

OREGON HOUSING AND COMMUNITY SERVICES

Oregon Rehousing Initiative (ORI) Rules Advisory Committee



Jan. 13, 2026

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Process Agreements

- Seek common ground and understand divergence
- Share airtime
 - Ask yourself, ‘Why am I talking?’ or ‘Why am I *not* talking?’
- Active virtual participation
 - Use the chat or raise your hand
 - Respond to polls
 - Minimize multi-tasking
- Take care of yourself

Active Virtual Participation and Teams Logistics

- Please keep yourself muted when not talking
- Use the chat to ask questions or offer feedback at any time
-  Use the “raise hand” feature in Teams to signal you have something to say
-  The “dialogue boxes” icon on the slides indicate where we most want your feedback

Welcome and Introductions



1. Name
2. Organization
3. What connections do you have to ORI?
4. Icebreaker: Are you more of a rule follower or a rule breaker?

What We'll Be Covering Today



OHCS overview



What is rulemaking, and why does it matter?



Review of proposed rule & manual updates



Draft impact statements discussion

How OHCS Works



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

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Serving Oregonians across the housing continuum

Housing Stabilization



Affordable Rental Housing



Homeownership



Disaster Recovery and Resilience



What Is Rulemaking?

Rules Put Laws Into Action

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



Why Are You Here?



- We want Oregonians to be as involved in policymaking as possible.
- When the public is involved in policymaking, it leads to decisions that are:
 - More effective
 - Meet more of the community's needs
 - Longer lasting

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What Is Your Role Here Today?

- You have been invited to represent the interests of people who would likely be affected by these rules.
- We intentionally chose this group based on:
 - Experience as a rehousing services provider; or
 - Previous administration of rehousing grant funds from OHCS
- Your recommendations will be presented to our executive leadership with the final rule draft, which will ultimately be filed with Secretary of State.



Rule and Manual Updates

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History of Oregon Rehousing Initiative (ORI)

- **SB 5701 (2024)**

- \$39 million allocated in the 23-25 biennium
 - \$3.4 million set aside for Housing 360 Pilot Program
 - Awarded 4 regions
 - Not subject to ORI OARs or Program Guidance updates
 - \$35.6 million direct awarded to 25 grantees
 - MAC groups, LPGs, and CROs
 - Funds rolled over into 25-27 biennium

- **HB 5011 (2025)**

- \$50.3 million allocated in the 25-27 biennium
 - Direct awarded previously awarded grantees
 - MAC groups, LPGs, and CROs

Proposed Rule Text – OAR 813-270

- 813-270-0015 Definitions
 - Removing definitions related to Unit Access
 - Acquisition, Block Leasing, Construction, Conversion, Rehabilitation, Renovation, Repair and Maintenance
- 813-270-0025 Manuals
 - Updating program guidance, planned effective date: March/April 2026
- 813-270-0055 Use of Funds
 - Removing listed services
 - Supportive Services and Unit Access
- 813-270-0065 Application for Funding, Funding Agreement
 - Repealing rule and requirement to complete a regional plan

ORI Program Manual Updates: General

What is changing?

- Updating Contact Information
- Program Overview: Updated program summary language
- Removing Regional Plan requirement: Not currently a funding requirement
- Removing Regional Housing Liaison language: Not being required for new ORI allocation

ORI Program Manual Updates: General (cont.)

- Removing Category 6 definition of homelessness
 - Redundant to category 1
- Simplifying Household Definition
- Program Reporting Requirements
 - Refer to grant agreement
- Performance Measures
 - Refer to grant agreement
- Advanced Funds Request
 - Refer to grant agreement for any further requirements



Do any of these impact your organization's ability to deliver the ORI program?

ORI Program Manual Updates: Program Compliance Monitoring

What is changing?

- Incorporating program compliance guidance:
 - Risk Analysis
 - Monitoring requirements and cadence
 - Monitoring notices and kick-off
 - Findings reports and risk ratings
 - Close-out
 - Subgrantee Monitoring
 - Monitoring requirements and cadence
 - Physical Inspections
 - NSPIRE requirements and inspections



Do any of these impact your organization's ability to deliver the ORI program?

ORI Program Manual Updates: Allowable Expenses

What is changing?

- Supportive Services
 - Shifting to utilizing local resources first before using ORI funds in this way
 - Documenting attempts and keeping in participant file
- Unit Access
 - Removal of category
 - Removal of allowable uses: Block Leasing, Conversion, Maintenance, Renovation, Rehabilitation, and Unit Repair
- Rapid Rehousing
 - Adding allowable uses, previously allowable under Unit Access: Landlord Incentives and Landlord Engagement



How would these impact your organization's ability to deliver the ORI program?

