Central Oregon Multi-Agency Coordination (MAC) Team Meeting
Wednesday, April 3
10:00 – 11:00 am

ONLINE ONLY
Zoom link: https://us06web.zoom.us/j/86491829002?pwd=eoGyr5IBJyjoBcKiIO9uweAMYudxTU.1

10:00 – 10:05
1. **Welcome and Introductions –** *Michelle Williams, COIC*
- Please enter your name and organization in the chat

10:05 – 10:15
2. **Remaining EO 23-02 Funding Summary –** *Michelle Williams, COIC*
- Overview of what has been unallocated to projects
- Considerations for remainder of provider benefit funds
- Old Mill Inn and Suites Update

10:15 – 10:30
3. **Future Funding Household Requirements –** *Erik Nelson, COIC*
- EO-23-02 Household Spots 1/10/2024 & LTRA
- EO-24-02 Household Spots 1/11/2024 – 1/10/2025
- ORI Households through 6/30/2025

10:30 – 10:45
4. **Future Legislative Funding Update -** *Michelle Williams & Katie Carter, COIC*
- 5511, LTRA, ORI quick overview
- LTRA- Long Term Rental Assistance plan due to the State 4/5/2024
- Need to Plan Future Funding Strategy & Regional Priorities
- Current Funding needs for MAC approval from 5511

10:45 – 10:55
5. **Planning Committee's & Aligning Efforts –** *Erik Nelson, Michelle Williams, COIC*
- Subcommittee for LTRA Plan
- Funding Strategy & Regional Priorities
- ORI Strategy & Plan

10:55 – 11:00
6. **Wrap-Up and Review –** *Michelle Williams, COIC*
- Wilson Project
- Upcoming Meetings- suggest meet every two weeks starting April 17th

EO Funding Buckets and Overview:

Buckets:	HB 5019/ EO 23-02 1/10/2023- 6/30/2024	SB 5511 1/10/2024 - 6/30/2025	SB 5511 - LTRA 1/10/2024 - 6/30/2025	SB 5506 2023 - 2025 Biennium but spend to 6-30-2027	Total funds avail
RRH	6,559,386	-	4,611,358	1,153,516	5,764,874
Unit Access	-	1,700,000	-	-	1,700,000
Shelter	4,999,628	6,748,474	-	-	6,748,474
Outreach	813,337	499,641	-	494,364	994,005
Data Collection	143,530	-	-	100,000	100,000
Admin	2,208,685	1,579,079	813,769	308,449	2,701,298
Total	14,724,565	10,527,194	5,425,127	2,056,329	18,008,650
Amount left					
Amount unallocated	19,870				19,870
					18,028,520
Goals, Uses and Requirements		Sustain Efforts of HB 5019.			
Goal Shelter beds	Created 176	Continue to fund 176 shelter beds for operations			
RRH Homeless households	Housed 202	Not to pay rent for the 202 slots for RRH	Rent for the 202 RRH slots from HB 5019	RRH 60 households (new not related to HB 5019) These households can be: Literally Homeless, unsheltered	
		Continue funding outreach		exiting institution, fleeing DV, Hud McKinny Vento No income or age requirements	
Unit Access		Block Leasing, landlord engagement and incentives, conversion, rehabilitation renovation, data collection, HMIS, Coordinated Entry planning and delivery Tech asst. Admin expense.		Rental Ass. 24 months max, move in direct financial asst. Supportive Housing services, landlord engagement, block leasing Coordinated entry planning and delivery costs, data collection	
Restrictions (not allowed)					
Construction and Acquisition	only for shelter no RRH	New Construction		acquisition, construction, conversion, rehabilitation	
RRH	Only for unsheltered households	Rental Assistance Rehousing for new individuals over our 202 slots from HB 5019		capacity building	

