

By and For Initiative, Native American Tribes of Oregon (BAFI-NATO)

September 1, 2023 ~~September 1, 2022~~



By and For Initiative, Native American Tribes of Oregon: Program Guidance Operations Manual

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1. Program Summary

Oregon Housing and Community Services has committed to redesign and modernize the homeless ~~services delivery s-delivery service~~ system to better serve all Oregonians by leading with equity and racial justice, ensuring that we work to recognize and engage better serve underserved groups. This grant is a step towards affirming the need to reach out and serve populations that have been disproportionately impacted and will serve as the vehicle to allocate State General funds among the Nine Federally Recognized Tribes of Oregon. ~~Oregon Tribes~~. It is our intent to work with the Tribes to acknowledge racial disparities and to create engagements s that fosters trust and long-term relationship building. ~~trust to create relationships that will grow Tribal sovereignty and self-determination are guiding values that drive this ongoing work and partnership.~~

The By and For Initiative, Native American Tribes of Oregon (BAFI-NATO) program provides state funds to create or support local existing programs designed to prevent and reduce homelessness in tribal communities. BAFI-NATO funds are available for the following program components: street outreach, emergency ~~and, and~~ transitional shelter; transitional housing; homelessness prevention; supportive housing services; rapid re-housing; data collection; shelter or transitional housing acquisition, rehabilitation, renovation or conversion; and community capacity building designed to enhance, expand or sustain homeless and prevention services.

2. Administrative Best Practices

Administrative Best Practices are specific identified criteria used to set a foundation of administrative, fiscal and service delivery recommendations to the tribal communities. The purpose of the best practices is to ensure that no matter where individuals and families enter the homeless system, participants of the program will be provided the same access to quality services.

Five service delivery components, tailored to the grantee's community needs, have been included in the Administrative Best Practices. They are:

(A) *Housing First*

The Housing First Model encourages clients to create and implement their own goals while immediately housing or sheltering clients with no preconditions (except complying with a shelter code of conduct or standard lease agreement).

Housing First best practices include, but are not limited to:

- a) Access to programs is not contingent on sobriety, minimum income requirements, lack of a criminal record, completion of treatment, participation in services or other unnecessary conditions.
- b) Programs or projects do everything possible not to reject an individual or family on the basis of poor credit or financial history, poor or lack of rental history, minor criminal convictions or behaviors that are interpreted as indicating a lack of "housing readiness".

- c) People with disabilities are offered clear opportunities to request reasonable accommodations within application and screening processes and during tenancy; and building and apartment units include special physical features that accommodate disabilities.
- d) Programs or projects that cannot serve someone work through the coordinated entry process to ensure that those individuals or families have access to housing and services elsewhere.
- e) Housing and service goals and plans are highly tenant-driven.
- f) Supportive services emphasize engagement and problem-solving over therapeutic goals.
- g) Participation in services or compliance with service plans are not conditions of tenancy but are reviewed with tenants and regularly offered as a resource to tenants.
- h) Services are informed by a harm-reduction philosophy that recognizes that drug and alcohol use and addiction are a part of some tenants' lives. Tenants are engaged in non-judgmental communication regarding drug and alcohol use and are offered education regarding how to avoid risky behaviors and engage in safer practices.
- i) Substance use in and of itself, without other lease violations, is not considered a reason for eviction.
- j) Tenants in supportive housing are given reasonable flexibility in paying their share of rent on time and offered special payment arrangements for rent arrears and/or assistance with financial management, including representative payee arrangements.
- k) Every effort is made to provide a tenant the opportunity to transfer from one housing situation, program or project to another if a tenancy is in jeopardy. Whenever possible, eviction back into homelessness is avoided.

More information can be found at: <https://endhomelessness.org/resource/housing-first> or at <https://www.usich.gov/solutions/housing/housing-first/>.

(B) Low Barrier Shelters

Low and no barrier policies allow homeless individuals and households to access shelter, housing and services without preconditions such as sobriety, compliance with treatment plan, no pets, or agreement to participate in specific programs, activities or classes. These policies allow the most in need to have access to shelter and housing.

Low Barrier Shelter best practices include, but are not limited to:

- a) Your shelter has minimal expectations or requirements of people seeking shelter
- b) Your shelter focuses on addressing disruptive or dangerous behaviors rather than compliance to rules or case plans;
- c) Your shelter welcomes self-defined family and kinship groups to seek shelter together;
- d) Your shelter can identify financial resources that can support the adoption of low-barrier policies and practices and supports extended or flexible hours and adapted service-delivery models;

- e) Your shelter accommodates pets and belongings;
- f) Your shelter’s intake process and housing navigation services coordinate closely with community-based outreach services and coordinated entry;
- g) Your shelter creates flexible and predictable access for people seeking shelter.
- h) Your shelter uses a “harm reduction” approach:
 - i. ~~A~~ accepts for better or worse, that licit and illicit drug use is part of our world and chooses to work to minimize its harmful effects rather than simply ignore or condemn them.
 - ii. Understands drug use as a complex, multi-faceted phenomenon that encompasses a continuum of behaviors from severe use to total abstinence and acknowledges that some ways of using drugs are clearly safer than others.
 - iii. Establishes quality of individual and community life and well-being, not necessarily cessation of all drug use – as the criteria for successful interventions and policies.
 - iv. Calls for the non-judgmental, non-coercive provision of services and resources to people who use drugs and the communities in which they live in order to assist them in reducing attendant harm.
 - v. Ensures that people who use drugs and those with a history of drug use routinely have a real voice in the creation of programs and policies designed to serve them.
 - vi. Affirms people who use drugs (PWUD) themselves as the primary agents of reducing the harms of their drug use and seeks to empower PWUD to share information and support each other in strategies which meet their actual conditions of use.
 - vii. Recognizes that the realities of poverty, class, racism, social isolation, past trauma, sex-based discrimination, and other social inequalities affect both people’s vulnerability to and capacity for effectively dealing with drug-related harm.
 - viii. Does not attempt to minimize or ignore the real and tragic harm and danger that can be associated with illicit drug use.

More information can be found at

https://www.usich.gov/resources/uploads/asset_library/emergency-shelter-key-considerations.pdf.

(C) *Lived Experience*

Incorporating the lived experience (LE) of homelessness into program design and implementation is a commitment and framework to include everyone, especially people with lived experience, in planning, implementation and evaluation.

Lived Experience best practices included, but are not limited to:

- a) Bring the perspective of LE to the forefront by ensuring that no one is left out or misrepresented; ensuring that your organization’s communications, fundraising, research and programs do not reinforce the misconceptions that homelessness is caused by individual problems or can be solved by charity; using professional influence to help advance the goals identified by first voice people; and dedicating time and resourced to advocacy and supporting grassroots social change efforts.
- b) Include people with LE at all levels of the organization by hiring those with LE in positions at all levels within the organization; inviting those with LE to join the organization’s Board and committees; including LE as a dimension in your organization’s equity and diversity policies; creating liaisons within municipal governments to include city councils and police boards; and working towards sustainability and advancement for peer positions so that those hired on as peer counselors or peer researchers can advance to permanent positions.
- c) Value the time of those with LE and provide appropriate supports by anticipating the compensation required, and including that cost within your budget, of properly including people with LE; creating a welcoming environment in which it is safe to express emotions; provide training and capacity building to all members of the organization; and ensuring timeframes for LE initiates do things at a reasonable pace.
- d) Challenge stigma, confront oppression and promote dignity by providing training that addresses these issues to the whole organization; confronting oppression; educate around the intersectionality of racism, sexism, classism and ableism and how they work together and reinforce each other; and reviewing organizational policies and practices to ensure they promote equity, dignity and the rights of people facing homelessness.
- e) Recognize LE expertise and engage those with LE in decision making by mandating that people with LE are included in decision making roles in the organization and including those with LE in influential roles allowing them to speak when they can, use social media and other platforms and methods as they are available.
- f) Work together toward equitable representation by including equitable representation in the organization’s strategic planning process; setting concrete objectives and specific timeframes; working with other organizations that have successfully implemented equitable representation and evaluate your progress, seeking input from people with LE in the process.
- g) Build authentic relationships between with and without LE by cultivating an environment of caring, acceptance and openness where differences are celebrated and everyone’s contribution is acknowledged; ensuring that all members of the organization are included in social activities and that those activities are accessible to all; and breaking down rigid roles such as “service provider” and “service user”.

More information can be found at: <https://www.usich.gov/>. Search for “Lived Experience”.

(D) *Equity and Racial Justice*

OHCS is committed to advancing equity and racial justice in alignment with the Statewide Housing Plan and informed by national promising practices and lived experience of communities of color. OHCS and their grantees commit to an intentional, data-driven

approach to reduce disparities in housing and social service provision. Additional guidance and information continues to be developed to further identify how OHCS and grantees can advance equity and racial justice within state and federally funded programs.

More information can be found at the Performance Measure Requirements section of this manual and at <https://www.centerforsocialinclusion.org/our-work/our-four-strategies/>, <http://center4si.com/sparc/>, and <https://www.usich.gov/news/racial-equity-an-essential-component-of-our-nations-homelessness-response/>.

3. General Program Requirements

(A) *Release of Information*

Personally identifiable information is protected by federal laws (Privacy Act of 1974, as amended) and will be collected for the purpose of determining program eligibility, providing assistance/service, data collection, reporting and monitoring. Personally identifiable information ~~may~~will be shared with Oregon Housing and Community Services as is necessary to carry out the intent of an assistance or service program for the benefit of the person applying for such assistance or service and may be disclosed to Oregon Housing and Community Services without written authorization.

Clients may also be asked to sign a Release of Information; however, refusal to sign such authorization cannot be the basis for denying program services to otherwise eligible clients. Client refusal to sign a Release of Information does not negate the inclusion of personally identifiable information in secure reporting to Oregon Housing and Community Services. Oregon Housing and Community Services will de-identify client demographic data for the purposes of reporting. Under no circumstances will Oregon Housing and Community Services share personally identifiable information of clients served under this program.