Draft Impact Statements

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Fiscal Impact

The Oregon Rehousing Initiative will alleviate negative fiscal impacts to vulnerable Oregonians through the provision of additional financial support.



Does this statement align with your experience or understanding as an impacted community member?

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Impact on Small Businesses

- The ORI rules may directly impact small nonprofits that operate shelters or alternatives to shelters or provide street outreach, and other homeless services providers. ORI rules may result in positive direct benefits for these small businesses that can be reimbursed for ORI funding. ORI rules do not regulate other small businesses outside of nonprofits that receive ORI funding.
- OHCS estimates that approximately 50-100 small businesses could be subject to or benefit from these rules. This includes local homeless service providers and nonprofit organizations.



Do these statements align with your experience or understanding as an impacted community member?

Costs of Compliance

- Grantees and subgrantees must complete several reporting and administrative activities. These activities include HMIS data entry, financial reporting and performance reporting. OHCS does not anticipate that the costs incurred by recipients of ORI funds as a result of these required reporting and administrative activities will increase as a result of the proposed rule changes.
- No major equipment purchases are required. Staffing and operational costs are eligible costs under OHCS provided administrative funds of the grant.



Do these statements align with your experience or understanding as an impacted community member?

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Racial Equity Impacts

The ORI rules and program guidance as implemented in rule are designed to improve outcomes for BIPOC communities. For example, the ORI program guidance centers leading with racial equity, removing barriers and simplifying processes, supporting local flexibility and responsiveness, and strengthening landlord relationships as the guiding principles for program delivery. These elements reflect OHCS's commitment to equity.



Does this statement align with your experience or understanding as an impacted community member?

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Recap and Next Steps

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What We Heard from You Today: Manual – NSPIRE Requirement

- NSPIRE inspections would fundamentally change implementation of program, divert folks to desired housing, delay move-ins, and limit housing options.
- Adds cost and time to the rehousing process.
- Training can be expensive. Will it be allowable expense?
- Not all allowable housing types are likely to pass NSPIRE inspections (e.g., RVs).
- Providers with no experience with housing/NSPIRE have no reference point for implementation, causing delay/difficulty. Possible case-by-case requirement determination? Is there an allowable alternative?
- Want to understand how local service providers can implement NSPIRE. Costs/staff resources are a concern & want to follow-up with local conversations.
- Is there an intermediary bridge for NSPIRE, as there have been two rollout delays already with CoC/HA?
- Training needs to be an allowable expense, with ongoing training and TA from OHCS, especially for those who have not done NSPIRE before.
- Is there a bridge between NSPIRE & habitability?
- SSP guidance provides options for HQS & NSPIRE.

What We Heard from You Today: Manual – Removing Unit Access

- Removing Unit Access as eligible expense category conflicts with info recently provided from OHCS.
 - Note that UA is currently an eligible expense category. Status change would be effective when rule amendment is completed this spring.
- Since UA is not in LTRA, removing from ORI will have an adverse impact.
- Diversion, rapid rehousing needs quickness to stabilize a client. ORI limited to fund habitability standards and work with landlords to rapidly respond. Critical connection to match housing stock.
- Important to use EO learnings re: local flexibility.

What We Heard from You Today: Manual – Allowable Expenses

- Unit Repair is critical part of this program to move participants into housing and get units up to standard. It's an underrated client need that affects someone being able to stay housed.
- Have ongoing contracts for case mgmt. for people using ORI. These are critical and offer consistent \$ for staffing/hiring. This becomes an unfunded mandate which will affect, especially since CBOs will be “graded” on housed #.
- Add a separate bucket for program delivery to include things other than case management.

What We Heard from You Today: Manual – Supportive Services

- If asked to document each time we try to use local resources first, the time spent on paperwork will outweigh any potential savings of ORI funds.
- Being able to use ORI RRH funds under the EO for supportive services distinguished ORI from historical RRH programs. Losing that flexibility will negatively impact the ability to stabilize someone in housing. It takes time to leverage with local supports and have someone stable.
- Landlord relationship success is due to built out resources, dedicated contact, and level support to back up desire of tenants through program.
- Is the shift away from supportive services to emphasize higher utilization in rental assistance and client assistance?

What We Heard from You Today: Manual – Rapid Rehousing

- Local service provider has built support team as holistic program. Pulling case mgmt. will cause significant shift in ability to create wrap-around supports to ensure stability.
- Landlord relationship success is due to built out resources, dedicated contact and level support to back up desire of tenants through program.
 - Agreement, good point for CSOs up to 50% AMI. Detailed level of care and relationships allow for increased village of care & builds good tenancy to house other participants.
- Changes to block leasing ability can create more instability.

