



Rulemaking Engagement Record

Oregon Rehousing Initiative

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Oregon Housing and Community Services

Last Updated: Feb. 3, 2026

Finalized Date:



Table of Contents

Table of Contents.....	2
Rules Notices.....	3
Oregon Rehousing Initiative	4
Rules Advisory Committee	4
Notice of Proposed Rulemaking	4
Public Hearing	4
Permanent Rule Order	4
Engagement Summaries.....	5
Rules Advisory Committee	6
Summary of Feedback and OHCS Responses.....	6
Rules Public Hearings.....	17
List of Attendees.....	17
Summary of Comments and OHCS Responses:	17
Rules Engagement Materials and Meeting Transcript	18
Participants Agenda	19
Slides	21
Shared PDFs or other supporting documents.....	21
Meeting Transcripts.....	21
Transcript of RAC Meeting	21
Appendix	55
RAC Feedback Received	56
Public Comments Received.....	58

Rules Notices



OREGON REHOUSING INITIATIVE

RULES ADVISORY COMMITTEE

Date: Jan. 13, 2026

Location: Virtual – [Teams Webinar](#)

RAC Materials link

NOTICE OF PROPOSED RULEMAKING

Date: Jan. 30, 2026

Notice of Proposed Rulemaking [link](#)

PUBLIC HEARING

Date: Feb. 17, 2026

Location: Virtual – [Teams meeting](#)

Public hearing notice [link](#)

PERMANENT RULE ORDER

Link will be added once permanent rules are filed

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

Engagement Summaries



RULES ADVISORY COMMITTEE

A Rules Advisory Committee (RAC) met on Jan. 13, 2026, from 1:30 to 3 p.m. PT via Teams webinar.

Of the 14 confirmed RAC participants, 11 attended the meeting (attendees' names in **bold text** below) and provided feedback on the draft rules and manual and proposed impact statements drafted by OHCS:

- Kenzie Bispham, Klamath & Lake Community Action Services
- **Aundrea Braniff**, Lane County
- **Melanie Doshier**, ACCESS
- **Katie Gentry**, Washington County
- Heather Johnson, Community Action Team
- **Rosie Laurie**, Central Oregon Intergovernmental Council
- **Claudia Limon**, CAPECO
- **Dahana Louis**, Urban League of Portland
- **Mitzi Mason**, Mid-Columbia Community Action Council
- Karen Rockwell, Housing Authority of Lincoln County
- **Nichole Rutherford**, City of Coos Bay
- **Monica Steele**, Clatsop County
- **Heyleigh Strempel**, United Community Action Network
- **Rebecca Taylor**, Benton County

All RAC participants were provided with copies of the proposed impact statements and draft rules and program guidance prior to the Jan. 13 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 on Jan. 14 for review and additional feedback. All RAC materials provided can be found [here](#).

SUMMARY OF FEEDBACK AND OHCS RESPONSES

Oregon Rehousing Initiative (ORI) contact:
HSD.HomelessServices@hcs.oregon.gov

RAC facilitator contact:
Rachel.Bennett@hcs.oregon.gov

General

Question: How should grantees notify OHCS that it is imposing income limits? If not explained in rules or manual, please provide more instruction somewhere.

- **Response:** We have updated the program manual to reflect that this information will be gathered through a reporting template that will be submitted on a quarterly basis. The initial quarterly reporting template will be provided by program staff shortly after execution of HB 5011 ORI grant agreements.

RAC Feedback: It's important to use the lessons learned during the Executive Order work regarding local flexibility. I understand that it's important to utilize the systems that are in place, but there is a lot of need for local autonomy over some things because it can look very different on the ground depending on how each community implements things. OHCS has been great about including language in agreements like, "unless you've talked to OHCS and establish your own alternative way."

- **Response:** Thank you for the feedback here. We have made efforts to incorporate this feedback in our updated program guidance.

NSPIRE Requirement

RAC Feedback: NSPIRE inspections would fundamentally change our local implementation of ORI. We operate a diversion model where we divert folks into self-selected housing, and adding NSPIRE inspections would be costly and time-consuming. It would delay move-ins and reduce available housing options through our program.

- **Response:** Thank you for the feedback here. We determined that NSPIRE requirements will no longer be proposed as a part of the ORI program. We have provided further guidance on habitability requirements that will need to be met for a unit and the window of time available to document these requirements as an approach to mitigate constraints that may delay move-ins.

RAC Feedback: Diversion and rapid rehousing need to be able to move quickly to stabilize a client. Hopefully, we can connect them to long-term housing assistance, like a Section 8 voucher, where NSPIRE would be required. ORI is limited in its ability to fund things that are short of full housing that meet

habitability standards. If it is required that all ORI-funded units meet these standards, we're going to be limited in how many units are available for use.

- **Response:** Thank you for your feedback. Please see the above response regarding NSPIRE requirements.

RAC Feedback: Working with landlords around the NSPIRE requirements presents a significant barrier in our ability to rapidly respond. Our ability as a housing assistance provider to match the timelines of our private housing market is a critical connection that has to be made to be able to build those trusting relationships with the idea that eventually, maybe as a person stabilizes, we can then work on a placement that fits into NSPIRE. If there's any flexibility in the NSPIRE requirements—like implementing them within a certain period of time upon housing placement—that could present a barrier, too, if the landlord is not willing to make the necessary improvements after placement.

Question: NSPIRE training can be expensive. Will it be an allowable expense?

- **Response:** Based off feedback received regarding NSPIRE, we are no longer proposing the requirement of NSPIRE inspections or requirements and have shifted language to propose basic habitability requirements and inspections. Costs to train staff directly related to program delivery for ORI or indirectly related to ORI may be reimbursable based on your agency's cost allocation plan.

RAC Feedback: It's very difficult to get an RV placement to pass an NSPIRE inspection, but that is an allowable housing type under ORI, so that presents a conflict.

- **Response:** Thank you for your feedback. Please see responses above regarding NSPIRE requirements. RV placement requirements will remain as is.

Question: We don't have a housing department or any experience with NSPIRE. Without a reference point, we could be very limited in moving forward. Is it possible to have regions evaluated on a case-by-case basis? Is there an allowable alternative to NSPIRE?

- **Response:** Based off feedback received, we are proposing to incorporate habitability standards in place of NSPIRE requirements in an effort to mitigate any possible limitations that may have been created from the initially proposed requirement.

RAC Feedback: We want to understand how local service providers can implement NSPIRE. Costs and staff resources are a concern, and we want to follow up with local conversations.

- **Response:** Thank you for your feedback here. Please see above responses. The initial proposed language required the landlord to inspect each unit under NSPIRE requirements and provide the copy of the inspection to the service provider. We are no longer implementing NSPIRE requirements.

Question: Is there an intermediary bridge for NSPIRE, as there have already been two rollout delays with CoCs and housing authorities?

- **Response:** Thank you for your feedback. We pivoted to incorporate feedback regarding NSPIRE; please see responses above.

RAC Feedback: NSPIRE training needs to be an allowable expense. Offer ongoing training and technical assistance, especially for those who have not done NSPIRE before. Having ongoing training and technical assistance from OHCS to help agencies new to NSPIRE would be helpful.

- **Response:** Thank you for your feedback. Based on the feedback received, we are no longer requiring NSPIRE. Please see responses above.

RAC Feedback: There is a balance to be struck between NSPIRE standards and a livable system that sets people up for success.

- **Response:** Thank you for that feedback. We worked to incorporate this into our proposed language for habitability standards.

Suggestion: The Statewide Shelter Program guidance provides options for HQS and NSPIRE.

- **Response:** Please see responses above.

Rapid Rehousing

RAC Feedback: “Rapid Rehousing” is typically associated with a specific program model that includes housing relocation and stabilization services, ongoing case management, and time-limited rental assistance. In our approved local implementation, households are not supported with housing search assistance or ongoing case management in the way that is traditionally defined within the Rapid Rehousing model. Our implementation operates with greater flexibility and functions more accurately as a rehousing program rather than a

Rapid Rehousing program. Clarifying this distinction in the manual would better reflect the approved local models, reduce confusion for providers and partners, and ensure alignment between program design and implementation.

- **Response:** Thank you for your feedback around language and program implementation. While we do understand that local implementation may look differently on the ground and we want to be flexible with that, the intent of this program is to be a rapid rehousing program; however, we will take this feedback under further consideration and plan to follow up further on this topic before incorporating any language shifts. We will continue to flag this topic and plan to address in the next round of rule amendments.

Removing Unit Access

RAC Feedback: Removing unit access as an eligible expense category conflicts with information recently provided from OHCS.

- **Response:** The initial proposal was to remove the Unit Access category as an allowable category as well as remove or shift allowable expenses under this category. We have updated the rules and guidance to continue the use of Unit Access as an eligible category.

RAC Feedback: We have projects supported by the Long-Term Rent Assistance program that are utilizing ORI to pay for block leasing. Since unit access is not in LTRA, removing it from ORI will adversely affect those placements.

- **Response:** Thank you for the feedback here. We have worked to incorporate feedback here, and Unit Access will continue to be an eligible category under ORI.

Allowable Expenses

RAC Feedback: Unit repair is a 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.

- **Response:** Thank you for that perspective. We worked to incorporate feedback and pivoted to continue to allow for unit repair if it is needed to bring a unit up to habitability standards outlined in program guidance or for a unit to be ADA compliant.

Question: Can the Housing Choice Landlord Guarantee Program be utilized to cover some of the unit repair costs no longer allowed by ORI?

- **Response:** Households placed from April 2024 through Jan. 10, 2026, may be eligible to have Housing Choice Landlord Guarantee Program (HCLGP) cover costs of damages up to \$20,000. We are proposing that, if there is a need for damages to be covered, agencies submit a request by following up with staff, and we can send out the link of where to submit a request for evaluation. What we will be reviewing is to see if the household could potentially qualify for HCLGP prior to utilizing ORI for damages. If the household may be eligible for HCLGP, we will be directing the request to that program/workflow.

Suggestion: Add a separate bucket of program delivery and separating out other supportive services like work support or training and education or transportation assistance, things that are monetary other than case management.

