, Krystal. Thank you.

So, there is no existing CFRs or other guidance on STEPS, obviously, so this list is a little more comprehensive.

So, I'll read through them and then we'll pause. Feel free to gather your thoughts on this one, as well.

So, you'll see it's pretty similar to shelter but is less, I guess, less restrictive in some key ways, and based a lot on the work group recommendations but also engagement session feedback.

So what we have here is, STEPS must include the following minimum requirements and standards for habitability, amenities, and services: a site management plan that's inclusive of waste management and safety; security of the site, its participants, staff, and volunteers; garbage and sanitation services, including restrooms on site; and access to shower facilities—that one, Regan, would be the key distinction; this is access to shower facilities, not necessarily requirement for it to be on site—potable water available on site; access to electricity on site and adequate lighting; a food access plan—again, not necessarily on site, but which may include community coordination and referrals to local resources—severe weather response strategy for when vehicles or structures are not adequate to keep participants safe during a severe weather event; and then for the basic freestanding structures only, a hard surface floor, weatherproofing, and the ability to close and lock a door—this one would be relevant for the hut specifically with, maybe, not a hard roof but could still fit this criteria.

And just as an FYI, the weatherproofing is not meant to include HVAC necessarily; this is more the materials that the structure is made from. Are they weatherproof? For mostly rain, snow, that type of thing, and usually, with the modular homes, that that is kind of baked into their description, but we wanted to add that. Happy to clarify that further, but stopping there.

Do these standards represent minimums to keep people safe and healthy in these STEPS programs and are they reasonable to meet?

And yeah, I'll go to Regan. Please.

WATJUS Regan S 15:51
Thank you.

Yeah, I think this pretty much covers what we talked about in the work group. I just want to make sure there was some added language in the in the report about—and I think this could be interpreted the way that it was meant to be—but potable water availability on site could include water delivery.

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And then access to electricity on site would also—you know, alternative strategies for ensuring that residents have access to an opportunity to recharge devices and access electricity are acceptable. So, some alternative strategies for that, and that's not electricity to each individual space, but access to, you know, to that on site.

So I think it covers it. I just kind of want to make sure that the interpretation will be the way that the final report, some of those caveats that they have in there.

SRAY Colt * HCS   16:52
Gotcha. Thanks, Regan. And yeah, that aligns with my interpretation of these bullet points, as well. But yeah, we can also provide a more detailed response in writing at some point here after the RAC, but thanks for that.

I thought I saw another hand. I might have imagined that. I'll leave it open just for a moment here to see if anyone else wanted to jump in.

And just to kind of make a fine point on it, I think a few of the main differences I'll just call out that we have between shelter and STEPS. HVAC requirement being a big one. The on-site shower and on-site food distinction, which we've already got some good feedback on. And then the hard roof and walls. So those are the ones that kind of jump out as the main differences. And again, a basic freestanding structure can meet one or the other depending on those standards.

OK, I think we can go to the next slide. And Danielle, if you're ready, I think I'll pass it over to you.

BAUTISTA-SYLTEN Danielle * HCS   18:08
Great. Thanks, Colt. Can folks hear me okay?
All right. Thank you. OK.

SRAY Colt * HCS   18:13
Yeah.

BAUTISTA-SYLTEN Danielle * HCS   18:15
So I am gonna go over proposed rules for policies regarding exit and separation from shelter services. If you're following along in your packet, this is page seven of the packet, or page 17 of the program manual.

So, just some context is that this stemmed out of the shelter work group really thinking that shelter policies can be written as neutral, but could have the potential to disproportionately exclude BIPOC populations. We got feedback from folks and even asked areas of what they're already doing or they're in process, or if they would have expressed interest in TA. And so what we have is a combination of, in most cases, people are already doing or planning to do or express that they would support getting technical assistance to do so. I'm gonna read them off and then I'll ask for some feedback.

So, grantees must maintain clear, documented guidelines and expectations around activities and behavior that may result in an involuntary exit from shelter and separation from services. Participants must be informed of these guidelines and expectations at the point of intake program entry.

Grantees must maintain clear, documented guidelines and expectations around any potential trespass or time bound service restrictions extending beyond one night. Participants must be informed of these guidelines and expectations at the point of intake/program entry.

Any measure restricting a participant's ability to access services should be taken only as the last resort in the most serious cases to protect the health, safety, and respect of participants and staff.

We can go to the next slide please.

In the case of an involuntary exit from shelter or separation from services, grantees must inform participants of their right to appeal, including who to contact regarding an appeal, and information about the appeal process. See also Grievance Appeals in this manual.

Grantees must maintain documentation of any exit and separation of services within the participant file, including any steps or actions leading up to the decision and that were taken to avoid exit and separation from services.

And finally, grantees must conduct regular evaluations of available program data to ensure exit and separation from services decisions do not disproportionately impact Black, Indigenous and people of color and other people from historically underserved communities.

So, thank you. I would like to open it up to folks. Do these policies help create more equitable shelter exits?

Ashley? I see Ashley, and then Evelyn.

Ashley Carson   21:21

To answer your question, I think yes, potentially, they help create more equitable shelter exits, but I'm in reading the manual, I'm just wondering. So it says to refer back to the Grievance Appeals section on page seven, I think.

If a shelter operator has to involuntarily exit someone, is the thinking that notice of, like, a 30-day, calendar day appeal is given and the person remains in shelter while the 30 days plays out, or is the thinking that they're provided documentation about their right to appeal within 30 calendar days? They're still exited, but that appeal could still exist with the organization. Just confused about the logistics of how this appeals process, how you're intending it to work.

BAUTISTA-SYLTEN Danielle * HCS   22:24

Thank you for that question, Ashley. Colt, please feel free to chime in at any point.

The bullet point in this part—where it says in case of an involuntary exit that you must inform—this is just saying that you would provide that information as far as the logistics of the grievance policy. Colt, would you mind speaking to that piece?

SRAY Colt * HCS   22:48

Sure. Yeah, it if I'm getting the question right, and just let me know, the expectation would not be with our appeals process, how it's written, that the person, whatever the situation might be, would be that they'd stay in shelter for that 30 days. I think the intent is, if it's a health/safety concern and that person needs to exit the facility, they would then have 30 days to appeal. They'd be given that information upon exit, but not that they would have to remain in the facility. Just to address that part. I hope that helps.

Ashley Carson   23:25

I think it does. I think there's just confusion about, like, establishing residency rights and what avenues to proceed down when you're needing someone to exit for a health and safety risk. And I don't want to come across as wanting to remove rights, because that's not generally where I stand, but—

SRAY Colt * HCS   23:45
Sure.

Ashley Carson   23:49
I think that some of the appeals language could add to a further lack of clarity around the rights of shelter operators in needing to exit someone in a dangerous or unsafe situation.

BAUTISTA-SYLTEN Danielle * HCS   24:10
Thank you for that feedback, Ashley. And I think, Evelyn, you had your hand up.

Evelyn McCoy-Harris   24:16
Yes. Could you go to the previous slide? I think, let's see, it's bullet point #2 around any potential trespass or time-bound. I think that's where it helps service operators, shelter service operators. Because our organization, we do have to, for health and safety reasons, we do have to have that immediate exit for the other community members that are on staff. So, I believe yes, to answer your question, that this is very clear with regards to the processes that are put in place. And it's very clear with regards to what steps to take with—
Can you go to the next slide, sorry. Thank you so much.
With regards to the appeals process for our organization, if it is a threat to the other community members, we do have to immediately remove them from the property and, again, hand them you know, here is the appeals process, but don't keep them there in the shelter when they pose a risk to other community members. I do think it's clear.

BAUTISTA-SYLTEN Danielle * HCS   25:43
Thank you, Evelyn, for that feedback.
Okay, I don't see any other hands raised. Are there any comments? OK. Feel free if anything else comes up, you can add it to the chat.
I think we can go on to slide 24. OK.
Next, we're going to talk about low barrier and non-exclusionary policies. In your packet, it's page 28, or page 17 of the program manual.
So, the bill requires OHCS to adopt definitions around low barrier, but also that

we would fund 70% of the regions' Statewide Shelter Program-funded beds as low barrier, with the remainder as recovery-based.

And then I'm going to read these off.

So, to be low barrier, they must meet the following conditions.

So, the first one is that sites accommodate service animals and make reasonable accommodations for belongings on site. Accommodations for pets whenever possible, but not required. Accommodations and costs for boarding pets are allowable at the discretion of the grantee or subgrantee.

No charge to individuals or families for stays, meals, or services rendered, and people with criminal convictions, poor credit history, or eviction histories are not excluded.

Youth, family, and domestic violence shelters and STEPS may establish requirements that limit access to individuals with a history or record of prior sex offenses in limited cases. Low barrier and non-exclusionary shelters and STEPS that do not target domestic violence support, youth, or families may establish requirements that limit access to individuals with a history or record or prior sex offenses.

Next slide, please.

Continuing on: sobriety treatment and participation in case management services is voluntary.

Low barrier, non-exclusionary sites may establish requirements that limit the use of drugs and alcohol in common or shared areas of the facility and may establish behavioral expectations that limit disruptive or violent behavior resulting from intoxication; however, requirements to abstain completely from alcohol or drug use is not characteristic of low barrier shelters or STEPS.

No documentation of identification, custody, citizenship, or gender is required. Shelters must meet the U.S. Department of Housing and Urban Development equal access rule, 81 Fr. 64763, to ensure services are available to all individuals and families regardless of sexual orientation, gender identity, or marital status.

So, we have two questions for you. First question is, does this policy help create more welcoming and easier to access shelter spaces, and are these reasonable to meet?

And I see Brook's comment in the chat saying, "Accommodating pets is optional? I thought that was a requirement."

This is based on feedback that we received in engagement that many shelters aren't able to accommodate pets. Whether that's shelter, I'm sorry, insurance requirements for others. And so I think our attempt at remedying that was that we would, shelter should attempt to accommodate pets whenever possible, but we did not make it a requirement.

And if any of my colleagues want to step in and share any other thoughts on that, feel free. Otherwise, I will answer any other questions.

I see Regan. Go ahead.

WATJUS Regan S   29:33

I was hoping to, well, I'd like to suggest that we remove the participation in case management services as voluntary. I think that's new. I don't remember that coming up in the work group as a recommendation and I think that if, I just think we need to, that should be removed as a requirement. I think if the concern is that people would be exited for not engaging in case management services, I think we cover that in the involuntary, the section we just talked about of, you know, exit should be for the most, you know, for violence and for things that are really health and safety, but I think this will be confusing for shelter operators about what expectations they can have for folks around case management.

BAUTISTA-SYLTEN Danielle * HCS   30:29

OK. Thanks for that, Regan.

I see Evelyn, and then I'll go to Melanie and Katie's comment in the chat. Go ahead, Evelyn.

Evelyn McCoy-Harris   30:39

With regards to Regan's comment, does this read that the shelter provider should provide case management service, but it's voluntary? I'm trying to interpret the, reading the wording, yeah.

BAUTISTA-SYLTEN Danielle * HCS   30:58

Sure. Yes, I think we can be clear on this. I think the intention here is that, for the participant, sobriety and treatment and case management is voluntary, that they do not, they are not required to participate in that to stay in the shelter.

Evelyn McCoy-Harris   31:12
OK, the participant is voluntary, not the shelter provider.

BAUTISTA-SYLTEN Danielle * HCS   31:14
Yes.

Evelyn McCoy-Harris   31:16
OK. Because we do provide case management as well because that's part of, as part of our STEP program, if you will.
In regards to the low barrier and the pet, we do allow pets because they are, they are service animals, whether they're documented by a doctor or not. Unsheltered community members only have their pets. That's their family. So I think that that should remain in there, as well. Thank you.

BAUTISTA-SYLTEN Danielle * HCS   31:49
Can I clarify? Make sure I understood?
Evelyn, did you say you think that pets should not should be required? That they allow pets?