What We Heard from You Today: Fiscal and Small Business Impacts

- Fiscal:
 - Impact of ORI for fiscal impact can be stronger
 - Change “alleviate”
 - “Fiscal” not reflective of households’ experiences
- Small Business:
 - Number of businesses affected will be higher than 50-100 if removing Unit Access. Many of our participating landlords are small businesses.
 - Phrasing feels removed from actual work done in community.
 - Caution how OHCS frames success for a small CBO.
 - “Positive direct benefit” suggests a positive net benefit or profit, which is not the case. The positive effect would be keeping money in the local economy, in the hands of local landlords and service providers.
 - Non-financial piece with management. Can’t put \$ there because of emotional and turnover. Funds helps diversify network with small business.

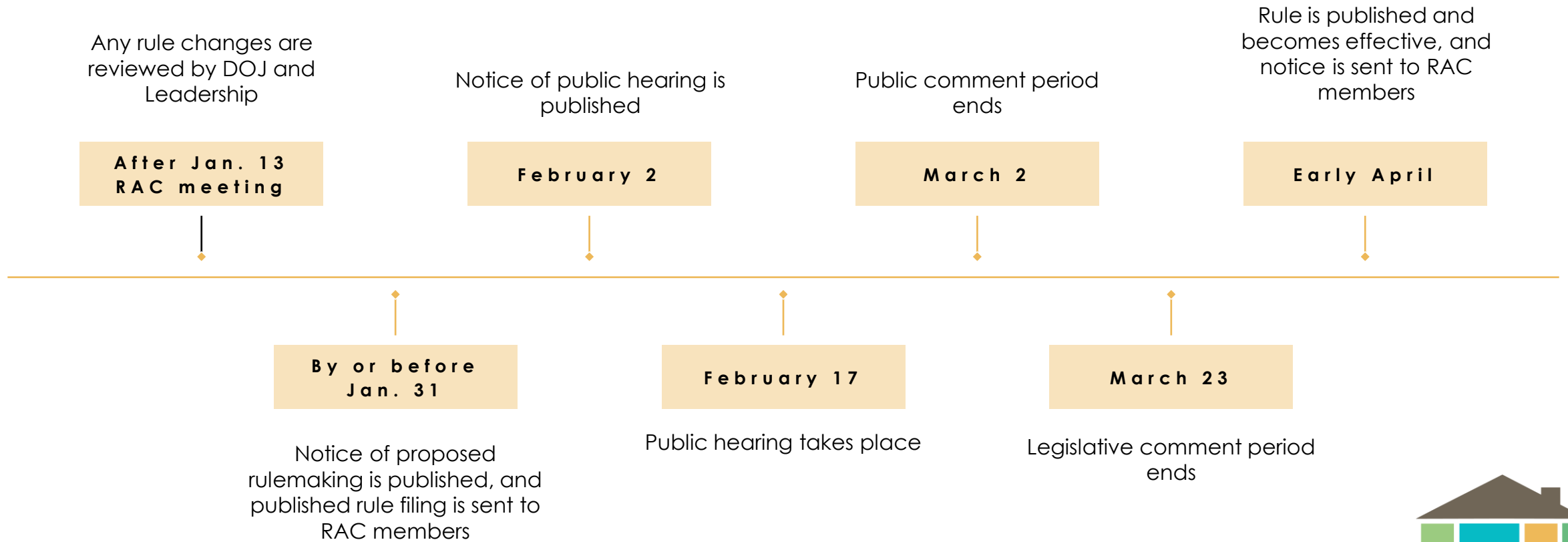
What We Heard from You Today: Cost of Compliance and Racial Equity Impacts

- Cost of Compliance:
 - NSPIRE training costs factor in
 - Do anticipate cost increases
 - Costs of admin/provider work is not reflected.
 - Deboarding and onboarding, task reassignments. We are being asked to do with less.
- Racial Equity (and Other Equity Concerns):
 - Landlord costs and removing conversion, dealing with older building w/o ADA and impact when working with ADA community
 - Grassroots orgs are critical components to work, and building these relations and accountability to state that these partners meet certain standards makes it difficult to make sure there is equity because groups respond in different way. Be more reflective of process in place.
 - Don't remove flexibility (like UA) and replace with requirement (NSPIRE).

What We Heard from You Today: Misc.

- Unanswered Questions / Follow-Up Needed:
 - How should grantees notify OHCS that it is imposing income limits? If not explained in rules or manual, please provide more instruction somewhere.
 - Can block leasing be considered a “landlord incentive”?
 - Can the Housing Choice Landlord Guarantee Program be utilized to cover some of the unit repair costs no longer allowed by ORI?
 - Clarify which items under Unit Access are being removed as eligible expenses and which are being moved to another category but will still be eligible.

Next Steps and Estimated Timeline



Note: Dates may be pushed back if revising, review, or approval takes longer than anticipated.

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Thank You!

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