- **Response:** Thank you for that feedback. We incorporated elements of this suggestion. We broke up the program delivery aspect of supportive services from the financial assistance aspect and are only requiring documentation of attempts to leverage other programs for the financial assistance aspect of supportive services.

RAC Feedback: Landlord relationship success is due to built-out resources and having a dedicated contact for landlords so they can reach out if they start to see any behavior they would like help with. We can connect with landlords so they know what to expect, what supports we're providing to these tenants, and show why our people should be considered tenants of choice.

- **Response:** Thank you for that feedback. Landlord engagement and wraparound services will continue to be covered under the ORI program.

RAC Feedback: A local service provider has built a support team as a holistic program. Pulling case management will cause a significant shift in the ability to create wrap-around supports to ensure stability.

- **Response:** Thank you for that feedback. The intent was not to remove supportive services but to require that other resources be leveraged first prior to utilizing ORI funds. We have incorporated this feedback; we separated the program delivery aspect of supportive services from the financial assistance aspect and are only requiring documentation of attempts to leverage other programs for the financial assistance aspect

of supportive services. This means that if you regularly partner with the local service providers as part of your program delivery model, you do not need to leverage other programs before utilizing ORI funds for that service or meet any additional documentation requirements.

Question: It seems like a lot of regions are utilizing block leasing, so what is the thinking behind allowing it as a cost so that communities build up that system and then removing the funding rather than allowing them to build on it? It seems like that shift creates more housing instability.

- **Response:** Thank you for that feedback. As you may be aware, we are headed into the state legislature's short session. As we get closer, we are receiving questions around cost containment for other programs like shelter and prevention funds. Due to this, we proposed recommendations that made an effort to highlight the increased need by centering the program on the most essential elements of a rapid rehousing program such as prioritizing rental assistance and housing case management. Additionally, when we reviewed the usage of the budget category, Unit Access, where block leasing is an eligible activity, there was a less than 1% overall utilization of this category. This highlights the importance of gaining feedback from you all regarding how funds are being utilized. Based on this feedback, we have learned that this is a critical part of some regions' implementation of ORI, so we have pivoted to keep block leasing as an eligible expense under Unit Access.

Question: Can block leasing be considered a "landlord incentive"? If block leasing is the only way that a landlord is going to work with us, can't that be considered an incentive?

- **Response:** Based off feedback received, we are no longer proposing the removal of block leasing, and it remains an eligible use of funds under Unit Access.

Clarification Needed: 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.

- **Response:** The initial proposal removed block leasing, conversion, rehabilitation, renovation, conversion, maintenance and unit repair as eligible categories, as well as removing the Unit Access category as a whole. Previously allowable expenses under Unit Access such as landlord incentives and landlord engagements were proposed to continue to be

allowable but be shifted to the rapid rehousing category. Based on the feedback received, Unit Access will remain as an allowable category.

Supportive Services

RAC Feedback: If we are 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.

- **Response:** Thank you for that feedback. Staff documentation time for the ORI program is an eligible expense for program delivery under rapid rehousing; however, we have worked to incorporate this feedback and have updated this proposed language. Please see previous responses regarding supportive services.

RAC Feedback: We have ongoing contracts for supportive services. Our contracts with community based organizations for supportive services are critical because they guarantee a certain rate of operating costs for CBOs to be able to staff up and provide consistent support for people utilizing rental assistance. If not for those supportive services, the majority of our folks rehoused under ORI wouldn't be housed right now.

- **Response:** Thank you for that feedback. Please see previous responses regarding Supportive Services. The intent was not to remove supportive services but to require that other resources be leveraged prior to utilizing ORI funds. We have worked to incorporate this feedback; we separated the program delivery aspect of supportive services from the financial assistance aspect and are only requiring documentation of attempts to leverage other programs for the financial assistance aspect of supportive services. This means that if you regularly partner with the local service provider as part of your program delivery model, you do not need to leverage other programs before utilizing ORI for that service.

RAC Feedback: Supportive services are a critical component of our performance. If our success is measured by how many households we place and how long they are able to maintain housing, and if supportive services are not an allowable expense, you're basically creating an unfunded mandate for the performance measures.

- **Response:** Thank you for that feedback. We have worked to incorporate this feedback. Please see responses above regarding supportive services.

RAC Feedback: Being able to use ORI rapid rehousing funds under the EO for supportive services distinguished ORI from historical rapid rehousing 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.

- **Response:** Thank you for that feedback. Please see responses above regarding supportive services.

Question: Is the shift away from supportive services to emphasize higher utilization in rental assistance and client assistance?

- **Response:** This shift is to encourage utilizing mainstream services that are already available in the community prior to using ORI funds in that manner. This shift was proposed to make cost effective approaches and center the program on assisting and sustaining as many Oregonians as possible; however, we have worked to incorporate feedback regarding this allowable use. Please see previous responses regarding supportive services.

Fiscal Impact Statement

RAC Feedback: The language used here could be stronger. Most of the people being served by ORI, this is how we're getting people into housing who are living in places not meant for human habitation or shelters.

Question: Is there an intentional reason by financial support is not specific to housing financial support?

- **Response:** Thank you for that feedback and question. That was not intentional. We have updated the fiscal impact statement.

Suggestion: Change "alleviate." Also, a couple of issues raised here seem to be moving some communities backward.

RAC Feedback: "Fiscal" is not reflective of households' experiences.

- **Response:** Thank you for that feedback. We have updated the fiscal impact statement and have made efforts to incorporate this feedback. The prompt for the statement is identifying whether the rules will have a fiscal impact on state agencies, local governments, or the public and for us to explain to what extent.

Small Business Impact Statement

RAC Feedback: The number of businesses affected will be higher than 50-100 as stated if removing unit access. Many of our participating landlords are small businesses. A lot of the smaller landlords are the ones who are typically willing to navigate the changing landscape with us and try innovative tactics.

- **Response:** Thank you for that feedback. We have incorporated landlords to be part of this statement and made it clear that the number is likely larger than what is stated, as it is hard to quantify the number of landlords that regions work with.

RAC Feedback: Stating that OHCS is providing financial benefits and giving money to local small businesses, but we're on the front lines doing this extremely challenging work that has been unfunded for many years. A lot of the other systems, such as behavioral health, mental health, and all the other support services, are coming down on the shoulders of housing providers right now as we're still trying to build this system. The phrasing of this impact statement feels removed from the actual experience of what it means to be a provider in this space.

- **Response:** Thank you for that perspective. We have updated the statement to incorporate that feedback.

Suggestion: I would really caution how OHCS announces success and progress and impact on behalf of the CBOs, from a cultural standpoint, with the people who will do the work also have lived experience doing the work. I wouldn't want to bring this and provide it as justification or a positive thing to my partners that I work with daily. I wouldn't be able to make the connection for them, other than that I could continue funding their contract.

- **Response:** Thank you for that feedback. We have updated the impact statement to reflect this.

RAC Feedback: "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.

- **Response:** Thank you for that perspective. We have updated the statement to state there is an impact but removed language around the "positive direct benefit."

RAC Feedback: It's not sufficient to frame success in terms of dollars, as this work is traumatizing for people who are helping the people who are traumatized by

being homeless, and that emotional impact isn't reflected here. This statement feels like you've put some gloves on to craft it, removed from what's really happening locally.

- **Response:** Thank you for your feedback. Please see above response.

RAC Feedback: This funding has helped us diversify our resource network locally. We can pull in people who maybe wouldn't have had an interest before because we're doing a lot of relationship building and bringing in small businesses. Sometimes it's just families who own several rental units, and they are willing to dive in with us and open them up to people who would normally not get to rent from them.

- **Response:** Thank you for bringing in that perspective. We have updated the impact statement to include landlords/property owners.

Cost of Compliance Impact Statement

RAC Feedback: NSPIRE training costs should be factored in.

- **Response:** Thank you for that perspective. Based on feedback, we will no longer be moving forward with NSPIRE requirements.

RAC Feedback: Based on the proposed changes to reporting requirements and allowable costs, we would anticipate an increase to grantees' costs of compliance, which is not reflected here.

- **response:** Thank you for that feedback. We have updated the statement to reflect the increase in costs.

RAC Feedback: Costs of administration and provider work is not reflected.

- **Response:** Thank you for that feedback. Please see above response.

RAC Feedback: Deboarding and onboarding and task reassignments are costs to be considered. We are being asked to do more with less.

- **Response:** Thank you for that feedback. We have incorporated feedback to reflect increase in costs.

Racial Equity Impact Statement, and Other Equity Concerns

RAC Feedback: If you remove conversion funding, when you're dealing with a lot of older buildings and trying to find a landlord who can have an ADA-

compliant space, that's not very equitable when trying to serve the disabled population.

- **Response:** Thank you for bringing in that perspective. We have updated allowable uses to reflect this feedback.

RAC Feedback: We have a network of providers in our community, from individuals to churches to very grassroots, community-based organizations that are critical components in this work. When we have an obligation to the state to demonstrate that these folks meet a standard that is very clinical or sterile and in a neat little box when the world doesn't look like that out here, it will have a negative impact on the racial equity and the cultural equity of our ability to deliver services. If we lose the flexibility we gained during the EO programs' implementation, we will start to see the erosion of the progress we've made with generating these community groups, building that trust, and having the capacity building.

- **Response:** Thank you for that feedback. Please see response below.

RAC Feedback: For us to be able to serve the subpopulations that are underserved and overrepresented in the homelessness system, we need as much flexibility as possible and as much access to housing options that are available. Removing that flexibility and adding stronger requirements (like NSPIRE) makes it more difficult for us to work with these folks, not easier.

- **Response:** Thank you for the feedback here. We determined that NSPIRE requirements will no longer be proposed as a part of the ORI program. We have provided further guidance on habitability requirements that will need to be met for a unit and the window of time available to document these requirements as an approach to mitigate constraints that may delay move ins.

RULES PUBLIC HEARINGS

The rulemaking hearing on the proposed rule amendments will be convened on Feb. 17, 2026, at 1:30 PM (PT).