Evelyn McCoy-Harris   31:56
Oh, I'm sorry. I said that pets should be allowed as part of low barrier. I understand some shelters do not have the capacity because of, you know, the size, but if the capacity allows, maybe that should be the wording in there.

BAUTISTA-SYLTEN Danielle * HCS   32:13
Great. Thank you. OK. And then going to the questions.
Let's see, we have, "Does that include service or companion animals?"
My understanding is that that does not include service or companion animals. It does not include service animals, and then I'll confirm in the chat a little bit if it includes service animals.
And then, "Are low barrier shelters allowed to have maximum stay limits or requirements for engagement and housing plans in order to extend stays?"
That's a great question. There aren't in our requirements that we propose, that there is a maximum time limit that they can stay in here in order to be low

barrier.

And Melanie, can you speak a little bit more about your question, "What about family identification?"

Melanie Doshier   33:17

Yeah, I think that one of the one of the requirements of low barrier shelter now is that family can show up and self identify their family members and that you have to, you have to allow them to show, to do that. And I don't see it written out here anywhere.

And then I guess I would just like to, in most low barrier programs that there isn't a requirement to engage in case management, even in PSH, but I do think that there is.

I think like, in our shelter programs, there's often, if you engage in case management, then there are extensions, too. So, we have a maximum six-month stay, but if you're engaged in case management and working towards a plan, then you can extend that.

I mean, I think that that's how most of the low barrier shelters in Jackson County operate, but in, like, most rapid rehousing programs and all those things, definition of Housing First and low barrier, that there's not a requirement to engage in this very specific prescribed case management program.

BAUTISTA-SYLTEN Danielle * HCS   34:23

Gotcha. OK, thank you.

Melanie Doshier   34:28

So, I guess my question was, is that self identified families going to show up in the low barrier rule? I believe that it does now in the OPSS grant.

BAUTISTA-SYLTEN Danielle * HCS   34:48

I think it might be addressed in how we are defining "household," that households are self-defined and they appear as one economic unit, but we can make this clear, look to make that clear.

Let's see. I'm gonna give it a second. Colt, is there anything that you want to add to anything we've shared so far before I go on to the next question?

SRAY Colt * HCS   35:14

Not at the moment, no. I'm responding to a few things in the chat, but nothing else I would add currently.

BAUTISTA-SYLTEN Danielle * HCS   35:21

Great. OK, let's see.

I'm gonna go to the next question: Does the language "the requirement to abstain completely from alcohol or drug use is not a characteristic of low barrier shelter/STEPS" mean that such requirements are viewed as not best practices, or does it mean grantees are not allowed to create a complete abstinence rule for the— OK, I think I understand the question. So, to be considered low barrier, there cannot be any requirements around abstaining from alcohol or drug use. There are recovery-based shelters where allowed. Thirty percent of the program-funded shelters can be considered recovery based, where they can require that someone either participate in treatment services or abstain from drugs or alcohol, but not in low barrier shelters.

And let's see, Brooke's comment: My concern is that if shelters are given the option, many will choose not to, even if they can. I have had this conversation with emergency shelter operators across the Balance of State, and many don't want to take on pets, even if they have the capacity to do so.

OK, thanks for that, Brooke.

Let's see. Are there any hands up that I'm missing? Oh, there are two. Sorry.

Go ahead, Thomas, and then Kate.

Thomas McGregor   36:45

Thank you. This is Thomas in Roseburg. Operate a 20-family shelter for domestic violence/sexual assault survivors. My team, the language is fairly good, but there is the complexity that we have that our goal with our shelter is to provide safety to all families. Some of the families have child welfare services as a part of their life, and so then this potential allowance for alcohol and drug use kind of creates some complexity there with some of the families that are also navigating child welfare concurrently. And so I see 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.

BAUTISTA-SYLTEN Danielle * HCS   37:35

Thank you for that comment, Thomas.

OK, Kate.

BUDD Kate A   37:40

Thank you. I just want to highlight what Melanie mentioned regarding case management being voluntary as a core part of being a low barrier shelter. It is very much an integral piece of being low barrier, and so I really encourage that that remain within the requirements. I also want to stress that as you're bringing in regional coordinators across the state, the more black-and-white you can be around requirements, the better. And I recognize that the State wants to try to encompass, you know, what it is that it's hearing, but it's also putting the regional coordinators in a really hard place because they may be working to try to, like, move, you know, shelters in one direction, but really, if it's not black-and-white, then they can't actually, like, require it. And so it's a real challenge, and I want to encourage the State to, you know, choose one end or the other and move that forward as opposed to having a lot of gray in guidelines that then have to be translated by a regional coordinator.

BAUTISTA-SYLTEN Danielle * HCS   38:52

Great. OK.

Melanie Doshier   38:53

And I just wanted to, like, to really drive that in all Housing First programs. If you read the definitions of what that means, it is about the lack of engagement in case management. Now there is a key moment in which you can start requiring engagement in case management, and that's when you start providing financial assistance to a household. So if you are paying deposit assistance or if you're paying application fees or buying them work supports or doing these other things where using housing-focused dollars on the household, at that point you can, there can be a requirement to engage in a case management plan and a housing focused or housing stabilization plan. So there are rules out there and best practices that we can point to that say when these services become available, then the engagement level changes, and then at that point it really is

defined and determined by the case manager of what that level of engagement looks like. So we don't have to create this process because it exists out there.

BAUTISTA-SYLTEN Danielle * HCS   40:02

OK. Thank you.

For time, we're gonna keep moving us along from here, but continue to add things to the chat.

So, we're gonna move on to our next slide. I'm gonna pause for just a moment to confirm with our facilities how we are on time. OK.

BENNETT Rachel * HCS   40:24

I think we're doing all right for now, so let's keep forging ahead and we'll see how it goes.

BAUTISTA-SYLTEN Danielle * HCS   40:29

OK, sounds good.

So, this is Colt. I'll hand it over to Colt.

SRAY Colt * HCS   40:36

Thanks, Danielle.

OK, there is a part of House Bill 3644 that requires OHCS to develop a formal grievance system to review and track and mediate disputes between shelter providers and regional coordinators. It also notes in the bill the system may not issue orders or otherwise adjudicate disputes. So the process we're reviewing now is, uh, getting at that requirement and would ultimately live in the program manual. Just an extra note, not to be confused with any grievance policy related to clients. This one is specific to the regional coordinator model as House Bill 3644 kind of outlines it, and so I'm gonna read through the text quickly here. This OHCS process is to provide support for regional coordinators and program providers where disputes have been unresolvable through established channels. Note that this process does not replace or supersede legally binding agreements, statute, or administrative rule, nor provide binding orders or resolutions.

And so the process starts with: Prior to submitting a formal request for support,

program provider—so that would include shelter operators and/or regional coordinator—must have made a reasonable attempt at reaching a resolution without OHCS involvement. Such attempts must be documented and maintained by regional coordinator. If no resolution is reached between provider and regional coordinator, the request can be submitted.

And we can go to the next slide here.

The next part: OHCS will respond to any submission within five business days and may request additional information and/or schedule a discussion no later than 30 business days after the initial submission of the request for support. OHCS would then provide a written summary to all the parties involved.

And then we have: OHCS will maintain a detailed tracking system for all disputes that will include, at minimum: all the requests for support submitted; meeting minutes from any discussions with relevant parties; and then those written support summaries we just mentioned; and along the way, contact information for all relevant parties and OHCS staff involved with each dispute.

And so, I know we're moving quickly at this point in the interest of time, but pausing there, does this process land for folks in meeting the legislative intent to create a formal grievance system to track review and mediate disputes between regional coordinators and shelter operators?

And so I will pause there.

Yeah, Evelyn, please.

Evelyn McCoy-Harris 43:32

I think the last bullet point would need to be what you just said, resolution. I don't actually see that here, unless I missed it. But resolution, that will be the last bullet point.

SRAY Colt * HCS 43:52

Gotcha. Thanks, Evelyn.

And yeah, Regan, go ahead.

WATJUS Regan S 43:57

Yeah, maybe along that same line, I think maybe something between the 1st and 2nd bullet point on this slide would be helpful to kind of clarify how these, you know, how disputes would be approached, process reviewed, who does,

you know, who's doing it? What's the basis of the decision-making standard? Like, what is the written support summary based on?

SRAY Colt * HCS   44:30
Thanks.
Kate, go ahead.

BUDD Kate A   44:34
It feels important to make sure that the scope of which the grievance would need to be within is clarified. My understanding is it's related to, you know, the Statewide Shelter Program rules and operations manual, and that feels really important to specify.

SRAY Colt * HCS   45:03
Thanks, Kate.
Melanie, I see your comment in the chat. Go ahead.

Melanie Doshier   45:07
I was gonna say the same, very similar thing to what Kate said. When we have a grievance in a program participant and there's very specific things that they would be able to submit a grievance upon about or, you know, around the terms of their exits, or if they've been, you know, treated unfairly, those types of things.
And I think back to Kate's point around the being very black-and-white in some of these things, so that the more gray you are with this process, there is going to sometimes be some decisions made at the local level that may not be that we need to put those rules into place because that's the way that it's going to best work in our areas, but if it's very gray in the book—I don't know why I'm having a hard time with that word—then there's gonna be a lot of grievances for OHCS to deal with.
So the more black-and-white you can be here around these things, the easier it's gonna be for us to be able to do what we need to do. For the regional coordinators, that is.

SRAY Colt * HCS   46:28

Thanks, Melanie.

OK, I think we can jump to the next slide here, and I'll turn it back over to Danielle.

BAUTISTA-SYLTEN Danielle * HCS   46:42

OK. Thanks, Colt.

So, OHCS is required to adopt a funding formula in rule, and there are two pieces of that funding formula that we need to consider. The first one is the needs of the region, and then past performance. Past performance is a newer piece, so we include this question in our engagement. Got a lot of feedback, particularly around past performance. And another thing to keep in mind is that data sources included would need to be available at the county level.

Some other context is that the legislature included a budget note for shelter that requires OHCS to develop recommendations that incorporate shared funding between state and other funding sources, so you'll see some of that reflected in here.

So our proposal is that we have an approach that identifies factors that integrate into an allocation model, but for the purposes of rules, we want to have some flexibility in how we apply those measures. So, for example, in here, the initial year and subsequent performance periods will look different. So, for the past performance part of the formula, OHCS recommends that this element would not be included until the 27-29 biennium at least a year after data collection from the regional coordinators to establish a baseline for past performance metrics.

So, I will go read the proposed text, which can be found in page seven of your packet.

OHCS shall implement a funding formula for the first year of SSP funding, covering the period July 2026 to June 2027. This funding formula will be updated periodically to reflect performance of the system and changing needs in accordance with House Bill 3644, section 28. All data sources are determined by OHCS and are subject to change. So, that includes the funding formula calculation used to determine need, and past performance by region may integrate the following information: number of beds funded by SSP existing at beginning of the relevant regional plan coverage period; total cost per SSP supported bed for region for previous performance period; homelessness count

measured by most recent validated count; McKinney Vento, student homelessness count for the most recent validated period; housing availability; low-income households; non-state shelter funds utilized in previous performance period; non-state shelter funds availability identified in most recent regional plan; shelter utilization from previous performance period; percentage of unduplicated households served by program who exited to a permanent housing destination; percentage of unduplicated households served an emergency shelter who exited to "place not meant for habitation"; percentage of funds spent down for most recent performance period; and other factors deemed appropriate by agency.

And I'm going to pause for just a moment, check in on time keeping. OK. All right.

Are there any feedback? Does this funding formula capture the needs and past performance of the region?

And we'll just take a couple comments, and then we can add those in the chat. Go ahead, Kate.

BUDD Kate A 50:10

Thank you. So, there's the third point around the homelessness count, and I presume it's the point in time count that is being referenced. And I think it would be important to call that out.

And then regarding the recent validated count, I also presume we're talking about the HUD validated count. So, specifying that as well feels important.