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

(B) *Client Service or Housing Plan*

~~[ORS 458.528]~~

Development of a client service or housing plan is required for those clients receiving more than one-time only services. Plans are required to be client driven, using input and goal setting by the client. Warming/cooling shelters are excluded from this requirement. Existing and active service/housing plans with other providers may be used and amended for state-funded services.

(C) *Confidentiality*

Grantees and subrecipients must have policies and procedures that ensure all client information and records are secure and confidentially maintained. ~~—~~ Grantee and subgrantees officers, employees and agents must be aware of and comply with the grantees' and subgrantees' confidentiality policies and procedures.

Confidential records includes all applications, records, files, and communications relating to applicants for, and clients of, Tribal funded services.

Electronic collection of client information requires procedures for ensuring confidentiality including:

- Computer terminals must be located in a secure location, limiting access to only those persons who have a legitimate interest in and are responsible for client records;
- Computer monitors must be cleared (or a screen saver activated) immediately after accessing a client record;
- Computer terminals must be on a “locked” mode or turned off if the terminal is unattended; and
- Access to personally identifiable HMIS data shall be given to only authorized personnel as necessary for performing the work required for the Tribal funded programs.

Note to Domestic Violence Providers:

Grantees and subgrantees must have procedures that ensure the safety and security of program participants who are victims of domestic violence, including maintaining strict confidentiality of records. Additionally, the address and location of domestic violence shelter facilities must be protected from public disclosure except as authorized by the director of the organization responsible for operations of the shelter.

The confidential policy standards maintained by grantees and subgrantees must comply with all applicable local, state and federal requirements. All records shall be open for review to federal, state, and grantees’ auditors and/or examiners in the course of their regular audits and monitoring functions of Tribal-funded programs.

(D) *Service Termination or Denial of Assistance*

Grantees and subgrantees must have written termination, denial, and grievance policies and procedures. The policies and procedures should be readily available to program participants either at intake or by posting the policy in a public place. It is important to effectively communicate these policies and procedures to applicants/clients and ensure they are fully understood.

Grantees and subgrantees are required to provide **written notice** to applicants/clients when denied program assistance or assistance is terminated. The notice must include the specific reason(s) for the denial/termination and identify the steps to appeal the grantee’s and subgrantee’s decision.

(E) *Grievance and Appeals Process*

Grantees are required to have an established policy for addressing applicant/participant grievances/appeal requests. Grantees must ensure that subrecipients have policies that align with OHCS requirements and are consistent with the intent of such a policy as outlined by OHCS. Applicants/Participants must have the right and opportunity to

~~grieve/appeal any decision that terminates, denies, limits, reduces or modifies benefits for any reason. Applicants/Participants must be notified of their right for a grievance or appeal of such decision and subgrantee policy must clarify how and when applicants/participants are notified of their right to grieve/appeal decisions. Such grievance/appeal policy can be posted in a public place; however, applicants/participants must receive a written notification for any decision that terminates, denies, limits, reduces or modifies any benefit. Applicants/Participants must still receive a denial notice in writing even if the reason for denial is a subgrantee's/subrecipient's lack of funding. At a minimum, the policy must include the following components: Grantees and subgrantees are required to have an established, written process for addressing client grievances for decisions, including termination or reduction of benefit, denial of benefit or other grievance. At a minimum, the process must include the following components:~~

- Informs the participant/applicant of the policy and policy must be posted in general locations in which a client/applicant is expected to be;
- Informs the participant/applicant that they may contest any grantee's or ~~subgrantee's~~subgrantee's decision that denies (for any reason) or limits eligibility of participant/applicant and/or terminates or modifies any benefits and identifies the steps to follow to contest the decision;
- Allows any aggrieved person a minimum of thirty days to request an administrative review;
- Informs the applicant/participant of their right to present written or oral objections before a person other than the person (or a subordinate of that person) who made or approved the decision;
- ~~• Informs OHCS of the request for administrative review within 10 days of receiving the request; and~~
- Informs the applicant/participant ~~and OHCS~~ in writing of the final determination and basis for the decision within ten days of the determination.

Any person or persons designated by grantee and subgrantee can complete the administrative review, other than the person who made or approved the decision under review or a subordinate of this person. Grievance/appeal documentation should be retained on file by grantee in alignment with the "Records Retention" section of this manual.

Grantees and subgrantees must make accommodations for clients who have language or disability barriers that would prevent them from participating in the appeals process.

OHCS retains the right to require modification of any review or appeals process that in its determination does not meet basic principles for notification, instruction, time allowance, impartiality, access and other necessary components.

(F) *Nondiscrimination*

Grantees and subgrantees are required to comply with all state and federal statutes relating to nondiscrimination. Grantees and subgrantees may not take any of the following actions based on race, color, national origin, religion, gender, familial status or disability (federal) or marital status, sexual orientation, gender identity or source of income (state):

- Refuse to accept an application for housing assistance or services
- Deny an application for housing assistance or services
- Set different terms, conditions or privileges for housing assistance or services
- Provide different or specific housing, facilities or services
- Falsely deny that housing is available for inspection or rental or that services are available
- Deny anyone access to a facility or service.

The Fair Housing Act prohibits discrimination based on protected classes in the housing activities of advertising, screening and unit rentals. Using a target population in screening is allowed; however, refusal to accept application or provide information on services or available housing to any protected class, even if these groups do not fit into your targeting strategy, is prohibited.

Screening criteria cannot be discriminatory and must be consistently applied. For example, a provider might decide to give priority to clients who graduate from a tenant readiness education program that is inclusive of all protected classes. If two applications come in at the same time and both meet the screening criteria, the applicant who also has the tenant readiness education experience could receive priority over the applicant who does not; however, providers should always accept the first applicant meeting their criteria or prioritization policy.

For more information, see the [Guide to Fair Housing for Nonprofit Housing and Shelter Providers](#) produced by the Fair Housing Council of Oregon, or contact them directly at www.fhco.org.

(G) *Limited English Proficiency*

The Federal government has issued a series of policy documents, guides and regulations describing how grantee and subgrantee should address the needs of citizens who have limited English proficiency (LEP). The abbreviated definition of persons with limited English proficiency is those who: have difficulty reading, writing, speaking, or understanding English, and do not use English as their primary language.

Grantee and subgrantees must have a LEP policy document that describes the actions grantee and subgrantee took to identify LEP populations in their service area and define actions they will take to provide language assistance and address language barriers. The policy must also state how and how often staff will receive training about assisting LEP

persons, how the level of success of the policy will be identified and how changes will be made if needed.

Links to more information about Limited English Proficiency requirements are provided in the appendices “Applicable Rules and Regulations”.

Grantees and subgrantee should create a written Language Access Plan (LAP) to provide a framework to document how the agency’s programs will be accessible to all populations in their service area. Grantees and subgrantee who serve few persons needing LEP assistance may choose not to establish a LAP; however, the absence of a written LAP does not release grantee’s and subgrantee’s obligation to ensure LEP persons have access to programs or activities.

(H) Conflict of Interest

Grantee and subgrantee must keep records to show compliance with program conflict of interest requirements.

(1) Organizational

The provision of any type or amount of assistance may not be conditioned on an individual’s or household’s acceptance or occupancy of emergency shelter or housing owned by grantee, subgrantee, or an affiliated organization. Conflict of interest waivers regarding rent assistance and rental agreement requirements can only be approved by OHCS. If a grantee or subgrantee wishes to apply for a waiver, they should contact the OHCS homeless program analyst or manager for guidance in submission of a waiver request, which must be approved by OHCS.

A grantee and subgrantee may conduct a participant’s intake assessment to determine program eligibility if the participant resides in housing where the grantee or subgrantee has ownership interest for the expediency of housing placement services and to create seamless service delivery while keeping the client engaged in services. A waiver of the conflict of interest policy for this purpose is not required.

Grantees and subgrantees cannot steer potential renters to units owned or operated by the grantee or subgrantee, if the renters will be using a rent subsidy paid with any OHCS funds. Rent-subsidized tenants are free to enter into a rental contract with another landlord within the grantee or subgrantee’s jurisdiction or they may choose to rent a unit owned or operated by the grantee or subgrantee. A waiver request is not required for this situation; however, grantees and subgrantees must comply with this provision of the conflict of interest policy.

(2) Individual

For the procurement of goods and services, grantee and subgrantee must comply with the codes of conduct and conflict of interest requirements under 24 CFR 85.36 (for governments) or 24 CFR 84.42 (for private nonprofit organizations), notwithstanding that the Grant Funds do not consist of federal funds, to the extent that such provisions would apply of the Grant Funds consisted of federal funds.

Persons for whom the conflict of interest requirements apply include any person who is an employee, agent, consultant, officer or elected or appointed official of the grantee or subgrantee agency. No person who exercises or has exercised any functions or responsibilities with respect to activities assisted under the programs, or who is in a position to participate in decision-making processes or gain inside information with regard to activities assisted under the programs, may obtain a financial interest or benefit from an assisted activity; have a financial interest in any contract, subcontract or agreement with respect to an assisted activity; or have a financial interest in the proceeds derived from an assisted activity, either for him or herself or for those with whom he or she has a family or business tie, during his or her tenure or during the one-year period following his or her tenure.

(I) Monitoring

OHCS will conduct a program monitoring of grantees once per biennium or more frequently at OHCS’ discretion. Fiscal monitoring will be conducted annually unless circumstances require sooner at OHCS’ discretion. Grantees will be notified thirty (30) days in advance of the monitoring visit and informed of what documents and records will be reviewed and any required staff or Board interviews. OHCS will provide grantees with a written monitoring report inclusive of any findings, concerns or comments. Grantees are required to submit timely corrective action to findings and failure to do so may result in the withholding and/or return of funding to OHCS.

Grantees must notify and receive approval from OHCS when adding subgrantees and/or renewing subgrantees. Notification and approval normally occurs during the grant funding application process. However, if changes are made outside of the funding application, grantees must submit a grant activity amendment request form.