LIST OF ATTENDEES

[NUMBER] people attended, [NUMBER] of whom were OHCS staff:

SUMMARY OF COMMENTS AND OHCS RESPONSES:

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

Rules Engagement Materials and Meeting Transcript



PARTICIPANTS AGENDA

DIVISION 270 – Oregon Rehousing Initiative (ORI)

Rules Advisory Committee Meeting Agenda

Jan. 13, 2026, at 1:30 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 ORI and subsequent eligibility of these rehousing resources.
- To create space to uncover different perspectives that can inform the implementation of ORI 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 ORI.
 - *Icebreaker: What is a rule that you live by?*

Overview of OHCS and the Rulemaking Process

Background on ORI Implementation

- Senate Bill 5701 (2024)
 - Housing 360 Pilot Program
- House Bill 5011 (2025)

Opportunity to Review & Improve the Draft Rules and Program Manual

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

Impact Assessments

- State RAC procedures require assessment of impacts in the following areas:

- fiscal impact on state agencies, local government, or the public
- potential of significant impact on small businesses
- reporting and other administrative activities required for compliance
- impact on racial equity statewide

Next Steps & Closing

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

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 rehousing 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 slide deck presented at the Jan. 13 RAC meeting can be found [here](#).

SHARED PDFS OR OTHER SUPPORTING DOCUMENTS

All materials shared with the RAC are linked above and can be found on the OHCS Administrative Rules website.

MEETING TRANSCRIPTS

TRANSCRIPT OF RAC MEETING

Jan. 13, 2026, 1:30-3:00 PM (PT)

SERVIN Nicole * HCS

Hi, all. I think people are still filtering in, but I just wanted to introduce myself. I'm Nicole Servin. I'm a program analyst here at OHCS, and I'll be presenting a little later on. I use she/her pronouns, and I'm really excited to have you all here today as we kind of get the meeting started.

BENNETT Rachel * HCS

While we're waiting for the last of our group to filter in, if we go ahead and move to the next slide, we can start with some housekeeping stuff. And just by way of introduction, my name is Rachel Bennett, my pronouns are she/her, and I am the divisional rules coordinator for the Housing Stabilization Division at OHCS. I'll be one of your facilitators this afternoon for the Rules Advisory Committee for the Oregon Rehousing Initiative. So, if that is the room you're expecting to be in, great!

First up, some process agreements so we all kind of level set. We have a pretty diverse group here, and so we want to make sure that we are trying to seek common ground and understand divergence. Everybody deserves to be heard, and everyone has a piece of the truth. I want everyone here to challenge yourself to engage in ways that honor the voices and thinking space of others. Not everybody's going to agree with how we're approaching these things or maybe the language that we use or the background that we're coming from, and we kind of want to still try to reach consensus and move forward together. Share the air time. Ask yourself, 'why am I talking?' or 'why am I not talking?' Please don't think that what you have to share or the experience that you're coming from isn't valuable or important enough to share in the space. We do

want to hear from everyone who wants to talk, so try to balance the contributions to respect the topics at hand and each other. To make the most of our time together, please practice active virtual participation to the maximum extent that you're able. Make sure your Teams name is accurate so that we can call on you appropriately. If you are comfortable, to the extent you are comfortable, please have your camera on and your microphone muted unless you're speaking or if we're engaged in open conversation. Just helps limit background noise. You can also use the chat feature for any questions or comments you want to ask but don't feel comfortable saying out loud. That's totally fine. If you do want to come off mute to speak, please raise your hand. It helps us kind of keep our process organized and see who is speaking when so we have a clear record. Also, we'll be launching a few polls throughout the presentation, just sort of an alternative engagement form to see where folks are at as far as previous participation or existing knowledge. And finally—if you can, we know it's difficult in a digital space especially—try to minimize multitasking. A lot of notifications popping up, I know. For our OHCS team here, we'll probably be looking off at some different screens or taking notes, but please know, we are very much focused on the presentation at hand. You have our full attention. Finally, please take care of yourself. This is an hour and a half that we have allocated to this presentation. That's a long time to maintain focus on any one thing, especially given the sometimes sensitive topics at hand. If you need to take a break, step away, get something to drink, if you need to leave the meeting, that's fine. We can always follow up with you afterwards. We can get written feedback from our RAC participants after the meeting. But absolutely prioritize yourself and your care. So, next slide, please.

Active virtual participation in Teams logistics: Please keep yourself muted when not talking. Our members of the public that are here for observation purposes: the RAC meeting is not a space really for public feedback, but we do invite the public into our RAC spaces for purposes of transparency, education, and accountability. We want you to see what we are doing and how we are arriving at our rules-related decisions. We do ask, however, that you keep your mics muted and your cameras off, one, for bandwidth, and two, to kind of distinguish who is a RAC participant and who is a member of the public. At the end of this presentation, we will have information about when the public can give us feedback on our draft documents, the rules, the impact statements, the program guidance, but that is going to be next month. We're gonna ask the public to kind of hold off on that. This is a space for us to get our feedback from

the RAC participants specifically. Like I said before, if you don't wanna come off mute, go ahead and use the chat. The RAC participants can also e-mail us after this presentation with follow-up comments or feedback. If you do need to speak, please raise your hand in the Teams interface. You can raise your hand on the camera; that's not really a guarantee we'll see you, but we can try that as well. Throughout the slide deck, there are going to be these little dialog boxes on some of the slides that sort of indicate when we really want to make sure we get your feedback and that we've documented it correctly, which we'll go over at the end of the presentation to make sure we've captured everything accurately.

I think we have some items in the chat for you, or will shortly. If you have any questions about the content of the presentation as far as the ORI proposed changes to rules or program guidance, please e-mail our two program analysts that are here for the presentation. Nicole Servin and Kelsie Cruz, via the HSS gatekeeper e-mail, which Jaci has just put in the chat for you. If you have any questions about the RAC materials or anything that's, like, specifically in the rulemaking vein, you're absolutely welcome to e-mail me, and I think my e-mail will be in the chat shortly, as well. My name again is Rachel Bennett, and we'll kind of coordinate the appropriate response as a team, so don't worry about getting the wrong person. We'll get you an answer no matter where it goes. I think the last thing we want to drop in the chat before we move ahead is the OHCS admin rules website. This website has a lot of stuff specific to both this rules process and OHCS admin rules kind of at-a-glance. We have the RAC materials posted on the website so that members of the public, if they're interested at this phase, they can see what we have shared with you. In the future, when we compile a rulemaking engagement record, which will have a transcript of this event, transcript of the public hearing, the slide deck, etc. Your comments, public comments, and our response is there too. That'll all be part of the rulemaking engagement record, and that will also be on this website. You can also use the OHCS admin rules website as a way to get involved with OHCS for future rulemaking activities and tell us what you're interested in, and when we schedule future RACs, we can reach out to you and get you involved. And I think that's it, if we want to move ahead to the next slide.

So, some introductions for your OHCS facilitators today. Again, my name is Rachel Bennett, I use she/her pronouns, and I'm the rules coordinator for the

Housing Stabilization Division. My connections with ORI are precisely that: I am assisting the program team in our Homeless Services Section to move through their rulemaking process. As part of our icebreaker, are you more of a rule follower or a rulebreaker? Perhaps suitably for my role, I am a consummate rule follower, but I am a custom questioner. If I don't understand the reason behind a custom or rule, I will ask about it, 'cause it causes great distress to not follow a rule, but I'll do it because it's more, I don't know, I'm just compliant like that, which is good, good for this job. So, that is my introduction to the room, and I will hand it off to Anabel next.

HERNANDEZ-MEJIA Anabel * HCS

Hi, everyone. Anabel Hernandez Mejia, she/they pronouns, and I am a community engagement specialist with OHCS, Oregon Housing and Community Services, primarily supporting all of the programs within the Housing Stabilization Division, which includes ORI. As far as being a rule breaker or a follower, if I have to completely boil it down to just a very simple yes or no kind of response, I am a rule breaker, not only because rules are meant to be broken, but much like was already said, Rachel, yes, you want to be able to kind of coexist in these good spaces where you've got these agreements, but at the same time, you've got to question some of these things and how it is that we got here. So, with that, I will pass it on to Jaci.

DAVIS Jaci * HCS

Hello, everyone. My name is Jaci Davis. I use she/her pronouns. I have the privilege of serving as the department's administrative rule coordinator, and I'm just here to support Rachel and the rest of our program team in this co-facilitated rule engagement space. I would have to say sorry, Anabel, I'm a rule follower. Even though some rules could be broken, I would rather amend the rules and follow them still. And I will turn it over to Kelsie.

CRUZ Kelsie A * HCS

Hi, my name is Kelsie Cruz. I use she/her pronouns. I'm a program analyst with the Homeless Services Section. I am a program analyst for ORI. And icebreaker.... Oh, I feel like I'm a rule follower, but I'm also a rule questioner, so there is that. And with that, I will pass it off to Nicole.

SERVIN Nicole * HCS

Thank you. My name is Nicole Servin, I use she/her pronouns, and I'm a program

analyst in the Homeless Services Section that supports the ORI program. And I also think I'm just, in general, I think I'm gonna follow Kelsie, actually, and say I'm a rule follower and rule questioner. Actually, yeah. I feel like that's the mix. Thank you.

BENNETT Rachel * HCS

Thank you, everyone. For our RAC participants, and any of our other OHCS staff that are in the room, please feel free to put your information in the chat. Answer the ice breaker or just say where you're from, what you're representing. In the meantime, we will move ahead to the next slide with Anabel.

HERNANDEZ-MEJIA Anabel * HCS

All right. Very quick overview. We're gonna be going through first a little bit of what OHCS does, and then we'll be going into the rulemaking and why it matters. A little bit of explanation, especially since this was all new for me this last year as well. Review of proposed rules and the manual updates. This is when we start getting a little bit more into the meat of things. And finally, the most important piece for which we really appreciate your participation, that is giving your feedback on these draft impact statements that we will be sharing with you. And with that, I will open up. I know that Jaci has a poll ready for us, and this is just to get a quick sense of how familiar people are with, you know, either participating or what the rule filings look like with OHCS.

DAVIS Jaci * HCS

We've got 17 folks that have responded so far. I'm gonna go ahead and end this poll so everyone can see those results.

HERNANDEZ-MEJIA Anabel * HCS

Awesome. Thank you, Jaci. Might be my view, but I'm not seeing the results, so hopefully....