I also want to note with the non-state shelter funds utilized in previous performance and then also identified in the regional plan, I recognize that this was something that the legislature identified as important, but it also very much puts communities who, you know, just do not have a wealth of funding available disproportionately, you know, add a challenging situation to be able to just maintain their shelter beds, let alone grow, especially where it's needed, so I do have significant concerns with bringing in that piece of the puzzle.

And then lastly, there's the point regarding shelter utilization for previous performance period and at this point it's not something that I understand OHCS is collecting as far as shelter utilization, and would want to be very involved with conversations that OHCS is having around shelter utilization, because

particularly, we've just created three different shelter types. And so, we don't want to compare apples to apples around utilization within those three shelter types. So, there's a lot of factors that go into that particular piece of the formula that really need to be worked out by OHCS.

Thank you.

BAUTISTA-SYLTEN Danielle * HCS   52:07

Great. Thank you. And we'll just go on to Alexandra. And then, continue to put things in the chat and we'll try to respond that way.

Go ahead, Alexandra.

Alexandra Ring   52:17

Thanks, folks. Just kind of want to piggyback off what Kate started with on the non-state shelter funds utilized during the previous performance period. I think as we continue to see federal fund cuts and all of those things hit, especially, you know, not just the state but local governments hard, the ability of cities and counties who have been funding shelters is potentially diminished, and so I think we'd want to see greater parameters around, like, how I know it's a goal of, you know, the state legislature to have those considered, but greater parameters around how we're considering that whether or not funds may continue to be available. Most of our local governments are facing severe budget cuts just like the state is and so, you know, there's not necessarily going to be funding, you know, if we're looking between, you know, funding, you know, clean water and shelter, it's an incredibly tough decision. And so, kind of making sure that we're not putting local governments in the position where we're not able to provide shelter to our residents, but we're also not, you know, it just is quite tricky.

BAUTISTA-SYLTEN Danielle * HCS   53:30

Thank you, Alexandra.

And if folks have questions, you can continue to put them in the chat.

And we are going to move on to the next slide with Colt.

SRAY Colt * HCS   53:43

Thanks, Danielle.

I'll be taking feedback on this one in the chat exclusively, just in the interest of

time, needing to move to the fiscal impact statement. So I'm gonna read through this and then please provide comments in the chat, and I'll pass it back to Rachel.

But the language here is derived from the piece in House Bill 3644 that states the department shall adopt rules to administer the program, which must include requirements of agreements between regional coordinators and shelter providers, and the language here is intentionally broad to hopefully provide flexibility to regions, as these agreements are developed.

The text currently reads, "Regional coordinators may establish agreements with providers that meet the requirements of ORS 458.610(6) to provide services in the Regional Coordinator's service area. OHCS may request to review agreements to ensure alignment of agreements with program and policy intent."

And just FYI, that statute reference is simply where "organization" is defined in the context of OHCS programs, so nonprofit, Housing Authority, local government, or federally recognized tribe.

And the question that hopefully folks can weigh in on in the chat is, does this help ensure that agreements between Regional Coordinators and the shelter operators are in alignment with House Bill 3644?

With that, I'm gonna pass it to Rachel.

Thanks.

BENNETT Rachel * HCS   55:12

Thank you, Colt. I appreciate it. Let's see if we can move to the next slide.

We are going to try to spend just under 20 minutes with our impact statements and then we'll kind of give a update on our timeline at the very end. So, next slide please.

So we've got some bullets for our draft fiscal impact statement. If we could have folks put in the chat either if this aligns with your expectations or understandings, there are things we should adjust, or if you have questions about how we arrived at each of these impact statements, put that in the chat. We'll respond to what we can as we go or outside of the meeting space, so utilize that liberally.

The draft fiscal impact statement: "The proposed rules will have a fiscal impact on state agencies, local governments and the public. For OHCS, the primary impact includes staff time and resources to administer SSP, conduct monitoring, and provide technical assistance. These costs are covered under current service

level administrative funding and Operational Supports funding in House Bill 5011 from the 2025 session." Next slide.

"For local governments serving as grantees or subgrantees, administrative and reporting costs are also incurred but are reimbursable up to 15% of each award." And I want to note that that highlighted language has changed since we sent the materials to the RAC participants. It previously said up to 2% or 8% of each award, depending on organization type and grantee versus sub grantee, so it is now proposed to read "up to 15% of each award."

"For non-participating agencies, there is no fiscal impact. The public benefits economically through access to stabilizing services like emergency shelter and housing focused activities."

So, does this draft statement align with your perspectives and views as an impacted community member? And again, it is OK to just affirm it either just with a "yes." Any adjustments you'd like us to make, or any questions about how we arrived at these statements?

Yeah, I thought the greater admin percentage would be supported.

Right.

Melanie Doshier   57:33

Can you quickly _____ for local government?

BENNETT Rachel * HCS   57:44

Question cut out a little bit there. What? What is the clarification?

Melanie Doshier   57:50

I guess I'm just wondering why it's only local government serving as grantees or subgrantees, why the—where the fiscal impact statement is coming from.

BENNETT Rachel * HCS   58:02

Yeah, okay.

Melanie Doshier   58:06

Sorry, my dog just started barking very loudly, which is why I muted myself.

BENNETT Rachel * HCS   58:10

Totally understandable. I don't know if we have an answer for that in this moment, but if our program folks do have an answer, if we can put it in the chat, and if not, we'll find out.

Let's move to the next slide.

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

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

Again, do these draft statements align with your perspectives and views as an impacted community member? If there are maybe businesses that we haven't considered that may be impacted, or possibly negative effects that we haven't considered and should highlight. Or if you question the number "100 to 150"; that sometimes has come up in previous RACs.

All right, think about that.

We'll move on to the next slide, please.

Small business involvement. There is a requirement that we involve small businesses and get their feedback on impacts in our rule making process, which is why this is included.

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

So, in evaluating whether this impact statement aligns, consider whether maybe alternative opportunities should have been provided, if other types of small businesses should have been consulted, or if you feel like this is an appropriate way to get this kind of feedback.

Let's move on to the next slide.

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

Next slide.

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

Okay, does that seem like we've covered what you would reasonably expect to incur? Are there any broad categories we might be missing? I did see earlier up in the chat there was a question about no third-party services being required, and I think that's just to say that it is optional but not something that would be specifically necessary as a result.

Insurance. That's a good call out.

Kate, go ahead.

BUDD Kate A 1:03:00

I just want to encourage OHCS to consider having a line item specifically for, you know, reporting and data. That has existed in the past and has been very helpful, particularly for the communities that have their own HMIS systems.

And also would encourage particular call out for the capacity building, as well, as opposed to what I see right now, which is each shelter type being able to utilize capacity building costs as opposed to the broader regional coordinator allocation having a capacity building line item.

BENNETT Rachel * HCS 1:03:47

Thank you, Kate. I appreciate that. That makes sense.

Okay, let's move on to our next one, and I believe it is our last impact statement.

"According to the 2024 Point in Time Count, Oregonians who are black,

indigenous and people of color experienced homelessness at higher rates than their proportion of that population. The SSP rules and program guidance as implemented by rules are designed to improve outcomes for BIPOC communities. For example, SSP rules create low-barrier policies, shelter exit policies, and a regional plan that aims to create equitable access to shelter and equitable outcomes from shelter to permanent housing."
Next slide.
"The SSP rules related to the regional plan also work toward more inclusive strategies to engage those with lived experience and subpopulations most impacted by homelessness to inform regional strategies. These elements reflect OHCS's commitment to equity."
Does this draft statement align with your perspectives and views? Are there questions about specifically what is meant, or anything maybe that we are missing that you think we should include?
Kate, go ahead.

BUDD Kate A   1:05:17
Thank you.
I just want to highlight I appreciate the increase in the admin being proposed, but the current understanding that I have of our current fiscal year allocation of 2% admin for the Regional Coordinator, 8% for the agency, we're hearing the greatest feedback of concern from our culturally specific agencies in that they, you know, they of course need to make sure that their admin costs are covered. And so I just encourage OHCS to continue to reflect on the impact this very low admin rate is having on those who are, you know, most greatly affected by houselessness and the culturally specific agencies that are serving them.

BENNETT Rachel * HCS   1:06:07
Thank you, Kate.
Okay, so we've reached the end of the impact statements. We do have some wrap-up tasks and I think, Krystal, if you'll stop sharing your screen briefly, what we want to do next is we're going to cover the overview of the feedback we captured from you today as best we could. What we're going to ask is that if we seem to have captured everything or most of everything, because obviously there was a lot happening in the chat, we will have to fold that in later, but if

we've at least got the highlights. Let us know if there's anything you want us to elevate that maybe we did not capture in the following slides. Please correct us in the chat, and after we review that, we'll go over the timeline for what comes next. So, Krystal, if you can share your screen, we'll make sure that all those comments have been captured on the slides and I think it's slide 41, 42.

HERNANDEZ-MEJIA Anabel * HCS   1:07:10
Yes.

BENNETT Rachel * HCS   1:07:13
Excellent.

HERNANDEZ-MEJIA Anabel * HCS   1:07:17
And what we'll do, just because we're also running pretty short, we'll just let leave it on the slide. You can kind of read through like Rachel mentioned. I was also trying to get some of the things fixed in the back end and so I know I missed on some of the first policies, capturing some of those notes, but I know my colleagues here have some of them, as well. So, if you can kind of look through and just give a general thumbs up, things that you really want to make sure or are not included correctly worded, maybe put that in the chat. We will definitely be capturing all of that.
But if you can give a thumbs up or put it in the chat if it generally aligns with what you were saying today. We've got a few more.

BENNETT Rachel * HCS   1:08:09
What we'll do is this slide deck will be going out to our RAC participants tomorrow and posted publicly on the admin rules website probably sometime between now and early next week, so you'll be able to see what we captured. If we have any feedback on the accuracy, just let us know.

HERNANDEZ-MEJIA Anabel * HCS   1:08:38
Evelyn.

Evelyn McCoy-Harris   1:08:40
The on-site food and water—food, shower and food. I think we said "access to."

HERNANDEZ-MEJIA Anabel * HCS   1:08:47
All right. Thank you.

Katie Gentry   1:09:15
I lost my ability to raise my hand, but I actually heard quite a bit of mixed about case management as optional and how that was in direct contrast to housing focused shelter services, so would be curious about having greater conversation about that on your next slide. The agreement with case management as optional, there was a lot of conversation about case management, the requirement to participate in case management 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, and so I would say we would say that folks need to be continuing to be moving towards a housing resolution to stay in our shelters, and what that looks like may look different for every single person, but you can't just stay in shelter indefinitely and continue to get services. We need the ability to have folks be engaging in that case planning with us.

HERNANDEZ-MEJIA Anabel * HCS   1:10:32
Thank you, Katie.
Megan, I got your comment in the chat. Thank you.

BUDD Kate A   1:11:00
I appreciate the conversation around the case management. I think for me, there is that difference that I think Katie was suggesting, too, that that case management can be optional and progressing towards someone's identified, like, housing goals, like that can be an expectation. So I think that there's a difference, and again, it really goes back to what being a low barrier shelter looks like and that folks should be progressing in whatever way they've identified for themselves, which for some people it could be enormous steps forward, and for others that could just be baby steps.

HERNANDEZ-MEJIA Anabel * HCS   1:11:43
Thank you.

And also for folks that are just agreeing and giving thumbs up, that is also helpful in the chats.

OK. Noted on the DVSA comments, as well. And like I said, we definitely have things missed, especially myself, going back and forth, so I really appreciate naming some of these things and to make sure that one of us can get those down.

Kate.

BUDD Kate A 1:12:46

Thanks. I wanted to go back to the grievance between the shelter provider and the regional coordinator and just clarify that it does feel important that the scope of what can be grieved is identified within the operations manual. You know, you can't grieve because theme color was purple, for example. Doesn't have anything to do with the operations.