(J) Subrecipient Monitoring

Grantees must monitor their subgrantee organizations annually or as determined by OHCS. Subgrantee organization monitoring procedures must be in place and adequately ensure compliance with program requirements. Monitoring reports will be retained by the grantee and available for review by OHCS or other authorized entity.

All subgrantees must comply with all program rules and regulations as noted in this manual and the fully executed grant agreement.

4. Applicant Eligibility

| Applicant Eligibility | By and For Initiative – Native American Tribes of Oregon |
|-----------------------|--|
| Homeless Status | <ul style="list-style-type: none"> • Literally homeless • Imminent risk of homelessness • Homeless under other federal statutes • Fleeing domestic violence • Unstably housed |
| Income Requirement | No income requirements |

| | |
|-------------------------------|-----|
| Program Specific Requirements | N/A |
|-------------------------------|-----|

(A) *Household Composition*

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

(B) *Housing Status*

Homeless households are eligible to receive funded services. Eligible applicants for program services must meet one of the following categorical definitions of homeless or unstably housed and at risk of homelessness:

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

- Living in a primary nighttime residence that is a public or private place not designed for human habitation (including, but not exclusive to, a car, park, abandoned building, bus or train station, airport or camping ground);
 - Living in a publicly or privately operated shelter designated to provide temporary living arrangements (including congregate shelters, transitional shelter, and hotels or motels paid for by charitable organizations or by federal, state or local government programs);
- OR**
- Exiting an institution where he or she has resided for 90 days or less **AND** who resided in an emergency shelter or place not meant for human habitation immediately before entering that institution.

Category 2: Imminent Risk of Homelessness—Individual or family who will imminently lose their primary nighttime residence provided that:

- The primary nighttime residence will be lost within 21 days of the date of application for homeless assistance;
- No subsequent residence has been identified; **AND**
- The individual or family lacks the resources or support networks (e.g., family, friends, faith-based or other social networks) needed to obtain other permanent housing.

Category 3: Homeless Under Other Federal Statutes—Unaccompanied youth under 25 years of age, or families with children and youth, who do not otherwise qualify as homeless under this definition, (literally homeless, imminent risk of homelessness or fleeing/attempting to flee domestic violence) but who:

- Are defined as homeless under other listed federal statutes;
- Have not had a lease, ownership interest, or occupancy agreement in permanent housing during the 60 days prior to the program assistance application;
- Have experienced persistent instability as measured by two moves or more during the preceding 60 days; **AND**

- Can be expected to continue in such status for an extended period of time due to special needs or barriers.

Category 4: Fleeing/Attempting to Flee Domestic Violence—Individual or family who:

- Is fleeing, or is attempting to flee, domestic violence;
- Has no other safe residence; **AND**
- Lacks the resources or support networks to obtain other permanent housing.

Category 5: Unstably Housed—Individual or family who:

- Is at risk of losing their housing, and does not otherwise qualify as homeless under the above listed (1-4) categories, provided that:
- They have been notified to vacate current residence or otherwise demonstrate high risk* of losing current housing; **AND**
Lack the resources or support networks to obtain other permanent housing.

*High risk may be demonstrated by but is not solely defined as: having experienced a loss of income or other threat to housing stability. In addition, sharing housing of other persons due to loss of housing, economic hardship, or a similar reason (“doubled up”) may demonstrate a high risk of losing current housing. Owing rental arrears or not having the ability to pay for future rent may also demonstrate high risk status

(C) Income

There is no income eligibility requirement for BAFI-NATO assistance. ~~I,~~ the participant accessing services must be eligible according to their housing status as indicated above.

(D) Citizenship and Residency

There is no client citizenship or residency requirement to be eligible for BAFI-NATO- funded assistance.

(E) Eligibility Documentation

(1) Documentation of all client/applicant eligibility information must be available in client/applicant files or if kept electronically, available upon request in the format requested. Documentation of all efforts to obtain higher preference of verification (3rd party and Intake Worker Observation) when lower forms of preference are used, must be in writing and kept in the client/applicant file. Third party documentation is a requirement for payment of mortgage assistance.

(2) **Remote Application and Documentation**

The standard preference is for applicants to apply for assistance in person or to have in-person contact with the grantee or subgrantee throughout the application and service delivery process. A remote application and documentation process may be used when necessitated.

Applicants who apply for assistance and provide eligibility documentation remotely may do so via electronic and other communication; e.g., phone, email, text, electronic messaging, mail and other electronic or remote means. The documentation must be kept in the client file.

Grantees and subgrantees are required to develop and maintain policies and procedures for the use of a remote application and eligibility documentation process and available for review by OHCS, upon request. Such policies and procedures must be applied equally across services that use or are supported by the funding.

These policies and procedures must address the following elements:

- a) In what circumstances a remote application and documentation process will be used;
- b) Verification of the identity of the applicant;
- c) Verification and documentation of qualification for assistance in relation to program eligibility criteria;
- d) Verification and documentation as appropriate for ongoing demonstration of eligibility;
- e) Notification and documentation to client in relation to release of information, service denial or termination and grievance and appeal requirements.

(3) **Order of Preference**

OHCS requires program staff to comply with the following general documentation standards listed in order of preference:

- **Third-party documentation**, where it is available, is the preferable form of documentation. Third party documentation includes verification from an employer, landlord, public benefit worker, agency service provider, etc. Written verification sent directly to program staff or via the applicant is preferred.
- **Intake Worker Observation** may include oral statements made by a social worker, case manager, or other appropriate official at an institution, shelter, or other facility and documented by the Intake Worker. When the Intake Worker is unable to obtain a written or oral statement from a shelter, institution or facility staff, the Intake Worker must document, in writing, their efforts to obtain eligibility documentation and must place their documentation in the client's file.
- **Applicant Self-Certification** requires a written and signed document by the individual or head of household seeking assistance attesting to the facts for which they are certifying. A third-party may be designated by an applicant to sign documents on their behalf when they are unable to do so. It is the responsibility of the subgrantee and subrecipient to provide access to language interpretation

services and assistive devices necessary for applicants to understand the documents they are certifying.

5. Allowable Program Components and Expenditures

Documentation of allowable program components and expenditures must identify how an expense or service helped a client maintain or attain permanent housing.

Funding can be used in one or more of the following eight program components:

- (A) [Street Outreach](#)
- (B) [Emergency & Transitional Shelter](#)
 - a. Shelter and Facility Operations (inclusive of motel/hotel vouchers)
 - b. Shelter Resident Support Services
- (C) [Transitional Housing](#)
- (D) [Homelessness Prevention & Rapid Re-Housing](#)
- (E) [Supportive Housing](#)
- (F) [Eviction Prevention and Diversion](#)
- (G) [Shelter or Transitional Housing Facilities Acquisition. Rehab/Conversion](#)
- (H) [Capacity Building](#)
- (I) [Data Collection](#)

(A) **Street Outreach**

Funds can pay for street outreach services for the specific purpose of reaching out to unsheltered homeless people; connecting them with emergency shelter, housing, or critical services; and providing urgent, non-facility-based care. OHCS encourages the use of multi-disciplinary approaches and partnerships with culturally specific, healthcare-focused or other specialty outreach services. Leveraging various fund sources to pay for health services, such as through Medicaid, should be explored whenever possible. It is expected that any health professionals providing specialty outreach services have proper credentialing and licensure through relevant governing bodies (e.g., OHA, MHACBO). Eligible outreach services include, but are not exclusive to:

- (a) Conducting an initial assessment of applicant basic needs and eligibility;
- (b) Providing crisis counseling;
- (c) Addressing urgent physical needs, such as providing meals, blankets, clothes, or toiletries;
- (d) Actively assessing, connecting and providing information and referrals to needed services, including emergency health and mental health services;

- (e) Cost of outreach ~~including~~ ~~including~~, but not limited to, marketing and outreach materials, translation and interpretation services and cell phone costs of outreach workers, etc.;
- (f) Case management activities;
- (g) Emergency health services to the extent that other appropriate services and treatment are unavailable or inaccessible within the community;
- (h) Emergency behavioral health services to the extent that other appropriate services and treatment are unavailable or inaccessible within the community; and
- (i) Travel expenses incurred by outreach workers, social workers, medical professionals or other service agency employees during the provision of allowable street outreach services.

(B) *Emergency and Transitional Shelter*

(1) Shelter Facility Operations

Funds can pay for the costs of maintaining and operating **Emergency or Transitional Shelter** facilities whose primary purpose is to provide temporary or transitional shelter to the general homeless or specific populations of the homeless. Hotel/Motel vouchers can be used as an emergency shelter strategy when there is a lack of available emergency shelters in the subgrantee's/subrecipient's service area. Eligible shelter facility operations costs include, but are not exclusive to:

- (a) Lease or rent payments for shelter facility;
- (b) Utilities (includes water, sewer, garbage, gas, electricity, internet, phone) for shelter facility;
- (c) Security equipment or service to operate shelter facility;
- (d) Janitorial supplies and service to operate shelter facility;
- (e) Facility management;
- (f) Repairs to facility (for rehabilitation or conversion costs see Section 5F of this manual);
- (g) Furnishings for shelter facility; and
- (h) Hotel/Motel vouchers for clients.

(2) Shelter Resident Support Services

Funds can pay to meet the essential needs of shelter residents to facilitate transition out of shelter into more stable housing. Support services must be made available to households that receive hotel or motel vouchers to ensure quick and successful transition to more stable housing. Eligible support service costs include, but are not exclusive to, at the discretion of the grantee or subgrantee case manager:

- (a) Intake and case management including pre-eligibility determination for housing and other needed services;
- (b) Housing relocation (e.g., first and last month's rent payments and arrearages, manufactured home rental space "lot rent", application fee, security deposit, utility deposit);

- (c) Purchase of identification and driver's license;
- (d) Purchase of birth certificates;
- (e) Credit repair assistance (not debt payment);
- (f) Tenant readiness education;
- (g) Food and clothing;
- (h) Crisis intervention/counseling;
- (i) Transportation;
- (j) Costs to board and care for shelter residents' animals, such as boarding costs, kennels, leashes, veterinary services, food, toys, etc. Subgrantees must have an animal policy in place to ensure the safety and welfare of all residents and provide it to OHCS upon request; and
- (k) Client direct services.