DAVIS Jaci * HCS

They are in the chat box. If you click on View Poll, you'll see the 21 responses to the two poll questions that we had asked. Have you ever participated in a RAC? Majority of the folks, almost 70% said "no." Have you ever assisted OHCS in a rule filing in the past? Again, about 65% of the people on our call today have not. So, a lot of first timers with us today.

HERNANDEZ-MEJIA Anabel * HCS

Awesome. All right. Probably because I didn't respond to the poll. That's it. Wasn't showing me, but thank you, Jaci. Awesome. All right, next slide.

We'll get into what is basically OHCS. Oregon Housing and Community Services is the state's housing finance agency. We don't do direct service. A lot of that's where we rely on a lot of our partners to be able to do that. What that means is that all of the money that we get from the state and federal government, we rely on our community-based organizations, public housing authorities, and other development partners to be able to develop, operate affordable housing properties and all of the programming, and support programs that we fund. That means we contract with Community Action Agencies and several other partners throughout the state to be able to deliver far and wide what we have, not only from the government and legislation but also just our mission, as well, and being able to provide our services and housing to everybody. OHCS does not directly build or own any of the housing, and sometimes I know that ends up being a little bit of a misconception. We fund the services related to other parts of the housing spectrum, from shelters, services so that we make sure that people don't lose their housing, affordable rental housing, all the way up to homeownership. Next slide.

All right, there is another poll here. Jaci, I don't know if you want to go ahead and do that while I'll share the rest that I have. Just wanting to get a sense of which divisions you've worked with.

One of the things with OHCS, much like I mentioned the housing spectrum, we have four divisions that work across the housing continuum, and these address different needs for Oregonians, from homelessness and housing stability all the way up to homeownership. As I was mentioning, and also more recently, was Disaster Recovery and Resilience, which got created as a result of the 2020 wildfires. Housing stabilization programs mostly serve people between the 0% to 30% AMI; affordable housing is a little bit mostly under 80% AMI; and then the legislature recently expanded our ability to be able to help build housing moderate income so that moderate income families could afford, and those go up to about 120% AMI. To finish up: the core of OHCS work is equity. Racial inequity plagues our housing system, and OHCS is committed to improving

equitable outcomes in all of our program designs, supporting and promoting an inclusive agency culture. Also, exploring implicit biases that impact program outcomes and for which, again, we really greatly appreciate your perspective and being able to share on some of the impact statements that we will be discussing later on today.

And then did we get a chance to--? All right, so it seems like housing stabilization, which would make sense why you're here, as well, but we've got some that have worked with other ones. Awesome. And now I shall pass it back over to Rachel.

BENNETT Rachel * HCS

Thanks, Anabel. We want to go over briefly what is rulemaking, especially since we have a lot of folks in the room that have not participated in RACs before and don't have much experience with our administrative rules process. So, let's jump in. Next slide. Awesome.

Rules put laws into action. Rules allow the executive agencies to put laws passed by the legislature into effect. We get plenty of instruction, to varying degrees, from the legislature during session, and the administrative rules allow us to take that guidance and build something a little more built out. In essence, laws cover the outline of how a program or policy works, maybe a little more broadbrush, and then rules are the details that make that vision a reality, something more implementable than just conceptual. Rules, because of that, must fit within the scope of law, and administrative rules carry the force of law. Rules can also be changed more easily than laws can be, which makes a lot of sense when you consider all the many locks that laws have to go through. Rules, we can change them periodically based on updates to language references that are associated therewith. As program manuals get updated, we can update our rules to adopt those manuals into our rule framework, which is becoming more common with HSD, as many of you have probably seen. It is still firm, it still carries the force of law, but it can still be malleable so that we can respond to changes on our end and from feedback that we hear from our partners or the public. Next slide.

Why are you, as RAC participants, here in this space? OHCS wants Oregonians to be as involved in policy making as possible. When you, as the public, are

involved in policymaking, it helps make our decisions more effective, meets more of the communities' needs and the varying needs across communities, while still being rather structured and as consistent and uniform as practicably possible. It makes our rules longer-lasting because we are going into this process in a more informed way. That's just good public policy. Next slide.

Your role here today as a RAC participant? You've been invited here to the RAC to represent the interests of people who will likely be affected by these rules, and that's at both a grantee/subgrantee level and also the communities that you're serving and the public at large. You have a particular lens that will help inform our decisions. We intentionally chose this group of RAC participants based on two criteria, primarily: your experience as a rehousing services provider or previous administration of rehousing grant funds from OHCS. And, of course, there's some overlap there, as well. Your recommendations that we get here today will be presented to our executive leadership with our final rule draft and manual draft, and that will ultimately be filed with the Secretary of State before next month with a notice of proposed rulemaking. That will go out to the public. The drafts that you received previously in preparation for this event, those documents may change depending on the feedback that we receive here today and how that is processed and digested by our program staff and executive leadership. This is a really meaningful phase of our rulemaking process. We really appreciate your making the time to be here with us today.

Before we move ahead, I want to check in and see if there are any questions on these big umbrella concepts of what OHCS does, why you're here, what we're trying to accomplish with this space here today, or anything else before we dive into the meat of the proposed changes. I'll take a pause and see if any hands or comments go up.

Oh, man, I'm gonna take that as a sign that we did a really great job with our opening slides. As we go along, if you do have questions, again, please don't hesitate to put them in the chat or raise your hand. We'll try to pause at various intervals to get to everybody. With that, I will turn it over to Nicole.

SERVIN Nicole * HCS

Thank you. In these next slides, Kelsie and I will be going over the rule and manual proposed changes and amendments to OAR. So, we'll be sharing some

breakdowns there. I'm gonna hand the first slide over to Kelsie to go over the history of ORI. Thank you.

CRUZ Kelsie A * HCS

History of Oregon Rehousing Initiative, also known as ORI: In the 2024 regular session, the legislature allocated OHCS with \$39 million through Senate Bill 5701 for ORI. This was part of addressing the state of emergency for homelessness that Governor Kotek called. In a series of executive orders, \$35.6 million was directly awarded to 25 grantees from the Local Planning Groups, Multi-Agency Coordination Groups, and culturally responsive organizations. \$4.4 million was set aside for a behavioral health pilot program called ORI Housing 360. The set-aside was awarded to four regions and is not subject to OARs or program guidance updates. The performance period for this allocation is from April 2024 through June 30, 2027, with the fact that it's been two biennia. We rolled over funds after June 2025. This was made possible as funds were converted from general funds to other funds. This program started with the Special Initiatives Team, which has since concluded, and the program shifted to the Homeless Services Section in April 2025. The Oregon Legislative Assembly allocated an additional \$50.3 million towards ORI for the 25-27 biennium. The performance period is July 1, 2025, through June 30, 2027. This is in the process of being direct awarded to previously awarded grantees, and under SB 5701 ORI, which includes Multi-Agency Coordination Groups, Local Planning Groups, and culturally responsive organizations.

SERVIN Nicole * HCS

Thank you. I'm gonna share an overview of the changes to the proposed rule text—or, the proposed changes to the rule text under OAR 813-270. I'm gonna share a brief overview of all the rules that would be impacted. I do wanna state that the program guidance is really connected to these rule text changes, so we'll be sharing a further breakdown of these changes as we go over our program manual slides in the in the next upcoming slides.

For 813-270-0015, Definitions, we're proposing the removal of the unit access category, so we would be removing the definitions under that category, which would be acquisition, block leasing, construction, conversion, rehabilitation, renovation, repair and maintenance.

For the second rule, we're proposing updates to 813-270-0025, Manuals. We're updating the program guidance in general, so the planned effective date would be updated here. Right now, we have a planned effective date of March 2026.

A rule that's not included here but was included in the RAC materials is 813-270-0045, Applicant Eligibility. We did have a terminology proposed change that we're no longer considering, and so that's not included at this time.

For our next proposed rule, we have 813-270-0055, Use of Funds. We are trying to shift how we list out the use of funds in this section, aligning it with our grant agreements, our program guidance, and OPUS. So really, just aligning with what the actual categories are. As supportive services is not in its own standalone category, we proposed removing it from the Use of Funds section, though it would still be an allowable use of funds. There are some additional parameters we're proposing adding to supportive services that we'll go into in some upcoming slides, but supportive services would still be allowable, just removed from this section to align with that categorical breakdown that's in our program guidance. We're also proposing the removal of unit access as a category, which would impact its being listed under the Use of Funds rule.

The last rule here is 813-270-0065, Application for Funding, Funding Agreement. This would repeal the rule and requirement of a regional plan. This was a requirement under SB 5701 or the first round of ORI, and it's not currently a requirement under HB 5011 or the second round of ORI under 25-27. We direct awarded current grantees and did not have the regional plan as a requirement. Since it's in rule, we did have to, we did incorporate this not being a requirement into the current grant agreements, so you'll see that this requirement was waived while we implemented the change in OARs.

CRUZ Kelsie A * HCS

All right. Next, we're going to go over ORI program manual updates, what's generally changing, or being proposed for the ORI program manual. Before we do, we wanted to go over why the shift is happening. As mentioned in the background for ORI, ORI shifted over to Homeless Services Section in April of 2025. The shift occurred as we are exiting Executive Order timeline and exiting from the state of emergency umbrella that many of the programs were under

with Special Initiatives Team. With that, we are updating language of the manual to move away from executive order specific guidance and are moving to align ORI program guidance with Homeless Services Section's program to create standardization across guidance as well as to reflect a program that is no longer under the state of emergency programming.