HERNANDEZ-MEJIA Anabel * HCS 1:13:11

Thank you. Got it down. All right.

And then Ethan.

NELSON Ethan A 1:13:34

Yeah. Thanks.

I just would join in or just add on to this. Ethan Nelson from the City of Eugene, and I just participated in the initial work group. I think that in my recollection that the part on the grievance, you know, the City of Eugene provided a comment on that, and I think what I recall was that there was it's not, it was really about like how as we're shifting on into a regional approach, what's that role? How does OHCS navigate grievances potentially between shelter holder, shelter providers, and then the definition cities or that and then a regional entity? And so I think Kate's question is really good about what's the scope, and I think originally it wasn't just any operational issues that were coming up in the in a potential contract, but also about how that regional plan is formed, what's included in the regional plan, and making sure that there's an inclusive aspect for a region 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 agreed upon plan or plan that's being

adopted doesn't incorporate all of those elements. How does one navigate that? So I think I would ask that doesn't get lost within the moving from work group to the statute to then the Rules Committee. Thank you.

BENNETT Rachel * HCS   1:15:08

All right. Thank you all for your feedback, and we will continue updating the comments captured as we go.

Just a preview of our next steps. After today, we'll be sending communications to our RAC participants with the slide deck. We're going to ask that if you have additional feedback about the impact statements, the rules, the program guidance, any questions, anything that you want to make sure that we address in a follow-up, please get that to us by September 9th. Then we will post all of our responses on our OHCS admin rules website by September 12th, and then we'll send a communication to the RAC participants to let you know that's been done.

We are continuing to get feedback from our procurement entities and DOJ regarding these rules, so they will likely look different by the time we post the notice of permanent rulemaking, which will come out October 1st, and that will begin our public comment period. I believe we have a public hearing currently scheduled for October 15th. Anybody may attend. You can offer a comment at that time. We will be there just to receive that information. It won't be as much of a dialogue back and forth; it really is just a space for us to hear from the public regarding our draft rules. And so the notice of proposed rulemaking is going to include our impact statements, which we're going to update as a result of this meeting, the draft rules, and the program guidance. So we will also let our RAC participants know specifically when that hearing is happening and kind of give you more direct communication for those of you that may have already signed up to receive notices of rule making.

So, once we conclude our public comment period, which will be I think October 28th or 29th, we then have to wait a little bit longer for the legislative comment period to end. Any changes that we need to make as a result of these comment periods will be done in November, and our final permanent rules will be filed by December because that is a legislative requirement, that we have rules effective as of January 1, 2026.

And we will keep our RAC participants informed as we move through these various stages.

I think that covers our timeline. If you want to move to the final slide, I'll close us out.

Thank you all so much for bearing with us through this rather unusual circumstance with our Teams webinar. I think we've all received some very valuable feedback on our draft rules and impact statements. We really appreciate you putting in the time and your attention. If you have any questions about the content any of the materials provided, please reach out to the gatekeeper e-mail address shown here: HSDHomelessServices@hcs.oregon.gov. You can also reach out to me, Rachel.Bennett@hcs.oregon.gov, if you have questions about our rules timeline.

I do see a hand raised. Quickly, if we want to, I can field that question.

Bradley, Derek 1:18:47

Hi, thanks.

Derek, City of Portland. I was just hoping that the slide deck with all the notes and comments could be made available before the feedback deadline on the 9th so I could share it with people on my team.

BENNETT Rachel * HCS 1:19:00

We will do our absolute best.

Thank you all so much. I really do appreciate your time and commitment to the State and for engaging with us here at OHCS. Please have a wonderful afternoon.

BAUTISTA-SYLTEN Danielle * HCS 1:19:19

Thank you.

Stopped transcription at 3:30 PM (PT)

TRANSCRIPT – PUBLIC COMMENT HEARING
October 15, 2025, 4:04PM

BENNETT Rachel * HCS   0:03

The hearing is now in session and is being digitally recorded to aid in creation of a complete record of the rules process.

Again, my name is Rachel Bennett, my pronouns are she/her, and I'm the hearing officer. The date is October 15, 2025, and the time is 9:04 AM Pacific Time.

The purpose of this hearing is to provide an opportunity for public comment on the rules proposed for adoption by OHCS for the Statewide Shelter Program, or SSP, in connection with House Bill 3644 from the 2025 legislative session.

The rules proposed for adoption are Oregon Administrative Rules 813-275-0010, -0020, -0030, -0040, -0050, -0060, -0070, and -0080. The adoption of rules includes adoption of the SSP program manual in OAR 813-275-0030.

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

In addition to presenting oral comments at this hearing, written comments may be submitted until 5:00 PM Pacific Time on October 29, 2025, which is the close of the public comment period. Please submit comments to the hearing officer—that's me—at Rachel.Bennett@HCS.oregon.gov. Comments received after 5:00 PM Pacific Time on October 29 will not be reviewed or considered by OHCS unless the agency decides to extend the public comment period for everyone.

OHCS will not respond to questions or comments during this hearing. After the close of the public comment period, I will prepare a report to OHCS capturing all comments, and it will include relevant responses. The hearing officer's report will also be posted on our administrative rules website.

OK, I will begin taking comments now. Again, please raise your hand using the virtual hand-raise option, and we'll go down the list starting with Monica.

Monica Steele   2:34

Thank you.

Good morning, and thank you for this opportunity to provide feedback on the proposed rules for the Statewide Shelter Program.

My name is Monica Steele, and I'm the assistant county manager for Clatsop County.

Clatsop County has had the highest rate per capita of homelessness in Oregon for multiple years. As a small rural county, we face questions—sorry, we face unique challenges. Our tax base is limited, and we do not have the same access to supplemental funding sources that larger urban counties can leverage.

Thanks to state funds from the last biennium, Clatsop County was able to open 80 new shelter beds and rehouse over 200 households. These investments have made a real difference in our community. Looking ahead to the implementation of House Bill 3644, we appreciate the state's commitment to building a sustainable statewide shelter system; however, we have several concerns with the proposed rules as drafted, particularly regarding how they will impact rural communities.

First, the proposed rules add new reporting and coordination requirements for providers at a time when agencies are receiving less funding to maintain the program. This combination of increased administrative demands and reduced funding suggests a disconnect between state expectations and the operational realities of local implementation. We encourage OHCS to streamline reporting and coordination requirements, especially for rural providers with limited capacity to ensure program expectations remain achievable. Further detail and specific recommendations will be provided in Clatsop County's written comments.

Another concern is the proposed funding formula, which relies on factors such as existing shelter beds, housing availability, and prior performance. These criteria naturally favor larger urban areas and put rural regions like Clatsop County at a disadvantage. It is imperative that OHCS adjusts the distribution formula to better reflect rural realities by accounting for challenges such as housing supply and fewer existing beds. This will help ensure funding is allocated more equitably across the state.

We're also concerned about how the proposed [sic] affect regional coordination and local control for rural regions. Flexibility is critical to tailoring strategies that work within local conditions and provider dynamics. The lack of clear boundaries between the roles of OHCS, regional coordinators, and providers could encourage individual providers to bypass regional coordination when they disagree with local guidance. We feel strongly that the Statewide Shelter Program rules should preserve and strengthen the role of regional

coordinators as the central point of contact for program administration. Direct engagement between OHCS and providers should only occur through the established grievance process to maintain clear accountability and collaborative decision making at the regional level.

Finally, the grievance process itself lacks clarity. As written, it could allow individual providers to challenge not just implementation but the content of regionally developed plans. This could undermine collaborative local decision making and the intent of regional coordination. We ask that OHCS clearly define the scope and authority of the grievance process so that it is limited to resolving implementation disputes, not revisiting local decisions that have been made collectively through the regional planning. OHCS's role should be to facilitate resolution and uphold consistency, not to override local decisions developed through collaboration.

In closing, we appreciate OHCS's work to design a program that supports communities across Oregon. As the state transitions from an emergency response to a permanent system, we urge OHCS to ensure that the rules recognize the distinct realities of rural regions and reinforce a framework that supports local flexibility, equitable funding, and effective regional coordination. Thank you again for your time and for the opportunity to share Clatsop County's feedback, and I'm happy to answer any questions.

BENNETT Rachel * HCS   6:36

Thank you, Monica. I appreciate that.

Any other comments? Any hands up? I do see some names in the chat, but I want to make sure.

Okay, I'm gonna call on some of the names in the chat to make sure.

Anna Pendas, do you have comments for the record?

Anna Pendas   7:06

Nothing really prepared.

I would echo a lot of what Monica shared.

BENNETT Rachel * HCS   7:11

Thank you.

How about John?
OK.

John Lodise   7:25
Yeah, let me let me come on camera here.

BENNETT Rachel * HCS   7:27
Sure.

John Lodise   7:29
Yeah. There we go. Yeah.
So, I'm John Lodise. I'm the director of the Shepherd's House Redmond Center. I wasn't planning to comment, but I think, after hearing Monica speak, a couple of thoughts come to mind.
First, there is if, as should happen, we're trying to obtain funding not just from a single source but from multiple diverse sources, that can sometimes put the service provider in the middle because these sources do not coordinate with each other. They—or, they cannot always because they're in different realms. So we could have faith-based sources, we could have other private donors, we could have public agencies, and they would all have their diverse concerns, especially with regard to reporting and metrics, and that sort of puts the service provider in the middle of trying to please all of these different areas just because we are trying to be diligent and obtain funding from any possible source that we can. A lot of times, the basic goal is we want to get unsheltered people into shelter where it's easier to work with them in order to move them either directly out of homelessness or at least further along the continuum where they have a higher chance of moving out of homelessness. If we become too distracted by trying to meet all of these diverse reporting concerns and administrative concerns, it's going to dilute the impact of the work.
I would also say that, in some cases, requiring us to collect information from low barrier guests can be impossible or actually at odds with what low barrier's supposed to be. Low barrier's supposed to be "no questions asked," a person is safe and cooperative and just needs basic services to survive and stabilize and isn't required to do much more than that. If we have requirements that make us get information out of guests, we're not—we're in a catch-22. We can either

serve the guests—and that's great, that's what we want to do—but we won't be fulfilling our reporting requirements, or we only serve guests that will fulfill the reporting requirements, which, frankly, I consider to be anathema for the work that we need to do.

I appreciate the last few years, 'cause I think there has been more and more realistic acknowledgement by everyone of what low barrier requires, but I would just urge that that reality always be kept in mind.

And I also guess my last comment is, whatever system ends up being in place as a result of this program, there needs to be ongoing regular and easy communication between the service providers and the folks who are administering this program because that's how it'll end up making the most sense.

So, thank you for hearing me. I think that's about all I have to say.

BENNETT Rachel * HCS   10:47

Thank you, John. Appreciate it.
I also see in the chat Nicole.

Nicole Merritt   10:56

Hi, yeah, thank you. I think John spoke for our organization. I'm the director of operations over all of our contracted work, and we'll put something in a written statement, as well.

I'd just like to touch base on the requirements of transitioning to housing.

In communities where affordable housing, low income to 30% AMI is not developed in our area. So there's a large concern to have a metric be "increased transitions into housing" when that that is outside the control of the service provider, that that be an opportunity in our community.

Anna Pendas   11:46

I was just rereading through things and also thinking about the—
It feels in conflict that we are talking about evaluating shelter programs based on their ability to move people into housing when things like housing costs are unallowable expenses. Things like housing deposit, rent arrears, rental payments, utility deposits, utility arrears, those things. It feels like those are in conflict with

one another. And asking shelter operators to connect people to housing placement without having funding availability to do so seems a little backwards.

BENNETT Rachel * HCS   12:32
Thank you, Anna.
Sam.
Sam, looks like you're muted.