(C) *Transitional Housing*

Funds can pay for temporary housing and services intended to facilitate a homeless household's transition to permanent housing within a reasonable amount of time (usually less than 24 months). Transitional Housing is designed to provide interim support to successfully move to and maintain permanent housing and will require program participants to sign either a lease or an occupancy agreement.

Eligible services include, but are not exclusive to:

- (1) Transitional housing operational costs such as rent, maintenance, security, utilities (includes water, sewer, garbage, gas, electricity, internet, phone);
- (2) Rent subsidy;
- (3) Housing relocation assistance, including staff time locating permanent housing and related upfront housing costs, such as application fees, moving costs, deposits;
- (4) Support services, such as purchase of birth certificates, identification and driver's license; credit repair assistance (not debt payment), tenant readiness education, food and clothing, crisis intervention/counseling, transportation, direct client services;
- (5) Case management; and
- (6) Education and training in such areas as personal finance and budgeting, job search and access to job training, and literacy.

(D) *Homelessness Prevention and Rapid Re-Housing*

Funds can pay for rapid re-housing and homeless prevention services to enable households who are at imminent risk of homelessness or unstably housed to regain stability in their current housing or enable households who are literally homeless to transition directly to permanent housing.

Eligible homelessness prevention and rapid re-housing services include, but are not exclusive to:

- (1) Rental assistance, late fees, and rent arrearages;
- (2) Utility arrears (includes water, sewer, garbage, gas, electricity, phone, and internet);
- (3) Housing costs such as mortgage/manufactured home payments, ~~and~~ arrearages, and property taxes. Any payment of property taxes should document imminent risk of foreclosure. (limited to 3 months);
- (4) Manufactured home rent space “lot rent” or RV space lot for primary housing;
- (5) Security deposits, moving expenses, application fees, pet rent, pet deposits, and other housing expenses;
- (6) Late fees, court fees, utility reconnection fees etc.;
- (7) Client direct services;
- (8) Case management and housing relocation assistance;
- (9) Work Supports – (i.e., training costs; transportation assistance – bus tokens, ride sharing, auto repair; childcare or eldercare costs, clothing to support employment needs). The purpose of the work supports is to allow the household to stabilize by avoiding costs or expenses in other areas that are a barrier to housing stability;
- (10) Housing Counseling;
- (11) Wrap-around case management (including retention support after initial intervention);
- (12) Staffing for housing retention and wrap-around case management services; and
- (13) Furniture and household goods to support a household with moving to a new home.
- (14) Minor Home Repairs (HP Only)

| <u>Expense</u> | <u>HP Allowable</u> | <u>RRH Allowable</u> |
|--|---------------------|----------------------|
| <u>Housing costs such as mortgage/manufactured home payments, arrearages, and property taxes</u> | <u>X</u> | |
| <u>Housing costs such as rent payments and security deposit (inclusive of first, last, pet rent, and if accepted by landlord as an incentive, forward rent), and late fees</u> | <u>X</u> | <u>X</u> |
| <u>Rent arrears</u> | <u>X</u> | |
| <u>Rental-related expenses</u> | <u>X</u> | <u>X</u> |
| <u>Rent/Lease-to-Own payments</u> | <u>X</u> | |
| <u>Manufactured home rental space “lot rent” or RV space lot if used for primary housing</u> | <u>X</u> | <u>X</u> |
| <u>Utility payments and arrearages (utilities include water, sewer, garbage, gas, electricity, phone, internet)</u> | <u>X</u> | <u>X</u> |

| | | |
|--|----------|----------|
| <u>Moving costs (van/truck rental)</u> | <u>X</u> | <u>X</u> |
| <u>Storage costs</u> | <u>X</u> | <u>X</u> |
| <u>Utilities deposits</u> | | <u>X</u> |
| <u>Pet deposit, limited to one pet per household</u> | | <u>X</u> |
| <u>Application fees</u> | | <u>X</u> |
| <u>Minor Home Repairs</u> | <u>X</u> | |
| <u>Transportation costs, such as bus/train passes, gas vouchers, Uber/Lift/Cab fares, car repair/insurance</u> | <u>X</u> | <u>X</u> |

(13)

(E) Supportive Housing

Funds allow grantees and supportive housing ~~developers~~/operators offering services to their residents, to utilize the grant for leasing activities, utilities, maintenance, repairs, supportive services, and overall operations of supportive housing sites. The planning aspect includes capacity building ~~and development~~ costs associated with supportive housing sites but EXCLUDES the ability to use the funds for acquiring, rehabilitating, or converting existing sites.

- (1) Services and Case management
 - a. Wrap around case management services;
 - b. Referrals to resources and education (employment training, financial counseling, youth, health, and tenant) programs.
- (2) Planning
 - a. Funds can be used to support the planning ~~and development~~ of future supportive housing sites through surveys, partnerships, consultants, and technical assistance services.

Funds CANNOT be used to acquire, rehabilitate, or convert existing structures to affordable or permanent supportive housing sites.

(F) Eviction Prevention and Diversion

Funds may be used for diversion activities to support households that have received an eviction notice. Eligible expenses include but are not exclusive to:

- (1) Court navigation staffing costs;
- (2) Legal expenses related to eviction or housing needs (legal advice, representation, and other services);
- (3) Landlord/Tenant Mediation services;
- (4) Program staff;

- (5) Transportation to court (Uber, Lyft, Bus Tickets, etc.) and;
- (6) Paying for costs related to helping a client access another housing resource (EHV vouchers, HCV, OERAP, etc.).

(G) Shelter or Transitional Housing Facilities Acquisition, Rehab/Conversion

Funds can be used for the acquisition, rehab or conversion of emergency shelter and transitional housing for households who are homeless or unstably housed and at risk of homelessness. Use of funding for acquisition, rehab or conversion must follow the guidance indicated in this section. If you have any additional questions, please contact your OHCS Program Analyst.

Distinguishing Between Maintenance and Renovation (Rehab/Conversion)

Where allowable, funds under OHCS state-funded programs can be used for the category of Shelter Operations, which refers to “Repairs to facility”. This is meant to define minor or routine repairs.

Distinguishing between maintenance activities and more extensive repair and rehabilitation activities requires careful consideration. This information provided will assist in determining whether an activity is maintenance and therefore exempt from further environmental review, or, if it is rehabilitation and therefore requires further environmental review.

In general, maintenance activities slow or halt deterioration of a building and do not materially add to its value or adapt it to new uses. Sometimes, maintenance of a building feature or system requires periodic replacement of individual component parts that are subject to normal wear and tear. While maintenance is often budgeted as an operating expense, and repairs and rehabilitation are treated as capital expenses, it is the nature of the activity itself, not its budget category that determines whether it qualifies as maintenance. Simultaneous maintenance work in multiple units or buildings is still considered maintenance.

For environmental review purposes, deferred maintenance that has resulted in a need for extensive repairs and rehabilitation does not qualify as maintenance. If items that would otherwise be considered maintenance are done as part of an extensive remodeling or renovation of a building that amounts to rehabilitation, the entire job is considered rehabilitation. Depending on the extent of damage, activities performed after a disaster event will typically not be considered maintenance.

Shelter Operations: Maintenance

In general, maintenance activities include: cleaning; minor or routine repairs of furnishing, equipment, and fixtures not permanently affixed to the building; protective or preventative measures to keep a building, its systems, and its grounds

in working order; periodic replacement of a limited number of component parts of a building feature or system that are subject to normal wear and tear; and replacement of a damaged or malfunctioning component part of a building feature or system. Replacement of all or most parts or an entire system is not maintenance. Maintenance activities:

- Do not materially add to the value of the building/property;
- Do not appreciably prolong the useful life of the building/property; and
- Do not adapt the building/property to new uses.

See the Table in the Appendix of the program’s operational manual for specific examples of maintenance activities.

The minimum period of use for maintenance activities is the same as for other shelter operations and essential services activities—that is, the recipient/subgrantee must provide services or shelter to homeless individuals and families at least for the period during which OHCS funds are provided (for example, the contract period specified in a subgrantee contract/agreement). Again, maintenance activities are not subject to environmental review

Renovation and Conversion

In general, an activity that **does** materially add to the value of the building, appreciably prolong its useful life, or adapt it to new uses would be considered renovation or conversion.

See the Table in the Appendix of the program’s operational manual for specific examples of renovation and conversion activities.

When the activity is renovation, rehabilitation or conversion, the scope of the environmental review may be limited if the work is minor and does not involve ground disturbance. Consult Regional Environmental Officers, Field Environmental Officers, and Program Environmental Clearance Officers for information and examples of Environmental Review Record documentation for limited reviews. The scope of an environmental review relates to the nature and extent of the rehabilitation activities. Some activities, especially those limited to interior spaces, may not have the potential to affect the natural environment, and therefore not require analysis under some of the related laws and authorities like those addressing Wild and Scenic Rivers, Endangered Species, Farmland Protection, or Protection of Wetlands. A reviewer can quickly document such instances in the Environmental Review Record, and focus effort and further analysis on those environmental areas that may be impacted by a project. In residential rehabilitation, those typically include Floodplain Management, Historic Preservation, Noise Abatement, Toxic Chemicals and Radioactive Materials. Historic Preservation review (Section 106) may be expedited through Programmatic Agreements and other program alternatives.

It is also possible to group multiple years of expected activities into one environmental review. For instance, rehabilitation activities could be outlined in a 5-year environmental review for a property and be reviewed once, without requiring individual reviews each time a single activity occurs during the time period.

Depending on the cost of the renovation and value of the building, it might be considered minor rehabilitation or major rehabilitation (see below).