Senate Bill 5511: Sustaining Efforts of Executive Order 23-02	# of Beds	Budget						
		Shelter Operations	FTE	Street Outreach & Navigation Staffing	# of units	Unit Access	Admin	Total
		6,748,474		499,641		1,700,000	1,579,079	10,527,194
JBJYS - Grandma's House	4	417,000					40,032	457,032
JBJYS - The LOFT	4	369,000					35,424	404,424
JCFBN - Secure Care Shelter Services Center (Madras)	29	636,364					63,636	700,000
Shepherd's House Ministries - Redmond Campus	46	1,277,534					50,000	1,327,534
Redmond Oasis Village	20	767,752						767,752
City of Bend - Franklin Shelter	60	1,310,000					145,555	1,455,555
JBJYS - Canal House	5	464,000					47,004	511,004
								-
Outreach								
JBJYS - Crook and Jefferson County SOP				75,000			7,200	82,200
Project Totals		5,241,650		75,000		-	388,851	5,705,501
Unallocated Funds		1,506,823		424,641		1,700,000	1,190,228	4,821,693

Legislative Funding to Central Oregon OR-503

HB 5019

EO23-02

OR-503 Awarded $14,724,565 Contract Period - From 1/10/2023 to 6/30/2024

- Admin $2,208,684.75
- Data Collection $143,529.99
- RRH $6,559,385.95
- Shelter $4,999,627.74
- Outreach $813,336.57

EO 23-02 GOAL - Create 111 Emergency Shelter Beds, Rapidly Rehouse 186 households by January 10, 2024.

EO 23-02 RESULTS- Created 176 Emergency Shelter Beds, Rapidly Rehoused 203 households.

EO 24-02 GOAL - Rapidly rehouse 100 households between January 11, 2024 and January 10, 2025. Households to meet unsheltered criteria of funding.

SB 5511

OR-503 Awarded $10,527,194 Contract Period - From 1/10/2024 to 6/30/2025

- Admin $1,579,079.10
- Shelter $6,748,473.85
- Outreach $499,641.05
- Unit Access $1,700,000.00

Sustaining Efforts of EO23-02 and to continue to build upon the initial investments made from HB 5019 to ensure shelters, outreach positions, and other Program related functions continue to receive funding.

SB 5511 - LTRA

Long Term

Rental Assistance

DRAFT ALLOCATION

OR-503 Awarded $5,425,126.53 Contract Period - TBD

- Admin/Planning Advance $813,768.98
- Program Budget $4,611,357.55

Community Planning Template deadline extension: 4/5/2024

186 Rental Assistance Slots (1st Priority Group: Households placed into housing through HB5019 EO23-02 efforts; 2nd Priority Group: To be determined by region.

SB 5506

ORI

Oregon Rehousing Initiative

Statewide Rehousing Program previously SPA

DRAFT ALLOCATION

OR-503 Awarded $2,056,329.44 Contract Period - TBD

- Admin $308,449.42
- Program $1,747,880.02

Statewide rehousing investment to support ***NEW*** household placement into permanent housing. This program is similar to RRH in EO23-02, but with a broader homelessness definition and eligibility criteria.

Funds will support placement into permanent housing throughout the remainder of the 23-25 biennium, with rehousing placements taking place by June 30, 2025. Regions will have until the end of the 25-27 biennium to fully expend funds through rental assistance (up to 24 months), supportive services, and other programmatic costs connected to rehousing of those placements made by June 30, 2025.

Regional Planning Template submitted 3/8/2024

Long-Term Rent Assistance Program (LTRA) February 2024

OREGON HOUSING and COMMUNITY SERVICES

Program Guidance

CONTACT
Oregon Housing and Community Services
Homeless Services Section
(503) 986-2000

Publication Date: February 2024

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Program Overview

Program Intent

Long-Term Rent Assistance (LTRA) is a proven strategy and a critical tool to support housing stability- and for some people, is key to their ability to stay housed. LTRA provides rent subsidy to eligible low-income tenants and allows landlords to rent apartment and homes to these tenants at fair market rates. Investing in LTRA resources is an avenue towards a future where fewer people live in shelters, motels, on the street, or doubled up in unstable arrangements; fewer families, seniors, and people with disabilities have to choose between paying the rent and buying necessities like medicine or food. Taken together, these benefits could substantially reduce low-income households' exposure to hardship and trauma and improve their chances of long-term success, while also preserving the value of the investment the state has made into other services to rehouse households to begin with.