Sam Engel   12:46
We're still recovering from quite a bit of lost housing down here, and then one of the datasets that we look at quite a bit in Southern Oregon is the collaborative report that was put out between Oregon Housing—sorry, Oregon Community Foundation and Echo Northwest a couple of years ago that pointed to the 20-ish year lack of housing development in Oregon. We recognize that that is one of Governor Kotek's goals, to roughly double the rate of housing production from the 18,000 level to 36,000. We also have read that there's only about 7,000 new housing starts in Oregon this year, and so looking at where people would accept shelter and transitional housing too is incredibly important, and making sure that that's part of the reality that we're evaluating shelter success on. Thank you.

BENNETT Rachel * HCS   13:37
Thank you, Sam.
Anyone else? No other hands raised or anyone in the chat, but I want to make sure we get folks who are interested in commenting.
Go ahead, Sam.

Sam Engel   14:03
Not to be only problem-oriented, so I wanted to offer a solution.
We are increasingly looking at stability, especially for our low barrier guests, folks that are not exiting and re-entering shelter on a regular basis that are instead able to, through case management, achieve a level of stability that puts people into a better position to go with inpatient or outpatient treatment, if that's appropriate, or to find other—

Anyway, looking at shelter stability as a way to measure success, as well, especially for folks that have historically been in and out of shelter and are trying to either achieve sobriety or achieve placement in either more stable, case-managed shelter or transitional housing.

Thank you.

BENNETT Rachel * HCS   15:02

Thank you, Sam.

Any other thoughts or questions? I know a lot of folks sometimes come just to hear what other folks have to say, but don't be shy.

OK, well, I will remind you that any written comments that you wish to submit—I know some folks indicated they're gonna send additional written feedback—but any comments you wish to send to us, please send by or before 5:00 PM on October 29th. Again, we're not going to really respond to any questions here in this hearing; we're just trying to gather the feedback.

There are links in the chat for the administrative rules website, where you can get more information about how we've gotten to this point with these rules—there's a pretty comprehensive RAC feedback summary that was provided after our Rules Advisory Committee—as well as postings on other administrative rules that OHCS is working on.

If you want to send anything our way, please send it to my e-mail address, and that is in the chat but I'll repeat it. It is Rachel.Bennett@hcs.oregon.gov.

I want to thank everybody for attending. We really do appreciate our engagement spaces and folks coming out to tell us what they think.

It is now 9:21 AM and the hearing is adjourned. I will stop the recording at this time, and again, thank you so much for attending. Have a great rest of your day.

BENNETT Rachel * HCS stopped transcription

Appendix – Public Comments

PUBLIC COMMENTS RECEIVED

Public comments and OHCS responses thereto are summarized above. Below are reproductions of the full text of comments and attachments sent to OHCS during the public comment period.

1. Email Received

Sent: October 14, 2025
To: danielle.bautista-sylten@hcs.oregon.gov
Subject: FW: Proposed Rulemaking: Statewide Shelter Program

Hi Danielle!

Kate suggested I reach out to you for this question. I really, really like the changes in this newer draft – and – at the time we were giving feedback on some of these items, what I expected in funding is very different from what I see now.

At the time we talked about the different shelter types – basic overnight and housing-focused – essentially all of our state-funded shelters were housing focused, with Egan and motel vouchers being our only "basic" programs. Now with this biennium's funds, I think nearly all of our Emergency Shelter programs are actually going to fit in the Basic Overnight category. Is it possible to expand what the HMIS project types could be set up for Basic Overnight shelters to accommodate both ES-Night-by-Night and ES-Entry Exit? Switching to the NBN project type is a big lift (it requires ending all current projects and starting new ones) and also not a great fit given how we have traditionally used those project types.

Let me know what you think – also happy to meet and talk more!

Thanks,
Carly Walker

Sent: October 16, 2025
To: danielle.bautista-sylten@hcs.oregon.gov
Subject: RE: Proposed Rulemaking: Statewide Shelter Program

Thank you! Yes I was hoping this could be included in the public comment process.

At this point I believe all of our Entry Exit type shelters will be accessible day and night (the first point). The other two are not likely given current funding. Of course we are hopeful we can find a way to provide those services but it is not possible with the allocation we got this year.

Thanks,
Carly Walker

2. Email Received

Sent: October 21, 2025
To: HCS_DL_HCS_Rules_Team@hcs.oregon.gov
Subject: Statewide Shelter Program - Clatsop County's Comments on Proposed Rules

Hello,

Attached are Clatsop County's comments on the proposed rules establishing standards and procedures for administration of the Statewide Shelter Program.

Thank you for the opportunity to provide input.

Best regards,

Amanda Rapinchuk (she/her)
Management/Policy Analyst
Clatsop County Manager's Office

Attachment:

EXECUTIVE SUMMARY

Clatsop County appreciates OHCS' efforts to implement House Bill 3644 and establish a sustainable statewide shelter system that meets the diverse needs of communities across Oregon. State funds from the previous biennium enabled our community to open 80 new shelter beds

and rehouse over two hundred households, making a measurable impact in addressing homelessness locally.

As a small rural county with the highest per capita homelessness rate in Oregon for multiple years, Clatsop County faces distinct operational and funding challenges. Limited local resources, a small tax base, and fewer opportunities to leverage supplemental funding sources place rural counties at a structural disadvantage compared with larger urban counties.

Given these realities, it is essential that the proposed rules reflect the operational and financial capacities of both rural and urban communities. This document identifies areas where targeted adjustments would support more effective and equitable implementation statewide. Key areas include:

Administrative Burden: New reporting and coordination requirements add pressure on already resource-limited agencies, highlighting a potential gap between state expectations and the operational realities of local implementation.

Urban-Focused Funding Formula: The proposed funding formula's metrics favor larger urban areas, leaving rural counties like Clatsop with proportionally less funding relative to actual need.

Timely Communication: The proposed rules do not clearly establish expectations for OHCS to provide timely responses to Regional Coordinator inquiries, which can create uncertainty and slow local program implementation.

Regional Coordination: Ambiguity in the roles of OHCS, Regional Coordinators, and providers may complicate regional collaboration and encourage individual providers to bypass regional guidance. Selection of coordinators without established local relationships could also stretch resources and weaken regional collaboration.

Scope of the Grievance Process: Lack of clarity around the scope of the grievance process and the authority of participants at each stage may allow individual providers to challenge regional plans rather than just implementation, potentially undermining locally developed decisions.

ADMINISTRATIVE BURDEN

Rural providers in Clatsop County operate with limited resources. The proposed rules introduce new reporting and coordination requirements at a time when state funding for local service provision has decreased compared to the previous biennium. While we recognize that these requirements are intended to strengthen program accountability and consistency, the combination of increased administrative expectations and reduced funding creates additional strain on smaller providers as they work to meet program requirements while continuing to deliver essential services.

For small counties and organizations, these administrative expectations carry greater impact. Limited staffing often means that administrative tasks fall to senior leadership who are also responsible for high- level program management. When senior staff must complete time-intensive administrative work, overall costs increase and less time is available for strategic oversight and service delivery. Without dedicated administrative staff, providers must balance tracking performance metrics, participating in regional meetings, and coordinating with multiple entities, all while maintaining direct client services. Larger jurisdictions are typically able to assign these responsibilities to staff whose roles more closely align with administrative functions, giving them greater flexibility to meet program requirements.

Clatsop County's experience, which closely mirrors the role of a Regional Coordinator, further illustrates this challenge. Even when administrative funding is available, it is often shared among multiple providers. Although the proposed rules allow up to 15 percent of total funding to support administrative tasks, that amount must be distributed across all regional partners, limiting how much each organization can dedicate to administrative costs and diminishing the intended benefit of this allowance.

The Regional Coordinator application process that OHCS recently presented for feedback also represents a significant increase in workload. Completing the application as currently structured will require substantial staff time and attention, compounding the administrative responsibilities already anticipated under the proposed rules. Both the detailed nature of the application and the timeline for completion amplify the challenge for

small counties, further limiting capacity for regional coordination and program implementation.

While the Legislature approved increased funding for OHCS to support program implementation this biennium, funding for local service provision decreased compared with the previous biennium. The proposed rules do not reflect this shift in resource allocation and appear to assign additional administrative responsibilities to Regional Coordinators and service providers without aligning expectations with available resources.

To ensure successful program implementation, it is important to carefully assess all potential direct and indirect administrative tasks associated with each program requirement before they become official mandates. Each requirement should clearly support effective and fiscally responsible resource allocation, and all parties (OHCS, Regional Coordinators, and providers) should share an understanding of how these tasks contribute to effective service delivery. The cumulative impact of numerous small administrative requirements should also be considered, as they can collectively impose a substantial burden if not narrowed to a feasible and essential set of program expectations.

Recommendation: Reduce administrative burden by streamlining reporting and coordination requirements, particularly in consideration of capacity limitations for smaller organizations, to ensure program expectations are feasible.

Specific areas of consideration:

Regional Coordinator Application Process

Proposed Change: Establish a streamlined application process for agencies that served in regional coordination roles during the 2023–25 biennium. Reduce application requirements for returning agencies, focusing on OHCS' evaluation of each region's demonstrated ability to meet program expectations under existing leadership. Allow agencies currently performing these functions to use administrative funds to offset the costs of preparing and submitting the application.

Reasoning: The new 19-page Request for Applications, multi-step evaluation process, and Oregon Buys submission requirements impose significant administrative costs and complexity. These requirements

disproportionately affect smaller agencies with limited capacity and potentially discouraging qualified applicants who have demonstrated success during 2023-25. The new process requires applicants to learn unfamiliar systems, conduct outreach, and prepare extensive documentation without compensation, regardless of their size, mission, or proven track record. Simplifying the process reduces unnecessary administrative burden while maintaining accountability and program quality.

Creation of Regional Plan

Proposed Change: Simplify Regional Plan requirements by reducing duplicative planning tasks and allowing regions to build on their existing 2023–25 plans. Align the new Regional Plan Template with prior structures and outcomes from the previous biennium and ensure the plan serves as the foundation for program decisions and funding allocations rather than a stand-alone exercise.

Reasoning: The current seven-page template treats the SSP as a new initiative, disregarding prior work. In 2023–25, OHCS made funding and outcome decisions that sometimes conflicted with submitted regional plans, undermining collaborative planning and creating inequities. Building on existing plans reduces redundant work, preserves staff capacity, and supports consistent, accountable implementation.

Regional Plan Requirement: No Net Loss of Shelter Beds

Proposed Change: Revise the "no net loss of shelter beds" requirement for 2025-27 to align with current funding levels, allowing regions to maintain prior bed counts where feasible while demonstrating proportional service maintenance relative to available resources.

Reasoning: Expecting regions to sustain previous bed counts under reduced funding and increased administrative demands is unrealistic. This requirement disproportionately impacts rural areas with limited fiscal capacity and undermines the feasibility of equitable statewide implementation.

Regional Plan Requirement: Integration With Rehousing, Behavioral Health, and Medicaid

Proposed Change: Adjust integration requirements to reflect the funding and program stability currently available. Allow regions to set achievable integration goals based on confirmed resources rather than requiring full integration across underfunded or uncertain programs.

Reasoning: Local providers maintain strong partnerships for integrated services, but recent reductions in rehousing funding and uncertainty in Medicaid and behavioral health resources make full integration difficult. Holding regions accountable for outcomes tied to underfunded programs effectively shifts the burden of federal or state funding gaps onto local providers.

Contracting, Reimbursement, and Reporting Requirements

Proposed Change: Establish a clear, predictable schedule and process for all contracting, reimbursement, and reporting requirements, including one-time or additional data requests. Limit requests to tasks that cannot reasonably be completed by OHCS staff, and communicate expectations, processes, and timelines in advance, aligned with local agency capacity. For urgent or unexpected requests, OHCS should assess and implement procedural improvements to prevent similar situations in the future.

Reasoning: In the past, OHCS issued multiple unexpected, time-sensitive requests for data reorganization that agencies had already provided, creating unnecessary administrative burden. A structured, predictable process reduces last-minute demands, prevents duplication of work, and allows agencies to allocate staff time efficiently while maintaining accountability and program quality. Clear procedures for urgent requests also help agencies respond effectively and support OHCS in improving its processes.