Renovation costs can include architect’s fees, engineering costs, permits, and other costs of a renovation or conversion project when they are reasonable and appropriate, and directly related to the renovation or conversion project. Renovation includes four separate activities. The chart below shows each activity, the definition, the minimum period of use requirement, and the level of environmental review for each. Note that for renovation and conversion activities, the minimum period of use starts on the date the building is first occupied by homeless individuals or families after the renovation or, if the building is occupied during the renovation, the period of use starts on the date the renovation is completed.

| Type of Renovation Activities | Definition | Minimum Period of Use | Level of Environmental Review Required |
|-------------------------------|--|-----------------------|--|
| Minor Rehabilitation | The cost of the rehabilitation of an existing emergency shelter is 75% or less of the value of the building before rehabilitation* | 3 Years | Generally Categorically Excluded |
| Major Rehabilitation | The cost of the rehabilitation of an existing emergency shelter exceeds 75% of the value of the building before rehabilitation* | 10 Years | Environmental Assessment (can require an Environmental Impact Statement (EIS)) |
| Minor Conversion | The cost of the conversion of a building to an emergency shelter is 75% or less of the value of the building after conversion* | 3 Years | Environmental Assessment (can require an Environmental Impact Statement (EIS)) |
| Major Conversion | The cost of the conversion of a building to an emergency shelter exceeds 75% of the value of the building after conversion* | 10 Years | Environmental Assessment (can require an Environmental Impact Statement (EIS)) |

* The value of the building is the reasonable monetary value assigned to the building, e.g., by an independent real estate appraiser.

Shelter or Transitional Housing Facilities Acquisition, Rehab/Conversion

[Refer to your Subgrantee Contract/Agreement for Procurement requirements]

Where allowable, funds under OHCS state-funded programs can be used for the categories of acquisition and rehab/conversion (encompasses rehabilitation, renovation, and conversion), of emergency shelter and transitional housing for households who are homeless. Projects using targeted funds must ensure that funds exclusively serve the target population. Where the program requires, client eligibility applies. For OHCS-funded programs, acquisition of land must also include a building structure to be used. Acquisition of bare land is not an eligible use of funds.

Free Standing Temporary Shelter

Free-Standing Temporary Shelter (FSTS), also known as tiny homes and pallet shelters, are a type of alternative shelters allowed under the definition of Shelter Acquisition as an equipment purchase. This includes “new construction” of shelter. Prior OHCS approval of the purchase of FSTS is not the same as the OHCS Acquisition/Rehab/Renovation process. The process to receive approval for the purpose of Free- Standing Temporary Shelters is to complete a FSTS pre-approval application, located on the HSS Dashboard, which is targeted for different types of subgrantee contract/agreement. The application includes completing information on your purchase process, site location, amenities on site which is inclusive of utilities, waste management, food service, and public safety strategy, as well as your shelter operation plan. Funds used for the purchase of FSTS must be allocated to the acquisition category of your OHCS grant; however, ongoing operation of FSTS already placed in service may be allocated to the shelter operations category of your OHCS grant, if an allowable expense.

For information and instruction and a How To Guide on Building a Shelter Community, visit www.palletshelter.com.

Acquisition, Rehabilitation, Renovation or Conversion Instructions

A project description with allowable costs, and following grantee contract/agreement rules, must be provided to OHCS in the form and format requested, if needed, and activities for this purpose carry additional requirements as identified below:

Restrictive Use Period

The Restrictive Use Period for the OHCS-funded acquisition, rehabilitation, conversion and/or renovation is dependent on use of funds and is 10 years for all acquisition. The Restrictive Use Period runs from December 31 of the year the first building in the Project is placed in service or until December 31, [Year of PIS + # of years appropriate for use], whichever is later. The project owner must agree to annually certify compliance with this requirement and submit that certification to OHCS at hss.acq.rehab@hcs.oregon.gov.

| Rehabilitation and Renovation Minimum Period of Use | | |
|---|------------------------|--|
| | Use Requirement | Determining Criteria |
| Major Rehabilitation | 10 years | Rehab costs exceed 75% of the value of the building before rehabilitation. |
| Conversion | 10 years | Conversion costs exceed 75% of the value of the building after conversion. |
| Renovation, including rehab and conversion costs that do not meet 10 Year criteria. | 3 years | Renovation costs are 75% or less of the value of the building before renovation. |

Contracted Oversight

Architectural: All rehab, conversion or renovation concepts must be reviewed and approved by an architect of grantee’s choosing. For any rehab, conversion or renovation activity costing more than \$30,000, or if any internal or external doors, windows or walls will be added, removed, or moved, the project must hire an architect of record to develop the construction documents.

General Contractor: For any construction costing more than \$50,000 or involving three or more trade specialties, the project must hire a general contractor.

Period of Fund Availability

All project costs to be paid with OHCS funds must be incurred on or before the last day of the biennium in which the allocation was made.

Use of HMIS

Except for Domestic Violence victims, project owner will be required to enter data into an approved HMIS system for all persons assisted in an OHCS-funded shelter or transitional housing unit. Domestic Violence providers must collect client data in a database comparable but separate from the grantee’s HMIS database and must report client-blind data to the subgrantee. Grantee must participate in OHCS’s required data reporting process, complying with all information requests and reporting deadlines.

Procurement Requirements

Grantees must follow procurement requirements as outlined in the grantee contract/agreement.

OHCS Anti-Displacement and Relocation Assistance Policy

OHCS-funded acquisition should not cause the involuntary displacement of tenants.

OHCS encourages subgrantees to pursue projects that will not permanently displace tenants. If applicable, Grantee will provide OHCS, submitted at hss.acq.rehab@hcs.oregon.gov, with a description of the relocation plan and whether existing residents will have opportunity to return to the facility, as well as any permanent relocation. Grantee's description shall include the kind of advance notice that will be given to affected tenants; and what funding the subgrantee will provide to assist persons being relocated. Grantee must comply with any laws addressing tenant protections and evictions.

OHCS Fiscal Monitoring

OHCS fiscal monitoring requirements for acquisition and/or rehab/construction projects are the same as fiscal monitoring of other costs incurred. Grantee must maintain a project file available for review during the monitor's visit or at the monitor's direct request.

Quarterly Progress Report

A standardized Quarterly Progress Report form must be submitted first, by the 10th day of the month following the month the project began and then quarterly thereafter, due by the 10th day the month following the quarter being reported. Reporting must begin for the month following the date of the first expense of OHCS funds is incurred and must continue quarterly until the project can be reported "in use" (shelter) or "occupied" (housing). During all quarter when the grantee will be requesting funds from OHCS, the Quarterly Progress Report must include detail of the project work completed during that quarter and the percentage of completion achieved to date until the project is complete and placed into service. The Quarterly Progress Report form is available on the OHCS HSS Dashboard:

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

First Year Report

At the end of the first calendar year the project was placed in service, grantee will be asked to provide OHCS with a year-end narrative report describing the project and how it is being used in the community. The First Year Report form is available on the OHCS HSS Dashboard: <https://app.smartsheet.com/b/publish?EQBCT=8a215621578a4f76ae98113d719d5e64>.

Annual Certificate of Continuing Program Compliance

A Certificate of Continuing Program Compliance will be required from the grantee for the previous year. Subgrantee will use the Certificate to confirm the operation of the project is in compliance with the restrictive use requirements. The Certificate form is available on the OHCS HSS Dashboard at: <https://app.smartsheet.com/b/publish?EQBCT=8a215621578a4f76ae98113d719d5e64>.

Environmental Review

Grantee must complete the appropriate Environmental Assessment or Environmental Impact Statement. Such environmental review must be performed by the responsible entity. The responsible entity must be the unit of general local government within which the project is located that exercises land use responsibility. Such review must be submitted to OHCS at: hss.acq.rehab@hcs.oregon.gov.

Certificate of Occupancy

Grantee must submit a Certificate of Occupancy signed by their local jurisdiction upon completion of the project. The Certificate of Occupancy must be submitted to OHCS at: hss.acq.rehab@hcs.oregon.gov.

Grantee's Responsibilities for Subgrantees

OHCS will only fund the acquisition of property if that property will be owned by the grantee. OHCS will fund rehabilitation in a property owned by a grantee or a subgrantee of the grantee. OHCS will always allocate the OHCS funds to the grantee, not the subgrantee. All requirements of the grant agreements, program guidelines apply and the grantee will be held responsible to ensure all requirements are met by the subgrantee and its vendors. Subgrantees cannot own equipment purchased with OHCS funds. Any equipment must be owned by the grantee only and the purchase process must conform to grant agreement/contract procurement requirements.

Repurposing the Property

Grantee may determine the community's housing needs have changed and the current use of the property is no longer in high demand. The project owner may be allowed to repurpose the use of the property before the end of a restrictive use period by obtaining prior written approval from OHCS. The eligibility restrictions required by the original funding source must apply. To discuss repurposing, the grantee must contact the HSS program analyst.

Transferring Property Ownership

Within the Restrictive Use Period, the project owner may not transfer, sell, assign, bequeath, or dispose of any interest in the project to any person, entity or other assignee, without obtaining the prior written consent of OHCS. The proposed use of any monies gained from the transaction must be pre-approved in writing by OHCS.

Checklist of Steps to Follow

File review is the basis for OHCS monitoring. Subgrantee must keep a complete file of all project requirements for 6 years following the final year of the restrictive use period. Follow these steps to ensure you are in compliance with the rules and regulations for using OHCS for Acquisition, Rehabilitation, Renovation or Conversion:

- 1) Read through all these materials to ensure you understand the requirements that apply to your project and your responsibilities.
- 2) Before drawing your first request for funds, ensure that OHCS has received your

first completed Quarterly Progress Report.