So, what is changing? We're updating contact information to reflect the main e-mail for Homeless Services Section. We used to be, what used to be listed was for the SIT team EO 2302 e-mail and will now state the HSD Homeless Services gatekeeper inbox. We are updating program overview to summarize background of the program and again shift away from EO-specific language to ensure relevancy as time goes on. We are proposing to remove the regional plan requirement, as it is not currently a program requirement for this new allocation of funding. Removing the regional housing liaison language, as it is not being required for new allocation of ORI and is likely outdated information at this time. We are proposing to remove category 6 definition of homelessness. The definition of category 6 is for unsheltered homelessness. It reads, "an individual or family that is living in a primary nighttime residence that is a public or private place not designed for human habitation," and it goes on to list some examples. Category 6 is redundant, as the definition is actually stated within category 1. Category 1 reads, "literally homeless individual or family that lacks a fixed, regular, adequate nighttime residence, meaning living in a primary nighttime residence as a public or private place not designed for human habitation," with the examples included, and then the other listed eligible household types under category 1 are still included as is listed in the manual. The removal of category 6 has already incorporated into 25-27 ORI grant agreements, as a waiver was completed to waive this definition of homelessness while we work to align rules and program guidance. We are also proposing a change to household definition to simplify, as currently the manual lists different types of households. What's currently listed for the manual is, "A single person who may be an elderly person, displaced person, disabled person, elderly person, or any other single person or group of people residing together. Such group includes, but is not limited to, a family with or without children, an elderly family, a disabled family, a displaced family, or the remaining member of a family. We are proposing a change to align with our other state-funded programs to state, "'Household' means an individual living alone, family with or without children, or a group of individuals who are living together as one economic unit."

We are proposing that the program reporting requirements and performance measures no longer be listed out in the manual, as there are two different iterations already happening. We're asking that grantees refer to their grant agreement. This helps keep reporting requirements and performance measures straight, as otherwise we would need to update the manual often to keep in line with different iterations or avoid that happening at the same time and list each of them out in the manual.

Advanced funds request: We are requesting that grantees refer to their grant agreement for any further requirements, as those that request higher amounts or more often for advanced funds will have additional requirements beyond what is listed in the manual. There are additional stipulations that are not required for the one-off or smaller amounts, and we would like to not make it a requirement for all.

With all that, we would like to pause here for some feedback. Do any of these changes impact your organization's ability to deliver the ORI program?

BENNETT Rachel * HCS

Melanie, go ahead.

Melanie Doshier

Is this a continuation? Back on the first page of updates as it relates to the manual and allowable expenses, I'm curious about the removal of unit access. That does impact our agency, as well as it's in contradiction to the most recent e-mail that came out from OHCS regarding the time-bound expenditure and goals that they're and related to OPUS, that we were including unit access again. Can you talk to that change and then the confusion in what we most recently submitted to you as it relates to the budget categories in OPUS?

CRUZ Kelsie A * HCS

I'll let Nicole answer that.

SERVIN Nicole * HCS

Sorry, I meant to start and then it muted me. Yeah, we'll be sharing a slide specific to the allowable expenses a little further on, but currently unit access is

allowable under ORI, and it would only be updated if the rule is made permanent, in which case we would make updates then. But currently, it is an allowable use under ORI, so that's why it was included in that budget update, is because it's currently allowable. It wouldn't be unallowable until we make the rule permanent or the program guidance is made effective.

CRUZ Kelsie A * HCS

Any other feedback, comments, concerns? Katie. I don't think we can hear you. Can anyone else hear?

Katie Gentry

How about now? Great. Sorry. Technology.

Feel free to stop me if this is further on, but I was curious about income eligibility limit, or income limits. This is kind of captured between bullets 1, 2, and 3 in the actual guidance. Do you want me to give feedback here, or is this further on in your updates?

CRUZ Kelsie A * HCS

I don't think we're changing anything with income limits. Correct me if I'm wrong, Nicole.

SERVIN Nicole * HCS

We're not making changes to income limits. I think we are adding a change where if your region is adding any income limitations that we be notified. I don't think we're including that in our slides, actually, so if you have feedback there, feel free to provide it here or in the chat or after that kind of space in between, by the end of the week. But I think this would be a fine space to provide that feedback.

Katie Gentry

Just guidance on how income limits are—how we should be notifying you all about income limits, since that is a change. I think many of us do have—or at least we do in the metro area—use income limits to start to see kind of who is served by these programs. So, just having much more clarity, and that doesn't necessarily need to be a program manual, but if you are now requiring us to notify you all, how you all would like to be notified would be helpful.

SERVIN Nicole * HCS

Thank you.

CRUZ Kelsie A * HCS

All right. Any other comments? Feedback? Okay, I think we're gonna move on, and I'm gonna pass it to Nicole.

SERVIN Nicole * HCS

Awesome. Thank you so much.

I'm gonna share some program compliance monitoring language that's been incorporated into our guidance. We previously did not have a very fleshed out guidance on program compliance and monitoring, and so we have incorporated a section that our program compliance team collaborated with us on. You'll see here that we've incorporated some language on risk analysis, on subgrantee monitoring and physical inspections. Under risk analysis, you'll see monitoring requirements and cadence, monitoring processes, monitoring notices and kickoff, findings reports and risk ratings, close out. Under subgrantee monitoring, you'll see monitoring requirements and cadence. Under physical inspections, you'll see some guidance on NSPIRE requirements and inspections. Previously, we really wanted to incorporate this section to add some transparency on what you can expect from program compliance and monitoring, and yeah, previously not incorporated. This is, I think, maybe new information, but hopefully transparent information.

We wanna add also include a question here. If any of these changes impact your organization's ability to deliver the ORI program, that would be great to know. Yeah, go ahead, Andrea.

BRANIFF Aundrea P

Hey, I'd like to share that the NSPIRE inspections would fundamentally change our local implementation of the ORI program because we and Lane County operate what we refer to as diversion, which means that we are just diverting folks into self-selected housing, and adding NSPIRE inspections would be costly and time-consuming. It would just delay our move-ins and reducing available housing options through our program.

SERVIN Nicole * HCS

Thank you. Claudia?

Claudia Limon

It's about NSPIRE, as well: to add bandwidth because NSPIRE training can be very expensive. Is this gonna be an allowable cost under the ORI funding so that we can increase our bandwidth with further training of staff? Because I know in the past it hasn't always been covered everywhere.

SERVIN Nicole * HCS

Yeah, I don't think we have that detailed out in the guidance, but let me follow up internally and see if we can have that we can have that responded to in our feedback summary if that's okay.

Claudia Limon

Thank you.

SERVIN Nicole * HCS

Go ahead, Rebecca.

TAYLOR Rebecca

OK, thank you. I wanted to connect on that statement about diversion and give that a little more context. We don't use that phrase necessarily, but as I see that coming up is, rapid rehousing really is that ability to rapidly respond in a situation, either that somebody's chronically homeless or has just become homeless, and utilizing whatever resources are in your community to stabilize that person with. The idea that, hopefully, we can connect them to long-term housing assistance, which would be, you know, Section 8 voucher where NSPIRE would be required, but ultimately the goal is to stabilize, right? ORI is limited in its ability to fund things that are short of full housing that meet the habitability standards. We really are limited in our ability if we are going to require that all the units that are used for ORI meet these standards. Also, the delay in time. Working with landlords around the NSPIRE requirements really do present a significant barrier in our ability to rapidly respond. The timelines, I will say, is one thing we've learned in our implementation of ORI. Our ability as a housing assistance provider to match the timelines of our private housing market is the critical connection that has to be made to be able to build those trusting

relationships with the idea that eventually, maybe as a person stabilizes, we can then work on a placement that will fit into that NSPIRE. I feel like if there's any flexibility in the NSPIRE requirements, like within a certain period of time upon housing placement, obviously that could present a barrier, too, if the landlord is not willing to make the necessary improvements, but ultimately the alternative for this person is either sheltered or unsheltered, and the goal is to get them housed. I'm sure OHCS can appreciate the limited housing stock in our state, and then putting another layer of limiting that housing availability within an NSPIRE requirement.

SERVIN Nicole * HCS

Thank you. Go ahead, and Melanie's next.

Melanie Doshier

I don't know how many agree with what everybody else is saying about the NSPIRE inspection. We do have NSPIRE-certified inspectors within our COC that are able to go do these inspections, but it is timely. There is a conflict with the allowable housing type. It's very difficult to get an RV placement to pass an NSPIRE inspection there, so there does tend to be a conflict there if you're allowing that type of housing to be spent, and the NSPIRE inspection is required there. That seems like it's gonna be hard to get an RV to pass an NSPIRE inspection. I would also like to highlight the unit access idea, utilizing that category as a way to get housing not necessarily through block leasing but through other types of landlord engagements under unit access is very helpful to get units to pass the NSPIRE inspection. Just to highlight that that unit access category, now that it's no longer available through LTRA either, having it pulled from ORI is going to impact Jackson County.

SERVIN Nicole * HCS

Nichole.

Nichole Rutherford

Yes, thank you. I would follow what the other folks have said. The only thing I would add to this: Coos Bay, representing the city, we don't have a housing department. I don't have any experience with NSPIRE at all, and the folks that have been really doing this work in our community didn't do housing before this, either, so I would be really surprised if we have any kind of reference point in regards to this program, and that could limit out or challenge us to really move

forward. I would wonder if, while that's a great opportunity, if there could be some diversion through a kind of a walking through it, like maybe case-by-case, you know, each grantee? What's available and what would be our alternative? If we don't have that, what would we do in place? Just assessing that risk and how do we mitigate those kinds of things. Again, might be totally out of line. We're learning housing as we go, so thank you.

SERVIN Nicole * HCS

Thank you. Does anyone have any additional feedback they'd like to provide on this slide? Yeah, go ahead, Rebecca.

TAYLOR Rebecca

I just wanted to express maybe more of a general way, and I absolutely understand that during the emergency declarations, it really was a matter of just getting out there and making outcomes happen for actual people on the ground, and I think that this was vocalized even with the Statewide Shelter Program, that it felt as though we were sort of going back to the playbook prior to the emergency declarations, yet we knew as a community and as a state, something needed to change when it came to those emergency declarations, so how are we continuing that perspective moving forward with rulemaking? Are we just copy-and-paste from previous years then and feeling like that will get us where we want to go as a community when we fundamentally said during those emergency declarations that we had to make a difference? I absolutely understand there's an importance of utilizing systems that are in place, but I'm hearing here that there is a lot of need for some local autonomy over some of these things because, on the ground, it looks very different given the way each community implements these things. You all have been great about creating flexibility and that language in contracts, like, "unless you've talked to OHCS and establish your own alternative way." I just would like us to remember where we came from and not have short-term memory loss about the outcomes we were able to achieve. In the beginning of this, it was all about "do we follow rules, or are we rule breakers?" and I don't think that's really the question here. It's about how are we establishing rules that actually impact real-life change for folks instead of just feeling that this is how we've always done it. So anyway, just my two cents. I just spoke my truth as I was directed in the beginning to do.