URBAN-FOCUSED FUNDING FORMULA

The proposed funding formula relies heavily on metrics such as the number of existing shelter beds, housing availability, prior program performance, and Point-in-Time (PIT) counts. While these factors may be appropriate for assessing funding needs in urban counties with larger

infrastructure, they create inherent disadvantages for rural areas like Clatsop County.

Rural counties often face limited shelter capacity, fewer housing options, service providers with smaller organizational capacity, and challenges in accurately conducting PIT counts. Geographic dispersion and limited staff or volunteers make tracking homelessness difficult. While Clatsop County's homelessness rate is high, these constraints can lead to underreported PIT counts, meaning the actual number of people experiencing homelessness may exceed reported figures. Smaller providers may also face challenges demonstrating performance metrics that are less suited to rural program operations, even when delivering effective outcomes.

As a result, rural counties may receive less funding relative to actual need, even when homelessness per capita is significant. Although local agencies work diligently to track PIT counts and manage program performance, these metrics do not fully capture the operational realities and constraints of rural service delivery.

Recommendation: Establish a base allocation that accounts for fixed operating costs such as insurance, utilities, and staff wages, recognizing that these expenses often represent a larger share of total costs for rural providers. Modify the remaining funding formula to better reflect the realities of rural communities, including limited shelter beds, housing availability, organizational capacity, and challenges in collecting accurate PIT data, ensuring that allocations are equitable and aligned with actual local need rather than metrics designed for larger urban programs.

TIMELY COMMUNICATION

As written, the proposed rules lack clear expectations for OHCS communication with Regional Coordinators. Clatsop County is concerned that without such guidance, uncertainty may persist regarding how Regional Coordinators should proceed if timely responses from OHCS are delayed.

During the 2023-25 biennium, OHCS issued several unexpected, time-sensitive requests of agencies. Clatsop County prioritized meeting these requests, recognizing the importance of supporting the state's efforts to

achieve program goals. In several instances, however, when the County sought clarification or guidance from OHCS on similarly urgent matters, responses from OHCS were delayed and required repeated follow-up. The County understands that implementing a complex statewide program presents significant challenges that may have contributed to these circumstances. That said, these experiences highlight an opportunity to strengthen communication systems and ensure timely coordination that supports both state and local implementation.

These communication gaps have had tangible impacts, slowing operational processes such as payments and contract finalization. For example, the County did not receive its finalized contract for this biennium until nearly four months into implementation. Without clear expectations for timely responses, OHCS staff may lack the guidance or framework needed to effectively support Regional Coordinators.

Recommendation: Establish clear expectations for timely responses from OHCS to Regional Coordinator inquiries, including procedures that help Regional Coordinators continue implementation if responses or guidance from OHCS are delayed.

REGIONAL COORDINATION

Strong regional coordination is essential for effective shelter program implementation. Rural regions, in particular, require flexibility to tailor strategies to local conditions and provider dynamics. However, the proposed rules limit local control by creating ambiguity in the respective roles of OHCS, Regional Coordinators, and individual providers.

Without clearly defined roles, providers may interpret the coordination structure differently, at times resulting in parallel communication or inconsistent implementation approaches. This ambiguity can inadvertently foster competition among providers or lead them to engage directly with OHCS when they disagree with regional guidance, rather than collaborating to address shared regional priorities. Such dynamics can undermine the ability of Regional Coordinators to guide strategic decisions that balance community needs across multiple providers.

Clatsop County is also concerned that the Regional Coordinator application process may not adequately prioritize applicants with established local connections and experience performing regional coordination functions. There appears to be a risk that nonprofit agencies applying to serve a larger combined region could score higher, even if they lack direct relationships with all providers in counties that are currently operating separate systems. Without explicit consideration of local knowledge, existing partnerships and regional shelter coordination experience, the process may lead to coordinators who are less connected to community needs and local providers. This may also result in limited resources being spread even thinner across the regions they serve.

Recommendation: Strengthen regional coordination to ensure effective shelter program implementation by clarifying roles to support local collaboration and prioritizing applicants with relevant experience and local knowledge.

Specific areas of consideration:

Role of Regional Coordinators

Proposed Change: Preserve and reinforce the role of Regional Coordinators as the central point of contact and decision-making lead for regional implementation. Direct engagement between OHCS and providers should occur only through the established grievance process.

Reasoning: A clearly defined leadership role supports accountability, reduces conflicting guidance, and ensures that regional planning decisions reflect collective community needs.

Regional Coordinator Application Process

Proposed Change: Give priority in the application process to agencies with demonstrated regional coordination experience during the 2023–25 biennium and established connections with local providers. These agencies should be advanced directly to the second phase of the application process. Additionally, letters of support from a majority of jurisdictions within the proposed region should be weighted in evaluating applicants.

Reasoning: Recognizing prior experience and existing relationships ensures continuity, strengthens local collaboration, and reduces the risk of selecting coordinators who are less connected to community-specific needs. Weighting letters of support ensures that selected coordinators are positioned to effectively facilitate regional planning and implementation.

SCOPE OF THE GRIEVANCE PROCESS

The proposed rules do not clearly define the scope of the grievance process or the authority of participants at each stage. This creates uncertainty about when and how it is appropriate for OHCS to intervene in regional matters. Current language suggests that grievances could relate not only to implementation of regional plans but also to their content and expectations, raising concern that OHCS could be asked to intervene at the request of a single provider, potentially overriding decisions reached collaboratively by regional partners.

This lack of clarity could compromise the planning authority of Regional Coordinators and leave providers without a clear, consistent mechanism for raising legitimate implementation concerns.

Recommendation: Clearly define the scope of the grievance process and the authority of participants at each stage. The process should resolve implementation disputes without revisiting regional decisions reached collaboratively. OHCS' role should focus on facilitating resolution and maintaining consistency, rather than re-evaluating or overturning regional decisions.

CONCLUSION

Clatsop County values OHCS' efforts to develop a statewide shelter program that builds on the progress made under the Governor's executive order on emergency shelter response. As the program transitions to a permanent framework, long-term success will depend on ensuring that implementation requirements, funding structures, and communication processes work effectively for counties of all sizes.

By streamlining administrative requirements, refining the funding formula to better reflect demonstrated need, establishing clear timelines for communication, strengthening regional coordination, and clarifying the grievance process, OHCS can create a program that balances statewide

consistency with local flexibility. These adjustments will help ensure that both rural and urban communities have the capacity and resources to provide sustainable, equitable, and effective shelter services for all Oregonians.

3. Email Received

Sent: October 27, 2025
To: rachel.bennett@hcs.oregon.gov
Subject: Additional Comments Regarding Proposed SSP

Ms. Bennett:

I am sending this email as Director of Shepherd's House Redmond Center, a 24/7 shelter and services center that was initiated and has been sustained since 2023 by the Governor's emergency orders for funding and subsequent legislation. Shepherd's House is grateful to the State of Oregon for its valuable partnership in SH Redmond and other SH service locations that serve the neediest of Central Oregon. This partnership has advanced the breadth and depth of shelter services a great deal beyond what it was previously.

Additionally, I am on the Executive Board of the Multi-Action Cooperative group which has distributed funding to shelters in the Central Oregon region. I am also the Vice-Chair of the Board for the Central Oregon Continuum of Care. I have been involved in low-barrier shelter, at the level of client engagement in Central Oregon, for over 10 years.

At the October 15 hearing for pubic comment, I made three general comments:

1-- It is important that shelter providers be diligent in seeking available sources of funding. When a shelter provider diligently obtains diverse funding, however, an ironic result is impediment and distraction from the work that is often encountered in trying to meet the different and often conflicting requirements of diverse funding.

2--The main goal of low barrier shelter is to rescue the unsheltered from the life threats and debilitating conditions that prevail in unsheltered life. Providing immediate shelter is a part of this. Equally important is having latitude in how to connect with shelter guests so they will advance more deeply into services beyond shelter and meals. This is the key to a shelter

system's success in supporting habilitation and housing. Low-barrier shelters need the freedom and means to apply a full toolkit.

3—Whatever form the SSP takes, and whatever guidelines it employs, the system will be more effective if it is a living organism of communication and adaptation. There must be responsive, real-time communication between the system and the service providers who are experiencing first-hand the served population. This must occur in a way that keeps pace with the volatility of the homelessness situation.

In addition to these three general comments, I would like to comment specifically as follows:

1-- I very much appreciate the use of the word "holistic" at the start of the "Administration" proposed changes. A holistic perspective is needed both in offering effective services to the population and just as much in healing each individual afflicted with homelessness.

2-- Case management is a key element of a holistic approach. I agree that low-barrier walk-in shelters, especially overnight emergency shelters, should not have formal case management obligations. Such requirements would be burdensome and impractical given the volatility of low-barrier, walk-in guests. However, if a shelter is 24/7 and has constant access because of that, the opportunity to apply flexible, ad hoc case management services (to persons we are experiencing day after day) is an effective way to connect with what the guests really need. I believe SH Redmond has success in positive transitions because we can have very regular access to those we serve but are not required to observe formalities when they do not practically advance the client's situation. The opportunity and willingness to use this type of case management should be encouraged within the system.

3--Exits are a different animal in low-barrier, walk-in shelters than in more formal transitional or housing programs. Ideally, exits at SH Redmond are to transitional or housing destinations that are further along the continuum of care. These types of transitions do occur with some regularity. However, many exits from SH Redmond are a cycle of unannounced, voluntary exits and returns, and some are involuntary exits through separation or legal trespass. Most of the involuntary exits will eventually conclude with restoration to services. Thus, the frequency of exit and return is much higher than in the more formal programs above. What is important is that these processes establish and deepen connection with the population we are serving. The willingness to restore someone to services especially improves trust and

appreciation. Thus, exits can actually become an important part of the process of positive transition, as they can lead to changes in how later work progresses. In our experience, even separations or legal trespasses have been an important step in this way, as they can motivate a realization that significant change is needed.

4--Grievances are important for empowering shelter guests to self-advocate and seek redress when services have been wrongly denied. The existence of the process signals a willingness to provide a meaningful voice. We have employed the grievance process at SH Redmond, which includes informing guests of how it is available at their intake session. What we have seen so far:

    --The existence of a grievance process has the positive effect of motivating care and sensitivity in applying guidelines for separation.

    --Guests tend to use grievances to change service guidelines (e.g., make coffee more often) or for complaints about other guests. Such grievances can lead to constructive conversations, however it is difficult to render objective resolution through a grievance process.

    --The subject matter of some grievances are better suited for our reasonable accommodation process, and need to be redirected.

    --There is some experience with the attempt to use grievances to try to intimidate or otherwise target staff who are firm in holding guidelines or thought to be "easy targets." Staff become concerned that they will then be unfairly judged by someone unfamiliar with the first-hand facts.

    --There are guests who initially submit a grievance then decline to participate in the process, or who are thought to be under the influence during the grievance process.

Overall, I would say that resolution of grievances in low-barrier shelter is less susceptible to objective criteria than, say, whether a housing applicant meets rental criteria. That reality needs to be acknowledged in how the process is applied. I also believe that continued experience with the process will allow positive education on what is effective, for both shelter providers and guests.

One last general comment: While each shelter project needs to be evaluated individually, each continuum of care needs a careful, first-hand assessment of what type of shelter combination will best serve the region's needs. Such assessment should include where shelters are situated, what characteristics of the population are served and how the number of shelter beds are distributed throughout the continuum. This will serve the vital goals of reducing

homelessness, reducing unsheltered homelessness and humanely situating those who will not in their lifetime escape some impact from their lived experience.

Thank you for letting me share my experiences, observations and comments. Please feel free to contact me if you have questions or need further information.