Program Summary

Governor Tina Kotek issued three Executive Orders that each seek to spur rapid action, helping to address homelessness and housing instability and their root causes. **Executive Order (EO) 23-02** declared a state of emergency in Continuum of Care regions, which experienced increased unsheltered homelessness by 50% or greater since 2017.

In alignment with the Executive Orders, Governor Kotek also proposed three actionable goals to be achieved by Jan. 10, 2024:

1. Prevent 8,750 households from becoming homeless statewide.
2. Add 600 low-barrier shelter beds in emergency areas.
3. Rehouse at least 1,200 unsheltered households in emergency areas.

The Oregon State Legislature passed **House Bill 5019** and **House Bill 2001** to fund and support the emergency response efforts outlined in Executive Order 23-02.

As part of that effort, OHCS was tasked with creating a Long-Term Rent Assistance Program to ensure that the households rehoused through Executive Order 23-02 and HB 5019 rehousing investments have access to long-term rent assistance and services after Jan. 10, 2024, if needed to prevent them from re-entering homelessness and for the purpose of maintaining their housing stability over the long-term.

The Long-Term Rent Assistance (LTRA) program will provide rent subsidy to eligible households to increase housing access and long-term housing stability for people exiting homelessness.

Guiding Principles

1. **Lead with racial equity.** Racial equity is achieved if one's racial identity is no longer predictive, in a statistical sense, of one's disparate housing, economic, and health outcomes.
Instead, outcomes for all racial groups are improved. Racial equity includes addressing root causes of inequities. We strive to embed racial equity into the design, implementation, performance measures, and monitoring of our work.

    - Eliminate policies, practices, attitudes, and cultural messages that reinforce differential outcomes by race or otherwise fail to address them. Achieving racial equity is a process. This means that Black people, Indigenous people, and people of color—those most impacted—are part of the decision-making about funding, policies, and programs as outlined by Center for Assessment and Policy Development and Center for Social Inclusion.
    - Commit OHCS advancing racial equity and justice in alignment with the Oregon Statewide Housing Plan. OHCS's racial equity work is informed by national promising practices and lived experience of communities of color. OHCS and its grantees commit to an intentional, data-driven approach to reducing disparities in housing and social service provision. Additional guidance and information continue to be developed to further identify how OHCS and grantees can advance equity and racial justice within state and federally funded programs. To achieve racial equity in the community, government (local, regional, and state) must be working in partnership with communities and other institutions.
2. **Maintain long-term housing stability.** Including long-term housing stability for people experiencing homelessness who were re-housed during the implementation of EO 23-02 and with the rehousing investments outlined in HB5019.
    - Assess and prioritize re-housed households for LTRA assistance across the State.
    - Develop clear yet flexible guidance for LTRA programs to meet the various needs of households to achieve long term stability.
3. **Remove barriers and simplify processes.**
    - Build referral and intake process focusing on low barrier access ensures those needing services can obtain them. Focus on homelessness and extremely low-income as key factors of eligibility over other criteria.
    - Structure Program design and operation to be streamlined to offer support where applicable to retain a household's housing with minimal barriers for both participants and landlords.
4. **Support local flexibility and responsiveness.** Provide local flexibility where possible to build on the local flexibility that services funded through House Bill 5019 under the Executive Order 23-02 have already received.
    - Flexibility. Many communities across the EO regions are using a combination of rental assistance strategies. To align with the Executive Order approaches, the LTRA program will continue to allow for this local flexibility.

- Responsiveness. Program evaluation and stakeholder feedback can further shape and refine how these different approaches can work together.

5. **Strengthen relationships with landlords.** Strong partnerships with landlords to address each community's unique needs. Landlords are vital in preventing evictions and helping individuals and families find new homes.
   - Partner with landlords to make a real difference in ending homelessness by making units more accessible to those in need and taking advantage of available programs.
   - Increase awareness of identified liaisons in each region of the state who can support landlords interested in supporting this work which the state will make this information available to landlord associations.

Eligibility Criteria

Providers are responsible for ensuring that households admitted to the program meet program eligibility requirements. This includes any individual approved to join the household after the household has been admitted to the program. The household must provide any information needed to confirm eligibility and determine the level of household assistance. To maintain consistent eligibility criteria, the LTRA program may conduct additional screening only to determine if a household is already participating in other long-term rental assistance programs.