- 3) If required, ensure that the performance of an Environmental Review is complete and submitted to OHCS.
- 4) By the 10th day of the month following each month being reported until the project is placed into service, submit to OHCS a completed Quarterly Progress Report.
- 5) By the end of the first calendar year that the project is placed in service, submit to OHCS a completed First Year Report.
- 6) Upon completion of the project and prior to placing the project in service, submit to OHCS a completed Certificate of Occupancy.
- 7) By January 20th of each year after the project is placed into service and for the duration of the applicable restrictive use period, submit to OHCS a completed Annual Certificate of Continuing Program Compliance

(H) Capacity Building

Funds can be used for planning of programs by contracting with consultants and technical assistance experts to assist with the planning and creation of policies and processes for development.

Capacity Building allows the Tribes to work collaboratively with partners to provide wrap-around services, strengthen networks, and support a variety of services that will allow individuals and families to obtain and remain stably housed.

Allowable activities include, but are not exclusive to:

- (1) Increase the number of shelter beds;
- (2) Expand partnerships and supports in the region;
- (3) Coordinate with stakeholders, initiatives, and partnerships;
- (4) Pay stipends to engage and obtain feedback from people with lived experience;
- (5) Landlord incentives and engagement;
- (6) Landlord outreach.

(I) Data Collection

Funds may be used to support staff and related costs necessary to collect and report shelter bed nights, client services, client demographic data, performance outcomes and other reporting requirements. Eligible data collection costs include, but are not exclusive to:

- (1) HMIS licenses;
- ~~(2) Data entry; (Now a case management expense)~~
- ~~(3)~~(2) Equipment upgrade;
- ~~(4)~~(3) Network systems upgrade (it is recommended that systems be networked); and
- ~~(5)~~(4) Staff training.

(J) *Determining Duration and Amount of Assistance Provided*

Excluding rent arrears, the amount of assistance provided must be the least amount needed to stabilize clients in their permanent housing. Grantees and subgrantee have the discretion to further set a maximum number of months that a client may receive assistance and the maximum dollar amount of assistance. The process for determining such conditions must be applied consistently for all households, incorporated into the grantee's and subgrantee's policies and procedures and communicated in advance to eligible clients.

(K) *Gift Cards*

Gift cards given to eligible clients for the purpose of purchasing items in support of the client's housing goals is allowable provided that adequate documentation exists to support the expense and there are established policies and procedure in place to address the process. The cost must be allocable, within program guidelines and must adhere to internal controls (OMB 200.403, 200.303), to the extent applicable if the Grant Funds consisted of federal funds, notwithstanding that the Grant Funds do not consist of federal funds). Procurement policies must be followed for the purchase of gift cards. Gift cards must be purchased and issued to clients within the same grant period. For any gift cards that are not issued within the same grant period in which they were purchased, grantees must submit a negative request for funds for the grant period in which the gift card was purchased totaling the amount of the unissued gift cards.

Grantees must receive prior approval and identify:

- (1) Dollar amount limitation;
- (2) Intent of use (why a gift card versus other funding or other payment format);
- (3) Connection to housing stability (how housing goals are supported by the provision of gift cards);
- (4) Oversight/approval (how oversight is performed; approval process); and
- (5) Proper tracking processes to include inventory management and security of gift cards.

Under Client Direct Services, gift cards may be used when:

- (1) Grantee has received prior approval of their gift card policy from OHCS and;
- (2) Issuance of a gift card is in the context of an action plan or goal designed to increase housing stability or meet other essential needs;
- (3) Issuance of a gift card is not for any purpose prohibited by OMB 200.403, 200.303, Federal, State, County or other program rules and regulations (such federal rules and regulations applicable to the extent they would apply if the Grant Funds consisted of federal funds, notwithstanding that the Grant Funds do not consist of federal funds);
- (4) Grantees and subgrantee maintain complete records and accounting of gift cards;
- (5) Clients are provided a copy of the agency gift card policy; and
- (6) Clients sign the gift card policy acknowledging they understand the gift card policy and acknowledge the receipt of the gift card.

6. Financial Management

(A) **Administration Costs (Direct and Indirect)**

There is an expectation that administrative funds will be shared with subgrantees commensurate to the services provided through the program by subgrantees.

(B) **Use of OPUS**

The OPUS System is a web-based centralized data system designed to meet business-processing needs. Grantee staff must complete training before being authorized to use the fiscal operations program of OPUS. Training can be provided by the Fiscal Grant Specialist at OHCS.

OHCS maintains an OPUS Manual and OPUS Help Desk. Staff can be reached at:

Email: opushelp@oregon.gov

Ph: (503) 986-2099

Toll Free: (800) 453-5511 Option 6

(C) **Request for Funding Documentation**

Grantees must retain supporting documentation of all costs charged to the applicable grant and be able to provide evidence that grant funds were spent on allowable costs. When grantee submits a Request for Funds (RFF) on OPUS, they are required to download documentation of the costs for which they are requesting payment. Any RFF submitted without accompanying documentation or with insufficient documentation will be returned to the grantee with instructions to provide additional information.

(D) **Budget Change Requests and Project Amendments**

Changes in a grantee's scope of work may necessitate the submission of a budget change request. All budget changes require OHCS approval by submitting a Budget Change Request form electronically to: mga.fiscal@oregon.gov.

At the discretion of OHCS, additional information or a Project Amendment Request form may be required for a budget change request.

Project Amendments are required when there is a shift in program delivery and/or scope of work. All Project Amendments require OHCS written approval by submitting a request through the appropriate Smartsheet form.

Grantees must notify, within 30 days, and receive written approval from OHCS when adding subgrantees. Notification and approval normally occurs during the Tribal funding application process; however, if changes are made outside of the application, grantees must notify OHCS and obtain approval by submitting an Project Amendment Request through the appropriate Smartsheet form.

(E) **Funds Spend Down**

Grantees are expected to fully obligate or expend grant funds during each funding cycle in accordance with OHCS policy. OHCS will review grantee's grant spending in accordance with Grant Agreement and OHCS policy. Contact your OHCS Program Analyst for any questions

regarding your expenditure of funds. Grantees can request an advance of funding for approved budget items. The policy can be found at <https://www.oregon.gov/ohcs/for-providers/Documents/manuals/Advance-Funds-Req.pdf>.

(F) Procurement

Purchases of equipment or property are subject to additional provisions and requirements as stated in the Grant Agreement Standard Terms and Conditions and Special Provisions exhibits. Fixed assets include computer equipment, electronic equipment, photography equipment, hand tools and other items. Title to all equipment purchased in whole or part with OHCS funds must be in the name and possession of the grantee. Grantee shall prohibit its subgrantees from using OHCS funds to purchase equipment. Disposal of any item having an original cost of more than \$5,000, and which is currently valued above \$5,000, requires prior OHCS written consent. Property and equipment purchased with OHCS grants shall not be used for collateral or to secure financing.

Purchasing contracted services should only occur when the skills, knowledge and resources are not available within grantee's organization or is unable to complete the work within require time limitations. A contractor must be registered to do business in Oregon and have necessary credentials of expertise. Regarding bids, pricing, and sole source contracting for purchasing these services, Grantee is expected to follow their own established internal procurement processes and procedures. ~~obtain multiple bids or pricing. If using a sole source contract, grantee must have written documentation to explain why they were not able to obtain more options.~~

7. Data Requirements

(A) Data Entry

Grantees and their subgrantees are required to enter client and service data into the ServicePoint Homeless Management Information System (HMIS), except for data of victims of domestic violence clients, which must be entered into a comparable database that meets HMIS standards. Projects serving survivors of domestic violence where the operator is not a victim services provider are required to enter data in their HMIS. Grantees and subgrantees are responsible for acquiring and documenting informed written consent from program participants, and protecting program participant's confidentiality.

Additional guides and assistance with HMIS data entry, data quality and reporting may be found on our website at: <https://www.oregon.gov/ohcs/for-providers/Pages/hmis.aspx>.

(B) Data Timeliness

Timely and accurate data entry is critical to ensuring meaningful data analysis and reporting. Therefore, it is recommended that grantees and subgrantees enter data within three business days.

(C) Data Entry Requirements for Shelters

Emergency or transitional shelters, day or mass shelters, or hotel/motel vouchers are required to collect data and report outcomes using the Entry/Exit method of data collection within HMIS. Service Transaction records are required for other program components.

Regardless of the method used to track shelter use, grantees and subgrantees must be able to determine who and how many people were served by a shelter or shelter type for any given night, based on HMIS data.

(D) Required Data Elements

HMIS Universal and OHCS-required Data Elements that must be collected are categorized by Program and can be found at the following link:

<https://www.oregon.gov/ohcs/for-providers/Documents/form/Data-Coll-Rqmts-By-Program-and-Project-Type.pdf>

~~HMIS Universal and OHCS-required Data Elements that must be collected for ALL programs include, but are not limited to:~~

- ~~1. Name~~
- ~~2. Social Security Number~~
- ~~3. Date of Birth~~
- ~~4. Race/Race Additional~~
- ~~5. Ethnicity~~
- ~~6. Gender~~
- ~~7. Veteran Status~~
- ~~8. Disabling Condition~~
- ~~9. Current Living Situation~~
- ~~10. Prior Living Situation~~
- ~~11. Project Start Date~~
- ~~12. Project Exit Date~~
- ~~13. Destination~~
- ~~14. Relationship to Head of Household~~
- ~~15. Client Location~~
- ~~16. Current County of Residence (for CAAs that cover more than one county)~~
- ~~17. Domestic Violence Victim/Survivor~~

~~Additional Elements collected on Transitional Housing, Rapid Re-Housing and Homelessness Prevention~~








- ~~18. Income and Sources~~
- ~~19. Non-Cash Benefits~~
- ~~20. Health Insurance~~
- ~~21. Disability Type~~
- ~~22. Percent of AMI~~
- ~~23. Housing Move-In Date~~

~~24. Direct Service Costs (monthly rent payment)~~

~~(E) **Referral Tracking**~~

~~Grantees and their subgrantees are encouraged to track referrals made to resources in the community via HMIS. The HMIS Referral report provides a count of referrals made from grantees and subgrantees to outside organizations.~~

~~Specific referrals that can be tracked in HMIS are:~~

| | Service Code | Description |
|---|---------------------|---|
|  | BH | Housing/Shelter |
|  | H | Education |
|  | L | Health Care |
|  | N | Income Support and Employment |
|  | ND | Employment |
|  | P | Individual and Family Life |
|  | R | Mental Health and Substance Use Disorder Services |

~~OHCS or the Local System Administrator can create this referral process in HMIS. HMIS Users can then “Refer” participants to other services in the community via a referral in HMIS. Contact OHCS if additional assistance is needed for this HMIS referral tracking.~~

(F)(E) Comparable Database

Victim service providers are prohibited from entering data in HMIS; however, they are required to maintain comparable databases which provide aggregate information and data consistent with HMIS data collection requirements.