SERVIN Nicole * HCS

Thank you, Rebecca. Anyone else have any last thoughts they'd like to share? Yeah, go ahead, Katie.

Katie Gentry

I guess the only thing I would add is, NSPIRE has changed so many times, especially for homeless services system. I know it's been in effect for traditional housing authorities. It's not even implemented yet. It was supposed to go live Jan. 1. It got delayed yet again to October, so I wonder if there are habitability requirements that aren't necessarily NSPIRE standards that still are not really able to be captured well in homeless services systems. Is there an intermediary bridge? Because I definitely hear what the last person just talked about of having it be livable, and we really want people to succeed, but is there a balance between those two things?

SERVIN Nicole * HCS

Thank you. Yeah, I think we do have some habitability standard language in our guidance, but I think the NSPIRE piece is meant to bridge those pieces, too. But I think this feedback that you're all sharing is incredibly helpful. Again, I think that this is definitely a big area we really wanted feedback on and how achievable it is, how much of an impact to program delivery, so this is definitely a space where we really want to hear you on your feedback and take that into account before we make any further changes and as we go into further in the rules process. I just wanna say, really appreciate the space and being able to hear from you all.

Go ahead, Claudia.

Claudia Limon

I'm gonna come from the other side of the spectrum. We have been doing NSPIRE from the inception of ORI because most of our folks are gonna need long-term rental assistance or some type of Section 8. We were just trying to jump the gun so that when they received a potential Section 8 voucher or some other type of subsidy, we wouldn't be rehousing people at that point because the home wouldn't pass an NSPIRE. I think that if this is made to be a requirement, the flexibility of funds to pay for the training has to be there because it can get costly depending on how many people you need to train, and then maybe some ongoing technical assistance from OHCS to help those

agencies that this is not the world that they always function in, or they don't have the bandwidth or they've never done this. Maybe some T and TA funds for those folks that are in that boat? Because I can't compare my team to Coos Bay if they've never done it. That's just our process, and we have been very lucky with it and made sure. But again, there has to be funding behind the requirements you're asking us to do. If you have somebody who only has two NSPIRE people trained, they probably need to double that or more; and you have somebody who has nobody, then they need some T and TA to walk through the steps on how to do that.

SERVIN Nicole * HCS

Thank you. Thank you all so much. I really appreciate your feedback here, and it feels very important to how we end up updating this language and moving forward in this process. So again, thank you very much for all of you sharing. I'm gonna go ahead and move to the next slide. Please feel free to share further insight into the comments or into the chat and or later after this RAC as well, via e-mail.

Okay. All right, I'm gonna share some proposed changes to allowable expenses in the program guidance. Just to frame these changes: in light of some significantly reduced funds available and the continued increase in need, we're having to focus ORI on the most essential elements of a rapid rehousing program, prioritizing rental assistance and housing case management. We wanted to propose these changes here and receive your feedback towards the end of what I'll share here. Three categories or three allowable uses will be impacted here: supportive services, unit access, and rapid rehousing.

Supportive services is not a stand-alone category, but it is an allowable use. The intention here would not be for supportive services to not be an allowable use of funding but to add similar parameters around supportive services, a requirement to utilize local resources first before utilizing ORI. Supportive services can be utilized for things like work supports, basic life skills information and counseling, furnishings, and home goods. The intention here would be for local resources to be utilized first, and if local resources are not available or are not able to be utilized, then ORI can be utilized, and any attempt to utilize those local resources be documented in the participant file.

For unit access, we are proposing the removal of the unit access category and removal of some of the allowable uses under unit access, then adding some of the allowable uses that were under unit access to rapid rehousing. The proposed allowable uses we're proposing to remove are block leasing, conversion, maintenance, renovation, rehabilitation, and unit repair, and then shifting landlord incentives and landlord engagement that are currently under unit access and shifting those as rapid rehousing allowable uses.

So I'll open it up to feedback here and I can frame it with a question. How would these shifts impact your organization's ability to deliver the ORI program? Yeah, go ahead, Melanie.

Melanie Doshier

In Jackson County, we do have projects where we are utilizing the block leasing, and we have projects that are being supported by LTRA and utilizing ORI as the funds to pay that block lease fee, so that would significantly negatively impact Jackson County if we were to do that, if we were to implement that change. I also think that unit repair is a critical part of this program to be able to move participants into housing units quickly. Being able to utilize unit repair to get the units either up to standard or when they've blown out of damage, and being able to use it that way, it's been really, really important in Jackson County. I don't know if you're gonna talk about the removal or what we're doing with the Landlord Guarantee Program, if because the state of emergency was extended—I don't know how that is playing a part in this, but I think that it's important to know where we're at with that, as well, when we're making suggestions about the changes in the ORI program.

SERVIN Nicole * HCS

Okay, thank you. On the Housing Choice Landlord Guarantee Program, I know we've included a few updates in the guidance to align with the program. We have another program analyst who runs the program, so I might include that in our program summary or maybe try to get something out a little earlier, as I know it's impacting some of the questions here today or some of the feedback that can be provided here today, so let me see if I can get a further update or a more in-depth update on that.

And I'll hand it over to Rebecca. Go ahead.

TAYLOR Rebecca

Thank you. My focus is mainly on the supportive services changes, but I remember having a conversation with OHCS just recently that it wasn't so much that unit access was being removed as an allowable cost, but it's no longer going to be a specific category outside of the overall rapid rehousing. But I mean, those are the notes from my meeting from you all, is that it's still gonna be potentially the ability to do some of those same things with the rapid rehousing dollars. As far as the supportive services, I guess I would just like to understand the intent. So, the way our current housing program is structured is we have ongoing contracts for the supportive services. So the case management supports that are directly contracting with our community-based organizations for people who are utilizing the rental assistance through our Oregon Rehousing Initiative, those contracts are really critical because they guarantee a certain rate of operating costs for community-based organizations to be able to staff up and provide consistent support for people utilizing rental assistance. I would say the majority of our folks that have utilized our Oregon Rehousing Initiative, if it weren't for those supportive services, they would not be housed right now, and that's how we're going to be graded on our performances and how quickly people are going to get housed upon engaging and how long that they're able to maintain housing. The supportive services are absolutely a critical component of our performance. And so, by doing this, it's sort of an unfunded mandate for the performance measures if you're saying that this is supposed to be the expense of last resort for that. I get the limitations, and we are doing our utmost to braid funding locally, but to put it like this, I would say—and to document on an individual household level, you know.... We've already established those systems with our community-based organizations as they engage households as far as what types of prompting and case management coaching they need to go into doing their work, but ultimately, the flexibility of using the ORI for those supportive services was the difference of the emergency declaration rapid rehousing programs from historical rapid rehousing programs, which came with none of those supports such as home TVA, for example, the ability to actually have housing navigation in the case management supports that go with those rapid rehousing dollars. I think that in some instances there may be a better language as far as flexibility. It could be, you know, within the first six months, the agencies have the ability to just be able to—'cause it takes a long time to leverage all those specific funding resources or supportive services for a person in their initial engagement in a program, but ultimately, once they're stabilized,

that's when a program like ORI is able to then leverage those more local supports, so a phased approach might be more effective. Again, maybe talking to the local community, exactly how/what actual available resources do they have locally to braid? I understand you've always been very flexible on how these ultimately play out locally, but this is a concerning component. To me, it also gives us more leverage to communicate with our contractors about really how they engage households, but at the same time, it could put a barrier that would have us prioritize other things over the supportive services which lead to the performance success of this whole program.

SERVIN Nicole * HCS

Thank you, Rebecca. Go ahead, Melanie.

Melanie Doshier

I agree with everything Rebecca said, and I'm wondering if there's a way that this can be changed to add a bucket of program delivery and separating out other support services like work support or training and education or transportation assistance, things that are monetary other than case management. I think it is critically important that we always highlight the importance of case management, not only for the folks, right, the goal is that we're working with people until they are able to maintain their own stabilization and not need assistance, and without that level of case management, we'll never know unless they just happen to show back up in the homelessness system, which defeats the purpose of what it is that we've built over time. So I'm wondering if that is a way to say like shifting to utilizing local resources, such as transportation assistance, work support, household goods, that kind of thing, where there's a monetary value, but the program delivery is not—like, if you ask us to go in and document every single time we try to provide a case management session and I had to document the attempts of how I tried to not do that, it seems like you're not actually saving any money. So, that is my.... I had another thing, but I think I lost it, but I just—oh, and then the landlords again, back to our landlord relationships. A lot of the success we have had is because we are able to build that relationship with our local landlords and say this is the level of support that the people that we placed in your housing can expect to have. Here is your landlord engagement specialist that you can reach out to if you start to see any behavior that you would like some help with. With the case management, this is what it looks like, we do in-home visits. We are like, this is what it looks like, and this is why these are actually your tenants of choice. This is

why you should select these folks. Without that level of support, then we have not only lied to our landlords about what it is that we're providing and that's gonna break down the system even further. It's bad. That's a bad change.

SERVIN Nicole * HCS

Thank you, Melanie. Go ahead, Claudia.

Claudia Limon

Mine is more of a point of clarification, 'cause I feel like I'm hearing and reading and understanding two different things. In one sentence and on the information we've been provided, unit access is gonna be removed; however, on this slide that you're at, the last bullet point is adding allowable uses, previously allowable under unit access. Is that only the landlord incentives and landlord engagement, or is that all items that are currently under unit access?

SERVIN Nicole * HCS

The current proposal would be to remove block leasing, conversion, maintenance, reno, rehab, and unit repair entirely under ORI and then add landlord incentives and landlord engagements under rapid rehousing so that those would continue to be allowable but now under the rapid rehousing bucket how it's structured in the program guidance. That's the current proposed language.

Claudia Limon

Again, when we talk about rule bending and rule breaking, the way that I see it is, if I'm working with a landlord, and an incentive for the landlord is if I do a block lease of three apartments, and that's a landlord incentive, couldn't that still be an allowable, or is there going to be more details? Because I feel like I can—you know, for me, landlord incentives look one way, but for people in other areas, they look different, right? But if the block leasing is the only way that that landlord is going to work with us, is that a landlord incentive? Would that be an allowable cost under that type of system? Make sense?