John Lodise
Director, Shepherd's House Redmond
Shepherd's House Ministries

4. Email Received

Sent: October 29, 2025
To: rachel.bennett@hcs.oregon.gov
Subject: Comment on Proposed Rulemaking: Statewide Shelter Program

Greetings,

I am the executive director of Unity Shelter, an Oregon non-profit organization providing emergency shelter and transitional housing in Corvallis, OR. Unity Shelter is the only low-barrier provider in our community, with 100 beds of low-barrier shelter and 64 beds of transitional housing provided through microshelters and hotel support. I'm writing to provide comments on the proposed rulemaking as represented in the Statewide Shelter Program Operations Manual. At a general level, there's no one item that makes me think that our organization will not be able to meet the requirements. However, there are a number of points that will force development of new documents, updates to policy and procedure, and possibly staff realignment or hiring to support the increased level of reporting. One of my broader concerns is that many smaller organizations may struggle to meet these requirements immediately, and a phase in period may be advised. More specific comments are below.

- Data, Forms and Records: The requirements outlined in the manual will require an increased level of documentation in HMIS and/or other systems, as well as work to ensure ongoing compliance. This creates a workload beyond the data work we have previously supported, and will require more staff time and changes in some processes which will take time and resources which are in short supply. The IT systems requirements

and documentation requirements are reasonable, but again will require some more rigor to ensure compliance. See page 6, 9, 19 for some examples of items that will change our efforts.

- Policy and Process: There are many policy and process implications for our organization. Some of this is more about documenting policies and processes we have now, but there are new requirements as well, particularly around how we exit people and communicate the rules, and what appeals are available regarding these decisions. Provision of written notices for cause of shelter exit or other service restriction is something that makes sense in the abstract, but can be challenging in the midst of a crisis that threatens safety of other shelter guests, staff or volunteers. If the cause document does not have to be provided concurrent with the exit, that would help. Similar comment on an appeals process. Appeals processes have to allow for some timeframe, as often people who are exited may not return for days, especially if there was some conflict with another shelter guest that initiated the exit, so follow up may be difficult.
- Allowable Costs and Programs: The allowable costs outlined in the manual, and related requirements of operations are very helpful to see. No particular concerns here – just appreciation for the thoughtful approach to allowable costs.
- Regional Coordinator (RC) costs and authority: The Regional Coordinator roles that are outlined here raise two concerns. 1) The structure proposed which grants the RC both large authority and large responsibilities for monitoring and managing subgrantee compliance and reporting may be underfunded. This would depend on the size of the RC's region and future allocations to the region, as costs are limited to 15%. 2) Given that some areas may not have a qualified applicant for an RC, and the limitations of the costs for the RC that can be allowed, it seems likely that some RC applicants which have never worked in a region will apply to build a bigger base for their region. The concern here is the potential for a loss of local engagement and accountability if, for example, an RC with more substantial resources in a larger existing region proposes managing multiple other areas as part of their region, but don't have any existing experience or relationships with providers/subgrantees and electeds in an area. They may have the organizational qualifications to operate a large diverse region, but may not have the contacts with community members and stakeholders to understand the real needs and challenges. Without

that local engagement, there may be no check on an RC redirecting resources to more subgrantees in their "original" regional footprint.

Thank you for the opportunity to comment.

Shawn M Collins
Executive Director
Unity Shelter, Inc.

5. Email Received

Sent: October 29, 2025
To: rachel.bennett@hcs.oregon.gov
Subject: Opportunity to Provide Feedback on SSP

Good afternoon Rachel,
I am the Executive Director of Redmond Oasis Village Project. We are a low-barrier shelter in Redmond that opened in 2024 with the support of EO funding. I have been working with our Partners at COIC regarding our new COIC-SSP/Phase 1 contract, and appreciate the opportunity to share with you some feedback that has come up from our Board and Team.

I am very proud to say that Oasis Village is already operating under most all of the eligibility requirements for low-barrier shelters listed in our contract. The biggest point of confusion is the definition of low-barrier itself. Some interpret low barrier as removing barriers to <u>access</u> shelter. Others define low-barrier in the ways in which a shelter works with Participants <u>after</u> they come into shelter. Some may see it as both. If the state wishes to design a "low-barrier program" or service model; it is crucial that more input from shelters is provided and that we are given more clarity about what level of autonomy we have under the requirements. The term "participation" also needs more clarity. At Oasis Village, participation is very important because it is part of safety, engagement, personal responsibility and relationship building. Loosely defining participation, but then mandating it is "not required for client eligibility to stay in shelter" could unintentionally put shelter operators in the position of renegotiating their boundaries for the sake of funding compliance. I understand the intention and feel confident that we would never exit someone without multiple attempts to help, engage, support and above all keep them safe. And, I am a strong

advocate that when individuals choose to enter a shelter, they are choosing to follow the rules, take care of our property, communicate with us and practice safe behaviors at a minimum. We define this as participation. Lastly, "Case Management" also needs to be defined. The only guidance we had under the original EO was the directive that we could not require Participants to participate in "formal case management" for the first 90 days. I believe that even amongst service providers in Redmond, we define Case Management differently. Other services such as Mentoring, Advocacy or Navigation might look similar to Case Management. My feedback is that the state defines Case Management and the specific components of that service so that we can be aligned in what we do and do not do within Case Management. While it may feel like semantics or splitting hairs, these eligibility requirements are going to heavily impact our services and I want to ensure we are very clear so that we can be not only in compliance with our contract, but providing impactful high quality services.

Oasis Village would not be open and serving people every day if it were not for funding through OHCS/COIC. We are very grateful to be standing up these services in Redmond with your support. Feel free to reach out to me if you have any need for clarity or further explanation. Thank you for your time.

Josie Anders-Mize
Executive Director
Oasis Village

6. Email Received

Sent: October 29, 2025
To: rachel.bennett@hcs.oregon.gov
Subject: Multnomah County SSP Rulemaking Feedback

Hello Rachel,

Please see attached feedback from Multnomah County for the SSP guidance and rules.

Thank you,
Terri

Terri Hsieh
Special Initiatives Program Specialist Senior
Homeless Services Department
Multnomah County

Attachment:

Multnomah County: HB 3644 Statewide Shelter Program, Rulemaking Feedback

- Related to "Allowable Program Components and Costs," pages 28-38: Multnomah County recommends that the Statewide Shelter Program Rules add a clause that allows local regions/governments to align client assistance guidance execution with existing funding. This would minimize barriers for clients who access multiple types of shelter (with different funding sources) within a region.
- Related to "Allowable Program Components and Costs, pages 28-38: Multnomah County recommends that the eligible expense categories be adjusted to include more flexible spending and align with current local initiatives. Spending that is misaligned will cause more burden on sub-grantees and reporting. Multnomah County identified the following example:
  - Multnomah County recommends allowing over-the-counter (OTC) medicine as an eligible expense for street outreach teams. OTC medications are not eligible under medical insurance, but can be critical depending on individual circumstances and life events.
- Related to "Budget Change Requests," pages 42-43: Multnomah County recommends adding an additional clause to introduce flexibility in moving funds between lines. For example:
  - Moving money from STEP or shelter operations to housing-focused activities. The beginning of the fiscal year might incur greater shelter operation costs beyond the percentages set at the beginning of a fiscal year. Housing-focused activities, case management, and affiliated staffing costs are crucial to reducing client barriers and working with clients throughout the housing continuum.
  - If a region requires more than 50% to shelter operations, they should be able to reallocate the funding throughout the grant period to assist with shelter funding from other lines.

- Related to "Oregon Residency," pages 32-33: Multnomah County recommends clarifying which funding categories can support portability and out-of-region/out-of-state costs, since there are existing restrictions.
- Related to "Definitions," pages 58-60: Multnomah County recommends adding a definition of "recovery-focused" and more detail to the definition of "low barrier." The distinction between 30% needing to be recovery focused and low barrier while the remaining 70% ONLY being low barrier would benefit from clarification.

7. Email Received

Sent: October 29, 2025
To: rachel.bennett@hcs.oregon.gov
Subject: Public Comment – Statewide Shelter Program Rules (Central Oregon Youth Shelter Perspective)

Dear OHCS Rulemaking Team,

Thank you for the opportunity to provide feedback on the proposed rules for the Statewide Shelter Program (SSP) and the implementation of House Bill 3644 establishing the regional coordinator model.

As a Central Oregon provider serving runaway and homeless youth, I appreciate OHCS's continued investment in statewide shelter capacity and the intent to create greater consistency and coordination across regions. I would like to share several considerations to ensure this framework maintains flexibility for local innovation and responsiveness.

- Preserve Local Adaptability within the Regional Model
  - Central Oregon has unique geographic and demographic characteristics that differ from larger urban regions. Under the current CoC framework, local partners have been able to adapt certain rules and program practices to meet the nuanced needs of rural and frontier youth.
  - We encourage OHCS to design SSP rules that preserve space for localized program adjustments and community-driven CQI

(Continuous Quality Improvement). This flexibility has been essential to developing culturally responsive, trauma-informed, and developmentally appropriate shelter services for youth.

- Clarify the Role and Accountability of Regional Coordinators
  - o While regional coordination would ideally enhance communication and reduce duplication, the new model may also distance decision-making from local providers who best understand community conditions.
  - o We recommend clear definitions of:
    - The scope of authority for regional coordinators versus local providers.
    - Accountability mechanisms to ensure regional decisions align with locally identified needs and data.
    - Opportunities for providers and youth voices to participate in ongoing regional planning and CQI cycles.
- Protect Youth-Specific Capacity and Funding Streams
  - o Youth shelter beds are a small but critical portion of total statewide shelter capacity. As SSP funding is consolidated regionally, it is vital that youth beds remain protected and not absorbed into broader adult or family shelter priorities.
  - o Rules should require regions to track and report youth-specific outcomes, maintain dedicated youth allocations, and include youth-serving providers in governance decisions.
- Strengthen Data and Feedback Loops
  - o To achieve the SSP's goals, OHCS should establish standardized data measures that capture both quantitative (e.g., exits to stable housing) and qualitative (e.g., youth wellbeing, connection to supportive adults) outcomes. This would allow continuous quality improvement without over-burdening providers.

We support the overall vision of a coordinated statewide system but urge that local flexibility, youth-specific prioritization, and clear accountability remain foundational as these rules are finalized.

Thank you for considering these comments and for your partnership in ensuring Oregon's youth and families receive equitable and effective shelter support.

Sincerely,

Andrew Scott
Director of Residential Services
J Bar J Youth Services

8. Email Received

Sent: October 29, 2025
To: rachel.bennett@hcs.oregon.gov
Subject: Statewide Shelter Program Ops Manual Feedback - 9/30/25 Version

Hi Rachel,

Below are a few additional points of feedback regarding the Statewide Shelter Program standards and procedures.
Please let me know if you have any questions.

Page 35 i6 Requirements for Street outreach
- Efforts to obtain these consumable supplies outside of using state funds must be documented and such document must be available to OHCS, upon request, or the grantee/subgrantee must be able to articulate appropriate measures taken that align with OHCS' intent identified in this manual.
  - The ask to document efforts to obtain consumable supplies is unrealistic and burdensome. Delete that section and only include the second half …
    - Grantee/subgrantee must be able to articulate appropriate efforts/measures taken that align with OHCS' intent identified in this manual to obtain these consumable supplies outside of using state funds.

Page 36 cii 1: Allowable Costs for Housing Focused Activities include:
- Include pet and other fees legal in Oregon

Page 38 di 1: Requirement for Shelter Operations
- At least 50% of the total SSP award must be used for shelter operations.
  - This requirement reduces the flexibility of the funding to allow regions and individual shelters to meet their unique needs. For example, a shelter may just need housing focused activity funding and not operations due to a diversity of funding.

- o I presume the purpose of this requirement is to prioritize the maintenance of shelter beds currently funded with Statewide Shelter Program funding. Can this be stated instead?

Pages 43-45 a Financial Management Fiscal Standards

- This reads as a list of do's and don't's from a bad monitoring visit. This is not appropriate in a program manual and instead policies should be specified and the tips can be shared independently. At the very least change all tips to positive statements.
  - o Working with Regional Coordinators who have experience and knowledge with accounting and 2CFR200 should also alleviate the need for this information.