Comparable Databases must have the following characteristics:

- The victim service provider controls who can access and see client information;
- Access to the database is carefully controlled by the victim service provider;
- Meets the standards for security, data quality, and privacy of the HMIS within the Continuum of Care. The Comparable Database may use more stringent standards than the Continuum of Care’s HMIS;
- Complies with all HUD-required technical specifications and data fields listed in HMIS;
- Be programmed to collect data with the most up-to-date HMIS Data Standards;
- Have the functionality necessary to de-duplicate client records within each system in order to provide an aggregate and unduplicated count of clients by project type;
- Be able to generate all reports required by federal and state partners, for example, the HUD-CoC APR, HUD-ESG CAPER and the OHCS Participant Demographic Report; and
- Data fields that can be modified and customized by the victim service provider to benefit clients.

Additionally, individual survivor data must be routinely destroyed as soon as the program no longer needs it to provide client services or to satisfy grant/legal requirements. Victim service providers may suppress aggregate data on specific client characteristics if the characteristics would be personally identifying. Finally, the program's contract with the database vendor should include binding agreements to ensure security of and program control over client data.

~~(G)(F)~~ **Reporting Requirements**

~~Grantees are required to submit quarterly program reports by the 20th of the month following the end of each quarter in accordance with OHCS Grant Agreement directives for content and format. Grantees are required to submit an annual report within the timeframe set by OHCS. At the discretion of OHCS, other reports may be required when deemed necessary to provide program utilization and performance information. Subgrantee reporting to grantee must occur timely, so that grantees can meet the required deadline for reports to OHCS. Assistance with HMIS data entry, data quality and reporting may be found on our website at: <https://www.oregon.gov/ohcs/Pages/best-practices-hmis.aspx>~~

Grantee and any subgrantee(s) are required to submit to the Agency all reports as required in accordance with OHCS Grant Agreement. Data collection and reporting, which may include personally identifiable information, must be conducted through the use of OHCS-approved systems including HMIS or HMIS-Comparable systems for Victim Service Providers. Recipient shall utilize existing systems (OPUS for fiscal management, and HMIS for program outcome management, Procorem or an automated export of disaggregated HMIS participant information, for reporting submission) for all funding under this program in accordance with applicable policies and procedures. Grantee may request additional technical assistance from OHCS as needed.

Grantee may request a reporting deadline extension, subject to approval by OHCS staff. Requests must be emailed to HCS.REPORTING@hcs.oregon.gov prior to the submission deadline.

The following reports are required throughout the Performance Period:

- Quarterly data using the SAP Business Objects (the HMIS reporting tool) System Query Report. The report is due 20 days following the end of each quarter. The System Query data may be submitted by the HMIS administrator for all OHCS-funded HMIS Participating Agencies/Providers in the HMIS instance.

8. Records Requirements

(A) Case Files

Documentation of client eligibility and services received must be maintained in client case files (paper or electronically). Documentation for applicants found to be ineligible for assistance or for clients who are no longer eligible to receive assistance is required and will

include the client’s request for assistance, why they are ineligible and how it was communicated to the applicant. Ineligible clients do not need to be entered into HMIS unless the use of HMIS is a part of the grantee or subgrantee’s intake/assessment process.

Drop-in or mass shelter facilities that provide bed nights and no case management must maintain sign-in attendance documentation that includes shelter resident self-certification of their homeless status. All other shelter provisions, including issuance of hotel/motel vouchers, require that client eligibility documentation be maintained in the client file.

File documentation will be the basis of OHCS monitoring to ensure grantee and subgrantee is in compliance with program requirements and regulations. OHCS recommends that grantees and subgrantees use a client file checklist to ensure adequate documentation of case files. Sample forms are available on the OHCS website.

(B) *Records Access*

Grantees and their subgrantee organizations are required to permit OHCS, the Oregon Secretary of State’s Office, the federal government, and the duly authorized representatives of such entities access to, and the right to copy, all program client and fiscal records for such purposes as research, data collection, evaluations, monitoring, and auditing. At the sole discretion of OHCS, access to records shall include the removing of records from the grantees’ and subgrantees’ office.

(C) *Records Retention*

Grantees and subgrantees shall retain all program records pertinent to client services and expenditures incurred under the program in a manner consistent with the requirements of state and federal law. This includes, but is not limited to, those requirements listed in Administrative Rule, Operations Manual and Special Schedules. Find the OHCS Special Schedule at the Oregon State Archives:

https://sos.oregon.gov/archives/Pages/state_admin_schedules.aspx.

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

https://sos.oregon.gov/archives/Pages/records_retention_schedule.aspx.

Grantees and subgrantees shall retain and keep accessible all such **fiscal and program records**, client records, digital and electronic records, books, documents, papers, plans, and writings for a minimum of **(6) six years**, or such longer period as may be required by applicable law, whichever date is later, following final payment and termination of funding, or until the conclusion of any audit, controversy or litigation arising out of, or relating to, the funding, whichever date is later.

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9. Definitions

A. Case Management Expense is inclusive of

- Intake and assessment, including time spent assessing a household, whether or not the household is determined eligible;
- Direct client services includes developing an individualized housing and service plan, monitoring and evaluating household progress, identifying creative and immediate housing solutions outside of the traditional homeless service system (diversion), and ensuring that households' rights are protected;
- Services that increase access to the income supports of disability benefits programs administered by the Social Security Administration for eligible adults who are experiencing or at risk of homelessness and have a serious mental illness, medical impairment, and/or a co-occurring substance use disorder (i.e., SOAR or similar style services);
- Services for clients entering into or are in permanent supportive housing and need assistance to stabilize;
- Placement services includes services or activities designed to assist households in locating, obtaining, and retaining suitable housing, tenant counseling, assisting households to understand leases, inspections, securing utilities, making moving arrangements, and representative payee services concerning rent and utilities;
- Mediation and outreach to property owners/landlords related to locating or retaining housing;
- Outreach services;
- Connecting clients to resources;
- General liability insurance and automobile insurance;
- Training; and
- Salary, benefits of staff performing case management services.
- Data entry

B. Client Direct Services are the provision of goods or payments of expenses not included in other allowable expense categories, which directly help a household to obtain or maintain permanent housing or meet essential household needs, as documented in the client service or housing plan. Consumer debt payments are not allowed as a client direct service. Prior approval by the case manager's supervisor is required before goods or payments are delivered.

C. Code of Conduct Agreements may be required by any type of shelter facility. A Code of Conduct Agreement may be required that clients adhere to the shelter facility's rules and expectations of behavior and may be signed by the client. Code of Conduct Agreements are not the same as Occupancy/Lease/Rental Agreements.

D. Emergency Shelter means a facility whose primary purpose is to provide temporary shelter to homeless households or specific populations of the homeless and which do not require

occupants to sign leases or occupancy agreements. Emergency shelter types may include, but are not limited to:

- **Low-Barrier Shelters:** Shelters with limited entry requirements that enable people, who otherwise may not be willing or able to access shelter services, to be off the streets. Low barrier shelters may not expect residents to abstain from using alcohol or other drugs, or from carrying on with street activities while living on-site, so long as they do not engage in these activities in common areas of the house and are respectful of other tenants and staff. Low barrier shelters may allow pets, allow couples to stay together, and may provide secure storage space for personal item. Low-barrier shelters are a state priority and should be implemented whenever feasible.
- **High Barrier Shelters:** Shelters where residents must meet specific entry requirements such as passing a sobriety/drug or alcohol test, criminal background check, allow belongings to be searched, have a specific level of income, participate in program activities, etc.
- **No-Barrier Shelter:** shelters where residents are not required to meet any specific entry requirements.
- **Abstinence-Based or Dry Shelter:** Shelters where residents are not allowed to drink alcohol or use other drugs while in tenancy. Residents are expected to be "clean" before moving in and actively working on their recovery while living there and may be discharged from the program if they refuse treatment for a relapse.
- **Wet Shelters:** Shelters where residents are not expected to abstain from using alcohol and other drugs, and where entering a rehabilitation program is not a requirement. Residents have access to recovery services and get to decide if and when they use these services.
- **Damp Shelters:** Shelters where residents do not need to be "clean" when entering the program but are expected to be actively working on recovery from substance use problems.
- **Day Shelters:** Temporary daytime accommodations and services for individuals and families who meet the definition of literally homeless as described under Client Eligibility and are sleeping on the streets, lack a fixed, regular and adequate nighttime shelter and/or are living in an emergency shelter.
- **Emerging Models of Shelter** may include "sleeping pods", "conestoga huts", "sanctioned rest stops" or "sanctioned camping areas", etc.
- **Warming Shelters** are a short-term, emergency shelter that operates when temperatures or a combination of precipitation, wind chill, wind and temperature become dangerously inclement. Their paramount purpose is the prevention of death and injury from exposure to the elements.
- **Transitional Shelters:** Emergency shelter projects with a primary purpose to provide temporary or transitional shelter and essential services to all eligible clients in general and/or for specific populations of the homeless. Some transitional shelter programs have a comprehensive service focus and participants may stay for a period of time based on client need. Transitional shelters are different from transitional housing, as they do not require