SERVIN Nicole * HCS

Yes. Yeah, I think we would have, if we move forward with that, it would be clearly outlined what would be described as a landlord incentive and if block leasing would be. I think we have some internal conversations to have there, but yeah, I think the intention would be to provide clarified guidance on what a

landlord incentive would be, what would fall under it, what would warrant an OHCS/grantee conversation to determine if it's allowable or not, that kind of thing.

Go ahead, Melanie.

Melanie Doshier

I'm sorry, I did not mean to do that, so let me lower that. I apologize.

SERVIN Nicole * HCS

Okay. Thank you. Okay, yeah, go ahead, Rosie.

Rosie Laurie

I'm just wondering, because I'm looking at the chat, and there seems to be quite a few people who are doing block leasing. What's the thinking behind allowing it as a cost so that communities build up that system and then removing those funding so that then then a community has to deal with shifting that system, which creates more instability in that region versus building on it? A sudden shift like that I could understand if nobody was doing it right. Nobody was using block leasing; let's take this out. It's not being utilized. That makes total sense to me, but obviously, that is being used. By making the shift, it seems like you're creating more instability in a region than for housing, to be 100% honest, just from the comments and everything that I'm seeing.

SERVIN Nicole * HCS

Thank you. Yeah, that's very helpful feedback. I think we'll be able to provide a more in-depth response in our feedback summary there, but I think it's really just kind of trying to frame what's essential to rapid rehousing program. But I think what we're hearing is that there are things that are essential that we're not entirely considering, or that we're considering removing, and so I think that's definitely why this feedback is incredibly helpful to hear from you. I think we'll follow up more in depth there, but just to kind of frame it in that way.

I think from here we'll need to move on to the next slide, but thank you all so much for your feedback. It's incredibly, incredibly helpful. So, thank you all.

BENNETT Rachel * HCS

Thank you, Nicole. I think that's back to me for going over our draft impact statements.

Considering what we've discussed so far about the proposed changes to the rules and program guidance, I want you to factor that all in and look at these upcoming impact statements with that in mind. So, with what we are proposing, the following statements are how OHCS perceives the impact from a fiscal or economic standpoint, cost of compliance for small businesses, and racial equity impacts, as well. So, let's move to the next slide.

Fiscal impact: Oregon Rehousing Initiative will alleviate negative fiscal impacts to vulnerable Oregonians through the provision of additional financial support. Seems pretty broad, but pause and ask if this statement aligns with your experience or understanding as an impacted community member. And by that, we include those of you working with impacted community members, as well. Again, understand, we've had a lot of conversation here, and there will be additional updates, so if you want to think about these a bit, give us written feedback over the course of this week, that's also fine, but you can share it here if you've got stuff top of mind.

All right, no hands. Let's see. There's a question in the chat that I want to raise real quick: Is there an intentional reason why financial support is not specific to housing financial support? And if we don't—

SERVIN Nicole * HCS

I can speak.

BENNETT Rachel * HCS

Go ahead, Nicole. Awesome.

SERVIN Nicole * HCS

I can just say, I don't think it's actually intentional. I think that's a great point, though. That would help in amending that language, so thank you.

BENNETT Rachel * HCS

Melanie, go ahead.

Melanie Doshier

I wonder why it's additional financial support, because most of the folks being served by ORI, this is their first—this is how we're getting people into housing who are living in places not meant for human habitation or shelters. Getting them into housing and then stabilizing them. I can't come up with better words right now, but I feel like the impact of the Oregon Rehousing Initiative, for a fiscal impact, it can be a lot stronger. This doesn't feel like a very strong, and it's kind of confusing. So, can I get back to you? I can e-mail you? Okay.

BENNETT Rachel * HCS

Absolutely.

Also in the chat: As currently proposed, I think using "alleviate" is not quite correct. Couple of issues raised appear to make some communities step backwards. And further, the word "fiscal" is not reflective of the experience of the households.

All good things for us to consider. Thank you for that feedback. Okay, want to move us ahead to the next one then, if we may. It's the 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 those small businesses that can be reimbursed for ORI funding. ORI rules do not regulate other small businesses outside of nonprofits that receive ORI funding.

The second bullet is, OHCS estimates that approximately 50 to 100 small businesses could be subject to or benefit from these rules. This includes local homeless service providers and nonprofit organizations.

So, do these statements align with your experience or understanding as an impacted community member? Claudia.

Claudia Limon

I think that if you guys do decide to go forward with removing unit access, that number is gonna be higher because we do a lot of the—in my experience, a lot of our more smaller landlords are the ones that are typically willing to navigate that changing landscape with us and willing to try innovative tactics in order for us to, you know, be successful in the work we do with the folks that we house. I think that if the unit access piece does get removed, that number is going to go higher. Again, that's just my experience.

BENNETT Rachel * HCS

Thank you, Claudia. That's good point.

I believe we have Rebecca next.

TAYLOR Rebecca

Yeah, I'm gonna try to explain something. This might get a little too woo-woo, but I will say I think that the way that this is written is removed from the actual challenge that the work that these providers do in our community, right? You're saying we're giving you financial benefits, we're plugging money down into these small businesses, but we're the troops. We're the boots on the ground doing this extremely challenging work that has been unfunded for many years, and a lot of the other systems, such as behavioral health and mental health and all the other support services, are coming down on the shoulders of housing providers right now as we're still trying to build this system. It feels a little removed from the actual experience of what it means to be a provider in this space when it's like, yeah, we'll be able to help a bunch of these businesses and give them all this money, realizing that even that money often is not enough to do this work in the way that it really needs to be done and the trauma that is experienced when that work can't be done this way. I would just say as somebody—and I'm working through a county, so I am working from a government and attempting to provide that liaison and advocacy up to the state level and be a trusted partner in this work at a local level—if I took this to them and said, "Look, look at this positive impact on your programs by this grant and oh, by the way, we don't have enough funding to really do the work that you see and you have to day in day out experience that trauma with the households that are not able to access services." I would really caution how we announce success and progress and impact on behalf of the organizations,

from a cultural standpoint, with the people who will do the work also have lived experience doing the work, and I wouldn't want to bring this and provide it as justification or a positive thing to my partners that I work with daily. I wouldn't be able to make the connection for them, other than that I could continue funding their contract.

BENNETT Rachel * HCS

Thank you, Rebecca.

I also want to give you a heads up: we do have the next slide regarding impacts to related to cost of compliance. Some of the comments seem like they're maybe addressed by those impact statements as opposed to small business involvement, but, I mean, there's kind of—pulling things from that comment that apply to both, so thank you for that.

Melanie?

Melanie Doshier

I think that the words "positive direct benefits" for those "small businesses that can be reimbursed for this work" makes it feel like there's going to be a positive net benefit, like we're making money off of this, and in all actuality, most times there's berating gymnastics that has to happen to pull the work off. It does soften the actual financial impact of administering state and federally funded rapid rehousing or housing programs in general. Most often, it's a net negative, not a net positive. I would wonder if the small business impact is more about keeping funding in the hands of the landlords and in the hands of our community members. We're paying staff to do the work, but we're not positively netting off of these programs. I also think that there is a thinking that nonprofits do make money off of the state and federal funds without having the outcomes, and so this does feel like that might be feeding into that a little bit. I do wonder—and I know that through the executive order, there was landlord partnerships like we were reporting on the amount of landlords that were in the body of work. I know in Jackson County we have 188 landlord partners and that's inclusive of small landlords and property managers, but I wonder if that's really the positive impact for small businesses, is that we're keeping our economy going with these funds.

BENNETT Rachel * HCS

Thank you, Melanie. That's a good point, and that will have an impact on the number, as well, as has been mentioned on the small businesses potentially impacted.

I'll take one more from Nichole, and then we'll move ahead to the next one. Nichole, go ahead.

Nichole Rutherford

I just want to add to what both—thank you, ladies, Rebecca and Melanie. You guys are spot on. The piece I would add is that there's this non-financial piece for at least what we see with our service provider in that yes, they're getting some reimbursement there, but the management of this because there are people attached to this work who are really, really struggling at levels some of us don't experience. It's emotional, and the staff turnover, and it's just, you can't put dollars in success there because it's traumatizing for the people who are helping the people who are traumatized by being homeless. This feels almost kind of like we put our gloves on to create this statement, a little bit removed from really what's happening locally. And then just really, you know, that both Rebecca and Melanie just kind of hitting that on the mark. This money really has helped us diversify our resource networks locally so that we are pulling in people who maybe wouldn't have had interest before, because we're doing a lot of relationship building, and you are bringing small businesses. Sometimes it's just families who own several rental units, willing to dive in with us and open them up to people who would normally not get to rent from them. I don't know if that's helpful, but....

BENNETT Rachel * HCS

Thank you. I do appreciate that, Nichole. Okay, if there are other comments or questions about this one, please put them in the chat, and we will move ahead to the next slide.

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.

I know there was some earlier discussion about NSPIRE and costs potentially associated with training and getting that stood up for regions, so kind of having discussed that I imagine would factor into these impact statements. We're aware of that. Are there other elements of these statements that do or do not align with your experience or understanding as an impacted community member?

Question: Why is it important to say that we do not anticipate costs? Just want to let you know, all of these impact statements typically come because often the legislature has said, "we want to know what the impacts of your rulemaking or programs are." For example, it's not reflected here, but there is an impact statement that requires when we file a notice of proposed rulemaking to state whether these rules, either brand new or amended, will change the costs associated with developing a 6,000 square-foot parcel of land and putting a 1,200 square-foot single family residence on top of that parcel. So at some point in the past, the legislature said, "hey, when you're out there rulemaking"—probably a lobbying group, said—"we want to know what the impacts to development are going to be based on these rules." And so now we have to put that in there, even if what we are doing is really very clearly separate from that. So that's kind of why we have to include cost anticipation as part of these impact statements, as any of the impact statements really.

Go ahead, Monica.

Monica Steele

Thank you. To say that you don't anticipate costs incurred—I mean, just the constant rule changing, amending, having to go back to make sure that we're complying. There's constant costs related with all of the work that the administrators as well as the providers are having to do, and I think that that's just...I don't know, it just is not very reflective of all the work that's being asked to be done.