Page 47 e Budget Change Request

- Using mga.fiscal@hcs.oregon.gov is misleading because many of the regional coordinators are not receiving shelter funding through a master grant agreement.
- Can a different e-mail be developed?…. budgetchangerequest@hcs.oregon.gov

Kate Budd
Human Services Division Manager
Lane County Human Services Division

9. Email Received

Sent: October 29, 2025
To: rachel.bennett@hcs.oregon.gov
Subject: Public Comment on Rulemaking for HB 3644

Hello Ms. Bennett,

Thank you for the opportunity to make public comment on the Rulemaking for HB 3644. Attached you will find our comments.

Nicole Merritt
Director of Public Contracts
Shepherd's House Ministries

Attachment:

Dear OHCS Rulemaking Team,

As the Director of Operations of a small rural nonprofit shelter serving Central Oregon, I want to first thank OHCS and the State of Oregon for recognizing the urgent need for sustainable shelter services through HB 3644. Our organization has benefited from state partnership and appreciates the intent of the legislation to create a coordinated, equitable, and accountable statewide shelter system.

However, I would like to express several concerns from the perspective of small, rural, community-based shelter providers, and to offer constructive recommendations that I believe would strengthen implementation of this legislation while ensuring that vital rural shelter capacity is not unintentionally diminished.

1. Metrics of Success Should Reflect Stabilization, Not Only Housing Transitions

The current emphasis on "transitions to housing" as the primary success metric poses a significant challenge for rural shelters. In many rural regions, affordable or subsidized housing is scarce or unavailable, regardless of a shelter guest's readiness or engagement in services.
Measuring performance primarily by housing outcomes risks misrepresenting the effectiveness of shelters that are stabilizing individuals who might otherwise face life-threatening conditions in unsheltered environments.

Recommendation:
Include additional metrics that value stabilization, engagement, and progress toward housing readiness—such as:
- Number of individuals safely sheltered and stabilized over time.
- Increases in engagement with case management or support services.
- Reductions in unsheltered homelessness within a service area.
Such measures more accurately reflect the work of rural shelters that must operate amid limited housing stock but still provide critical, life-saving stabilization and connection to services.

2. Avoid One-Size-Fits-All Operational Mandates

Rural shelters often operate on lean budgets, with facilities adapted to local conditions and community needs. Mandating uniform operational standards such as facility types, staffing ratios, or service menus without allowing for local flexibility could force small shelters to scale back or close due to costs or logistical infeasibility.

Recommendation:

Incorporate flexibility in implementation by allowing rural shelters to meet intent-based standards rather than rigid operational mandates. For example, define minimum service expectations as "appropriate to local capacity and community context" rather than fixed requirements.

3. Administrative Burden and Reporting Requirements

The proposed reporting and data compliance expectations, while understandable for transparency, will likely create significant administrative burden for small rural providers. Many of us operate with limited administrative staff and already balance complex reporting across multiple funding sources.

If compliance obligations increase without additional funding for administrative capacity, this could divert resources from direct service delivery to paperwork, undermining the core mission.

Recommendation:

- Scale reporting requirements to organizational size and capacity.
- Provide technical assistance or shared data entry support through regional coordinators.
- Allow simplified reporting for smaller organizations that meet key outcomes but lack large administrative infrastructure.

4. Funding Formula and Regional Equity

There is concern that the funding formula and regional coordination model could unintentionally favor larger, urban regions with higher populations and more administrative infrastructure. This could leave smaller, rural regions underfunded even when homelessness rates per capita are high and service gaps severe.

Recommendation:
- Incorporate rural weighting factors in the funding formula to account for geography, weather severity, and lack of nearby services.
- Require regional coordinators to demonstrate equitable inclusion of small and rural providers in planning and funding allocation.

5. Mission Integrity and Flexibility

Small nonprofit shelters often serve as both crisis response and community stabilization hubs. Overly prescriptive regulations could unintentionally shift the mission and operational flexibility that make community-based shelters effective. The unique relationships, trust, and local responsiveness that define rural service delivery must be preserved.

Recommendation:
Ensure that the final rules explicitly allow shelters to maintain mission-aligned flexibility, especially around low-barrier operations, guest engagement, and the use of informal or ad hoc case management approaches that are proven effective in small community settings.

In summary, I appreciate the State's commitment to expanding shelter systems across Oregon. However, successful implementation will require flexibility, proportionality, and recognition of the realities faced by small rural providers.

A shelter system that measures stabilization as well as housing transitions, that allows locally adapted practices, and that funds administrative capacity fairly across regions will better serve the diverse needs of Oregonians experiencing homelessness.

Thank you for the opportunity to share these comments. Please feel free to contact me if you would like to discuss the rural shelter perspective in greater detail.

Respectfully submitted,

Curt Floski

Chief Executive Officer
Shepherd's House Ministries

Nicole Merritt
Director of Public Contracts
Shepherd's House Ministries

10. Email Received

Sent: October 29, 2025
To: HCS_DL_HCS_Rules_Team@hcs.oregon.gov; rachel.bennett@hcs.oregon.gov
Subject: Public comment on Statewide Shelter Program rules

Please accept the attached as public comment from City of Eugene and local shelter providers on the rules establishing standards and procedures for administration of the Statewide Shelter Program.

Michael Kinnison
Homeless Services Analyst
Community Development Division

Attachment:

Oregon Housing & Community Services,

As partner agencies collaborating to deliver stable, effective and outcome-oriented shelter services in Eugene and Lane County, we would like to provide the following comments on the drafted administrative rules that are being adopted for the Statewide Shelter Program (SSP).

- Administrative Costs – p52 of the packet/p47 of the manual currently reads: "Grantees can retain and use up to 15% of the SSP funds allocated to subgrantees, for the grantee's administrative costs."
  - This language is silent on subgrantee's ability to retain funds for administrative costs. We propose editing it in the following way: "Grantees can retain and use up to 15% of the SSP funds allocated to subgrantees, for the grantee's and subgrantees' administrative costs."

- Shelter providers are finding it increasingly difficult to cover their administrative costs as the allowable percentage dips below 15%. Cost increases are outpacing funding and exacerbated by additional state rules and requirements for shelter. We recommend increasing the ability to retain up to 20% of SSP funds, which would allow for regional coordinators to receive a share and provide subgrantees with enough to cover their actual administrative costs.
- The draft manual is confusing and inconsistent in the way it couples STEPS with Low-Barrier & Recovery-Based definitions. We believe this needs to be fixed in the document to avoid confusion.
  - For example, p26 of the packet/p21 of the manual specifically references STEPS in the definition of "recovery-based shelters." However, other locations such as the description of required conditions for a low-barrier site on p25 of the packet/p20 of the manual and requirements that STEPS follow low-barrier requirements included on p40 of the packet/p35 of the manual, are not consistent with this definition. STEPS needs to be primarily about habitability. Recovery based requirements are in opposition to the low barrier prioritization. It is our understanding that at least 70% of SSP-funded shelters and STEPS will need to meet low-barrier requirements. Therefore, STEPS should not be included in the definition of recovery-based shelter types.
- Training requirements
  - Sourcing the required trainings detailed on p21 of the packet/p15 of the manual, particularly at the regularity and rhythm prescribed, poses challenges for service providers, including adding significant costs. We recommend editing this language to be more general, such as "Staff must receive training and have a working knowledge of these principles and practices, and track staff training attendances." Alternatively, OHCS could specify how the agency or the grantee will be required to provide support and resources for meeting these requirements.
  - Mental Health First Aid is a very specific training type. We suggest broadening the language to include suicide prevention/ASIST and other relevant topics.
  - As this is a manual for shelter providers, we recommend that references to fair housing (included in the training section as well as the policy section on Nondiscrimination) be more clearly

connected to how fair housing applies to the provision of shelter. The Fair Housing webpage titled How Fair Housing Law applies to Transitional and Shelter Housing Providers is very useful for this.

- Low-Barrier Definition
  - p25 of the packet/p20 of the manual reads "Sobriety, treatment, and participation in case management services is voluntary." This statement in isolation can be confused by shelter providers to mean they cannot set reasonable expectations for people to engage with case management. The language around how shelters can balance housing-focused goals with low-barrier practices requires some finesse. We recommend removing "participation in case management services" from the above and rather adding to the Exit & Separation from Services section the following: "Lack of participation in case management cannot be grounds for involuntary exit."
  - pP25 of the packet/p20 of the manual lists conditions that must be met at low-barrier sites. It appears that #3 omitted the word "pets" from the second sentence. The exclusion of pets can be a significant barrier to someone seeking shelter and the manual should be clear that low barrier sites should accommodate pets if possible.
- Allowable Costs
  - On p41 of the packet/p36 of the manual, we recommend that the allowable costs for STEPS include additional items that are allowable for Shelters, such as data entry, pest management, transportation costs for participants, translation services, food, and furnishings.
  - We recommend including Shelter Units and Shelter Unit Replacement as well as any Permit Fees required for equipment or site upgrades as allowable costs for Shelter and STEPS Operations. Adding these as allowable expenses is crucial to the sustainability of our local shelter sites.
- Regional Coordination, Assessment & Plan Requirements, iii) Grievance System
  - P30 of the packet/25 of the manual reads, "No later than 30 business days after initial submission of the request for support, OHCS will provide a written support summary to relevant parties." We strongly support the option of a grievance process and

recommend adding to the end of that sentence the following: "…that includes a <u>recommendation</u> for resolving the dispute."

We appreciate OHCS's work on implementing the SSP and respectfully submit these comments to strengthen the drafted administrative rules and the ability of communities in the state to effectively operate shelter and support people transitioning out of homelessness into long-term stability. Thank you for your consideration.

11. Email Received

Sent: October 29, 2025
To: rachel.bennett@hcs.oregon.gov
Subject: AOC public comment on proposed statewide shelter program rule and manual

Dear Rachel,

Please accept the following comments, on behalf of county governments in their role as conveners and partners in local coordinated homelessness response, regarding the proposed rule and manual for the statewide shelter program. I am also attaching Clatsop County's memo as a supplement to the below. [removed; see Attachment to Email #1 above].

Needed changes and considerations for draft rule and draft program manual. Please:
1. Explicitly list data collection and reporting as an eligible use of funds
2. Set the expectation for state and local partners that the statewide shelter program requirements will take considerable time to achieve, both in capacity building and expertise (e.g. 24/7 operation) and ensure flexibility that allows regions and their providers in remote and under-resourced areas to participate in the program.
3. Clarify the obligation of the regional coordinator to enforce compliance of subgrantees
4. Provide acceptable sample policies and give organizations the opportunity to present alternative policies that meet the goal within the size and structure of the organizations.

5. Provide recorded online trainings to make compliance achievable for small and remote organizations

6. Insert side rails for the grievance and appeals process to keep it manageable for providers and the agency

7. The requirement for meals and showers onsite will eliminate local capacity that currently depends on community partnerships to make shelter in under-resourced communities possible

8. Regarding records access and disclosure of personal information: please ensure that every reporting requirement is congruent with federal confidentiality requirements and specifies that no PII will be shared outside of aggregate counts.

9. Organizational conflict of interest: some regions with low capacity may have no other carriers beyond the outreach awardee resulting in an inability to make referrals

10. Please define reasonable to avoid costly administrative burden.

11. Change "limit" to "prohibit" the use of drugs and alcohol in common or shared areas.

12. Heavy restrictions on requests for advance payments will put programs and the people they serve at risk, given the administrative delays that have historically occurred.

13. The 15% administrative rate is likely inadequate to cover the cost of the additional administrative workload on regional coordinators contained in the draft rule and manual. Please continually monitor to ensure the cap reflects the actual cost of these functions.

Warm regards,
Jessica

Jessica Pratt
Legislative Affairs Manager
Association of Oregon Counties