- an occupancy/rental/lease agreement. Transitional shelters may require a code of conduct agreement.
- **Mass Shelters:** High volume, high turnover emergency shelters where multiple individuals and/or family households sleep.
 - **Hotel/Motel Vouchers** used as emergency shelter in those areas and times when no emergency shelter is available.
 - **Vehicular Shelters:** Vehicular shelters provide clients with a place to park their vehicle that is secure and free from ticketing, where they have access to garbage and sanitation services, onsite management that ensures the safety of participants, site cleanliness and adherence to site rules. Participants in vehicular shelters are provided access to client services.
- E. Essential Components of Service Delivery** are included in the Operational Standards. They are the use of Housing First, maximizing participation in Coordinated Entry, ensuring availability of Low-Barrier Shelters in the community, incorporating the Lived Experiences of Homelessness into program design and implements and ensuring service provision has components for Equity and Racial Justice.
- F. Housing First** is an approach to quickly and successfully connect individuals and families experiencing homelessness to permanent housing without preconditions and barriers to entry, such as sobriety, treatment or service participation requirements.
- G. Occupancy/Lease/Rental Agreements** are used for temporary or permanent housing, which includes Transitional Housing. Occupancy/Lease/Rental Agreements are not the same as a Code of Conduct Agreement.
- H. Pet Deposit** means a security deposit required by a landlord in order to house an individual or family. Pet deposits are limited to one pet. Pet deposit does not include monthly pet rent or repayment of any damages by a pet exceeding the pet deposit. Other sources of funding must be deferred to first and pet deposit assistance is only eligible when other sources of funds cannot be obtained and providing a pet deposit is necessary, and documented in the client file, to ensure stability in housing.
- I. Priority Population** means persons that the grantee/subgrantee has determined as having the greatest need and will receive services first (such as veterans and homeless families with children). (For example, for the purposes of HSP, TANF clients are a priority as required by the federal funds.)
- J. Rent arrearage** means past due rent owed to a current landlord. ~~Payment of arrears is restricted to 6 months past due rent, per calendar year.~~ Grantees and subgrantees have the discretion to limit payments for rent arrearage. Arrears may also include other rental-related expenses incurred such as filing fees, property damage, court fees or lease break fees to a previous landlord (or collection agency) when being required by a prospective landlord., with a case manager's supervisor's approval. There must be **documented evidence** from the

prospective landlord that payment of the arrears is necessary for the participant to obtain permanent housing and maintain stability in that housing and a unit must be lined up and available for the client's occupancy if such arrears are to be paid.

- K. "Snapshot" Method** means the process of determining the estimated annual income that uses a "snapshot" of the household income at the time of application. It does not rely on a specific period of time in the past to determine the annual income amount. The method is best used when a household's income has recently changed drastically or when income tends to be very volatile.
- L. Target Population** means persons a grantee/subgrantee wishes to reach out to who are under-represented in their service population.
- M. Transportation Payments** may include bus/train passes, fuel vouchers, vehicle insurance payments or vehicle repair. Payments that allow clients to use public transportation are the highest priority; however, case managers have the discretion to provide payments for private transportation. Case managers must document why private transportation options are preferred over public transportation options and that the expense will lead to the stabilization of housing. Car repairs for a vehicle not owned by an individual in the household are not allowed and client must have a valid driver's license.
- N. Utility arrearage** assistance is past due utilities and can only be provided when there is documented evidence of a utility bill in the participant's name.. If arrears are owed to a previous utility company or to a collection agency, these arrears may be paid, but only when there is **documented evidence** that payment of the arrears is necessary for the participant to obtain utility service and payment of utility assistance is in the context of, and documented in, an action plan or goal designed to increase housing stability.
- O. Veteran** means a person who:
- Served on active duty with the Armed Forces of the United States:
 - For a period of more than 90 consecutive days beginning on or before January 31, 1955, and was discharged or released under honorable conditions;
 - For a period of more than 178 consecutive days beginning after January 31, 1955, and was discharged or released from active duty under honorable conditions;
 - For 178 days or less and was discharged or released from active duty under honorable conditions because of a service-connected disability;
 - For 178 days or less and was discharged or released from active duty under honorable conditions and has a disability rating from the United States Department of Veterans Affairs; or
 - For at least one day in a combat zone and was discharged or released from active duty under honorable conditions;
 - Received a combat or campaign ribbon or an expeditionary medal for service in the Armed Forces of the United States and was discharged or released from active duty under honorable conditions; or

- Is receiving a nonservice-connected pension from the United States Department of Veterans Affairs.

Appendix A – Maintenance/Rehab Activities

EXAMPLES OF MAINTENANCE ACTIVITIES vs. REHABILITATION ACTIVITIES FOR ENVIRONMENTAL REVIEW PURPOSES

| Feature or System | Maintenance Activities ⁴ | Rehabilitation Activities ⁵ |
|------------------------------------|--|---|
| Site | <ul style="list-style-type: none"> • lawn care (litter pickup, mowing, raking), trimming trees and shrubs • snow/ice removal • neighborhood cleanup • application of pavement sealants, parking lot restriping, directional signage or marking for handicapped accessibility • repair of cracked or broken sidewalks | <ul style="list-style-type: none"> • new landscaping throughout an area • construction of new walkways, driveways or parking areas, or replacement thereof |
| Building Exterior | <ul style="list-style-type: none"> • cleaning and fixing gutters and downspouts • repainting previously painted surfaces (including limited wet scraping and low-pressure washing) • replacing deteriorated section of siding • removal of graffiti | <ul style="list-style-type: none"> • cleaning masonry or stripping painted surfaces by sandblasting, acid wash, or high pressure washing • applying new exterior siding |
| Roof | <ul style="list-style-type: none"> • fixing leaks • application of waterproof coating to a flat roof • replacement of deteriorated flashing • in-kind replacement of loose or missing shingles or tiles | <ul style="list-style-type: none"> • complete replacement of roof with new shingles, tiles, roll roofing, membrane, or new metal roof • installation of solar panels |
| Windows and Doors | <ul style="list-style-type: none"> • washing windows • caulking, weather stripping, re-glazing windows and doors • fixing broken windowpane(s), storm window(s) or damaged entry door • replacing broken door lock • replacing a vandalized entry door to restore security of a building or unit • replacing a single severely damaged window to match • annual switch out of storm and screen panels | <ul style="list-style-type: none"> • replacement of windows • replacement of exterior doors • adding storm windows or storm doors |
| Interior Walls and Ceilings | <ul style="list-style-type: none"> • patching or mending cracked plaster • patching or fixing holes or cracks in drywall • replacing stained ceiling tiles • painting or wallpapering | <ul style="list-style-type: none"> • installation of new drywall or paneling • installation of new acoustical ceiling • installation of dropped ceilings |
| Flooring | <ul style="list-style-type: none"> • cleaning floors • stripping wooden floors and resealing • installation or replacement of carpeting or vinyl flooring* | <ul style="list-style-type: none"> • installation of new wood floor |

* These maintenance items may require purchase of flood insurance if they occur in a Special Flood Hazard Area (SFHA), and costs exceed the standard deductible for the specific type of structure or unit under the National Flood Insurance Program (NFIP).

| Feature or System | Maintenance Activities ⁴ | Rehabilitation Activities ⁵ |
|----------------------------|---|---|
| Circulation | <ul style="list-style-type: none"> • in-kind replacement of broken stair treads or balusters • inspection and servicing of elevators | <ul style="list-style-type: none"> • rebuilding stair or constructing new stair • installation of new access ramp • elevator replacement |
| Kitchen | <ul style="list-style-type: none"> • replacement of stoves, refrigerators, and microwaves* • replacing cabinet hardware* | <ul style="list-style-type: none"> • complete or substantial kitchen remodel |
| Bathroom/Laundry | <ul style="list-style-type: none"> • unclogging sink or toilet • replacing deteriorated toilet in an occupied housing unit* • replacing broken medicine cabinet* • replacing washing machines and dryers* • installation of grab bars | <ul style="list-style-type: none"> • complete or substantial bathroom remodel |
| HVAC | <ul style="list-style-type: none"> • servicing and maintenance of mechanical systems • changing air filters • cleaning air ducts • installing or replacing a window air conditioner • replacing a malfunctioning part of a HVAC system like a thermostat * | <ul style="list-style-type: none"> • installation of new furnace or heat distribution system • installation of central air conditioning |
| Electrical/Lighting | <ul style="list-style-type: none"> • changing light bulbs • replacing malfunctioning light fixture, electrical switch or outlet* | <ul style="list-style-type: none"> • major rewiring of building • installation of new electrical service • replacing or moving electrical panels |
| Plumbing | <ul style="list-style-type: none"> • fixing plumbing leaks* • repairing damage from frozen pipes* • repairing water or sewer connection within existing utility trench alignment • replacing malfunctioning water heater* | <ul style="list-style-type: none"> • installation of new plumbing system • new water or sewer connection |
| Security | <ul style="list-style-type: none"> • repair of security alarm systems • boarding up a vacant building with protective plywood • installation of temporary security fencing • installation of security devices needed for an individual health facility patient | <ul style="list-style-type: none"> • installation of permanent security bollards • installation of new security alarm system |
| Life Safety | <ul style="list-style-type: none"> • servicing smoke, fire and CO2 detectors • installation of smoke, fire and CO2 detectors | <ul style="list-style-type: none"> • making substantial physical changes to a building to comply with fire and life safety codes • installing fire suppression system |
| Pest Infestation | <ul style="list-style-type: none"> • pest inspection/treatment | |

⁴ Categorically Excluded from NEPA and not subject to the related authorities listed in 24 CFR 50.4 and 58.5, unless Extraordinary Circumstances apply pursuant to 24 CFR 50.19(a) or 58.35(c).

⁵ Generally Categorically Excluded from NEPA and generally require review under related authorities listed in 24 CFR 50.4 and 58.5, but an RE or HUD reviewer may make a determination that an Environmental Assessment or Environmental Impact Statement is required due to individual project circumstances.