BENNETT Rachel * HCS

Thank you, Monica. Valid point, for sure. Think we were looking at it in a very concrete lens, but that's true. Zooming back a bit—or, zooming out a bit. Any other comments on this one before we move ahead? All right, let's go to our next one, which I believe is our last one. Fantastic.

The 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.

Now again, I know we talked earlier about the landlord relationships piece and the impacts of removing some of those eligible costs or moving some of the costs into other categories, so kind of covered that. I think that would be—factored that in, of course. Beyond that, what part of the statement does or does not align?

Monica again.

Monica Steele

Thanks. Not specific to racial equity, but equity in general. When talking about the landlord cost and removing conversion in some areas, you know, you're dealing with a lot of older buildings, and when you're trying to find a landlord who can have an ADA compliant space and now you're taking away the conversion dollars for that type of work, that's not very equitable when trying to serve the ADA population.

BENNETT Rachel * HCS

Okay. Thank you, Monica. Rebecca?

TAYLOR Rebecca

Thank you. This was actually feedback that our community gave during the Statewide Shelter Program program manual development as well as these impact statements. There was a very similar impact statement for the SSP. The

additional reporting requirement, risk assessments for sub grantees, all those items—we have a network of providers in our community, from individuals to churches to very grassroots, community-based organizations that are critical components in this work. As regional coordinators or administrators around this, we are developing those trusting relationships with those agencies or those people or those groups, and as our accountability, so to speak—and I guess that sounds like we're trying to avoid accountability, which we're not—but mainly our obligation to the state to demonstrate that these folks meet some kind of standard that is very clinical or sterile and in a neat little box when the world doesn't look like that out here, it will have a negative impact on the racial equity and the cultural equity of our ability to deliver services. We even talked about this when the Oregon Rehousing Initiative came out, when we were having challenges around House Bill 5019 and the fact that we couldn't work with families who might be doubled up because different community groups respond to homelessness in a very different way. If we're going to continue to try to bring us back to pre-emergency declaration, we will start to see the erosion of the progress we've made with generating these community groups, building that trust, having the capacity building. Be more reflective of the process that is in place right now and where we want to be without just making a statement that this is automatically going to solve all these issues when we just here today have noticed that a lot of these things are actual direct barriers to us to be able to achieve this particular racial equity impact.

BENNETT Rachel * HCS

Thank you, Rebecca. Okay, Melanie, I'm gonna get your comment and then move ahead, if we may.

Melanie Doshier

Echo what Rebecca said, When you're adding things like NSPIRE and you're adding and you're taking away things like unit access, our ability to house folks. Because if you, if you really think about advancing racial equity, understanding that folks that fall within some of the subpopulations that are underserved, they're not only overrepresented in the homelessness system, they're overrepresented in the judicial system, they're overrepresented in all systems. For us to be able to serve them, we need as much flexibility as possible and as much access to housing options that are available. Removing that flexibility and adding stronger requirements makes it more difficult for us to work with these folks, not easier. The new rules make it more difficult, and the case

management/peer support, all of that stuff is so critically needed in the service delivery.

BENNETT Rachel * HCS

Thank you, Melanie. Appreciate that.

Okay, those are all of our impact statements. As we are getting so close to time, I want to move past the recap of the feedback we received, but what we're going to do is send this slide deck with these notes about the feedback we captured. We'll send the slide deck either this afternoon or first thing tomorrow morning. Please do take a look at these slides. There's a handful of them here at the end of the presentation. If there's something you think we have not captured or that you really wanted to emphasize and don't see reflected there, please do reach out to us. We'll have information as far as like next steps and what deadlines are and so forth. But let's go ahead and move forward to our timeline slide just to give folks an idea of what happens after today.

Like I said, after this meeting, we will send you this slide deck and some next steps. The next task as part of our rulemaking process is to file the notice of proposed rulemaking to go into the February bulletin from the Secretary of State that will have information for the public about the public hearing that we have scheduled for Feb. 17. And again, that is open to the public at large. We will be in the space for as long as it takes—generally half an hour, but we will be there as long as there are people giving comments—and you can tell us what you think. And in the published notice that will go out, I think the Secretary of State publishes it on the first business day of the month, which would be the 2nd of February. That will have updated probably draft rule language, the redline version of the program manual. Again, things may change between what the RAC was sent earlier this month to what is in the notice, so be sure to check out the differences if you're interested.

Then we have an entire month of public comments, where you can go to the public hearing or you can e-mail us or call us even, to provide public feedback between Feb. 2 and 5:00 PM Pacific Time on March 2nd. We then have a legislative comment period that's running for the same window of time, but they get 49 days. So lucky. The legislative comment period will end March 23rd, and after both of those comment periods have elapsed, on our end, we'll take all of

that into account, make any further changes to the rule or manual drafts, and we will move towards publishing the permanent amended rules, probably by early April because there's a bit of time for review and drafting and executive approval, so early April is when you should look for that updated permanent rule to come through. As RAC participants, you will get emails each step of the way to keep you updated with what has happened and what to expect coming up next, and the public should just look forward to Feb. 2.

Move ahead to the final slide, which, as a reminder, has the gatekeeper e-mail address for Nicole and Kelsey as the program analysts working on ORI. If you have any feedback or questions or comments from the RAC participants, please do reach out to this e-mail address. Again, if it's a RAC specific question as far as getting copies of information, something technical, you can reach out to me, but Kelsey and Nicole are really your go-to for content and expertise.

I just want to close out our meeting here today, right on time. Thank you so much, everyone, both members of the public for being in the space and keeping us honest and accountable and for our RAC participants. I know this was a lot of material that we sent you. These are programs that we and you care very much about, and this is a real investment of energy and time from all of you, and we are so appreciative and grateful for that. I hope the RAC experience has been minimally painful for you thus far. We'll continue to be in contact over the next few months and want to wish you all a wonderful afternoon. Thank you so much.

Melanie Doshier

Thank you.

BENNETT Rachel * HCS

Have a good one, everyone.

Appendix



RAC FEEDBACK RECEIVED

RAC feedback and OHCS responses thereto are summarized above. Below are reproductions of the full text of comments and attachments sent to OHCS following the RAC meeting on Jan. 13, 2026, through Jan. 16, 2026, which was the deadline set by OHCS to allow for sufficient review prior to finalizing the Notice of Proposed Rulemaking at the end of January.

1. Email Received

Sent: Friday, Jan. 16, 2026

To: HSD Homeless Services

Subject: Re: Oregon Rehousing Initiative: Rules Advisory Committee Follow Up

Good afternoon,

Thank you very much for holding this valuable space and the continued communications.

I wanted to provide more comprehensive feedback on how the NSPIRE inspection requirement would affect our ORI implementation in Lane County.

In Lane County, ORI is used at the front door of our Coordinated Entry system to serve people who are actively experiencing homelessness and who have identified a housing opportunity outside of an ongoing rental assistance program. This model is intentionally designed to be flexible, fast, and client driven. Participants locate housing options that meet their own needs and personal circumstances, and our staff provide short-term support. This approach allows us to resolve homelessness quickly by building on people's existing connections and community ties to secure housing.

This client-centered, self-resolution model has been successful because it minimizes barriers and administrative delays. ORI is often the difference between someone being able to take a housing opportunity they have already found and losing that opportunity due to time, paperwork, or system constraints. The flexibility in habitability standards is a critical part of this success, allowing us to work with a wide range of landlords and housing types that would otherwise be unavailable to people exiting homelessness.

If NSPIRE inspections were required under ORI, it would fundamentally change how this program operates in Lane County. Staff would need to be trained as inspectors, coordinate and conduct inspections, track documentation, and work through repair and compliance processes with landlords. These activities are time-intensive and more importantly, these requirements would introduce delays that are incompatible with the real-time, client-led housing outcomes we seek in Lane County.

The practical impact is that many of the housing opportunities our participants rely on, small landlords and quickly available units-would be lost. Clients would no longer be able to move forward when a unit becomes available, and staff would be forced to pause or deny assistance while inspections and compliance are completed. This would directly reduce our placement rate and prevent people from exiting homelessness through a model that is currently working. For these reasons, requiring NSPIRE inspections under ORI would make it extremely difficult, if not impossible, to operate this program as intended in Lane County.

Lastly, I would like to provide feedback on the use of the term “Rapid Rehousing” in the ORI manual. While not discussed as pending change during the RAC, “Rapid Rehousing” is typically associated with a specific program model that includes housing relocation and stabilization services, ongoing case management, and time-limited rental assistance. In our approved local implementation, households are not supported with housing search assistance or ongoing case management in the way that is traditionally defined within the Rapid Rehousing model.

As approved by OHCS, Lane County’s ORI implementation operates with greater flexibility and functions more accurately as a rehousing program rather than a Rapid Rehousing program. Clarifying this distinction in the manual would better reflect the approved local models, reduce confusion for providers and partners, and ensure alignment between program design and implementation.

Thank you for the opportunity to share this feedback and for your willingness to consider how these requirements impact local implementation. We appreciate the space to elevate what is working on the ground in Lane County and to ensure these programs continue to effectively serve people experiencing homelessness.

In gratitude,

Aundrea Braniff
Outreach and Coordinated Entry Supervisor
Lane County Human Services

- **Response:** Thank you for feedback on how NSPIRE requirements would impact your organization. We have worked to implement the feedback we have received on the constraints NSPIRE requirements would create for program delivery across the different models of this program. We have updated the guidance to remove the NSPIRE requirement and related language. We have also added further guidance to the existing habitability standards guidance. For the updated habitability standards guidance, in an attempt to mitigate the potential move in delays, we have added in guidance that inspections and documentation must be completed within 90 days after a client's move-in date.

Thank you as well for the feedback on the current Rapid Rehousing language in the program guidance and the insight to how as it is currently presented, may be misaligned from actual program delivery. We are currently taking this feedback under further consideration and will work to gather further feedback on this. We would like to address any possible language shifts thoughtfully and will not be implementing this change in this round of edits but we will continue to have this topic flagged for our next round of program guidance edits. We will be following up further on this topic. Please reach out to OHCS if as it is currently written, there are any hinderances to your program delivery.

PUBLIC COMMENTS RECEIVED