- **Priority One**: The households that will be rehoused via EO 23-02 and HB5019 will have eligibility priority for LTRA assistance.
- **Priority Two:** If there are turnover, local communities would have discretion about which subpopulations of people experiencing homelessness in their communities to prioritize to refill available spots. (See Referrals section in this guidance for homelessness definitions).

LTRA Structure

The LTRA program is designed to ensure ongoing rental assistance and services designed to support eligible tenants' housing stability through locally orchestrated regional administration. The program will allow for local flexibility compared to traditional rental assistance programs such as the Housing Choice Voucher program while ensuring consistent results for Oregonians in need of the services recognizing the unique strengths every community across Oregon holds and the importance of incorporating best practices for effective rental assistance program administration.

The Program will be dispersed through the CoCs via the Collaborative Applicants (CA) (otherwise known as the CoC Lead Agency) and the CA will have the responsibility to designate the service providers and regional administrator for the region.

The LTRA program will require a Tenant-based structure.

Tenant-based structure:

- Tenant-based rental assistance is a rental subsidy that aids individual households to enable them to rent apartments and homes at fair market rates.
- Tenant based programs offer a household the opportunity to choose its neighborhood (including the school district) as well as its type of housing (such as a single-family home, large apartment building, duplex, etc.).
- Communities must set income thresholds for tenant rent contribution and may consider fixed percentage and progressive contribution models. (See Income and Subsidy Determinations and Amount of Assistance section in this guidance).
- When a household is determined to be eligible for the program and funding is available, the household is issued a tenant voucher. When the household finds a suitable housing unit (see Inspection Requirements section in this guidance) the LTRA administrator will enter a contract agreement with the landlord and the household will enter a lease agreement with the landlord. Each party makes their respective payment to the landlord so that the landlord receives full rent.
- Even though the program administrator determines the household to be eligible for the program, the landlord has the responsibility of approving the family as a renter. The agency continues to make payments to the owner if the household is eligible, and the housing unit continues to qualify under the program.
- Households who were rehoused through EO 23-02 and determined to need LTRA assistance, may choose to utilize their voucher in their current unit. Units must meet inspection requirements as outlined in the inspections portion of this guidance.
- If the household needs to change location, the household may take the assistance along when moving to another rental unit.
- LTRA administrator will need to determine tenant-based contract terms at a minimum to include:
    - Length of contract term
    - Contract termination
    - Inspections
    - Rent increase
    - Household composition and changes

Supportive Services

Funds may be used to help individuals achieve a greater level of housing security. Costs under this category must be reasonable and sufficient to stabilize the household. LTRA Program funds are not intended to be used solely for support services. Support services are not permitted for individuals and households who are not in need of LTRA rental subsidy. Programs are encouraged to utilize strategies to braid or blend funding streams to increase supportive services opportunities.

OHCS encourages the use of Medicaid eligible reimbursable services to augment the supportive services a household may need Costs and rationale for expenses must be communicated through the Community Plan to demonstrate how they will balance the household need for rent assistance and support services. Eligible expenses may include, but are not limited to the following examples:

- Staffing and support for retention and Wrap-around Case Management. The concept of "Wraparound" programming is used to describe any program that is flexible, family or person-oriented and comprehensive.
  In a "Wrap-around" approach, a team of professionals (e.g., educators, mental health workers, social workers, etc.) and key figures in an individual/household's life (e.g., family, community members, religious leaders etc.) create, implement, and monitor a plan of support.
- Because "Wrap-around" is a strengths-based intervention and individualized wrap-around plan is supposed to reflect the needs of the individual or family, rather than availability of services. A wrap-around approach is designed for people/families with complex needs. A form of Collaborative Community Case Management.
- Work supports (i.e., training costs; transportation assistance – bus tokens, ride sharing, auto repair; childcare or eldercare costs, clothing to support employment needs, tech to support Wi-Fi access, phone costs) 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.
- Basic life skills information/counseling on money management, use of credit, housekeeping, proper nutrition/meal preparation, and access to health care (e.g., doctors, medication, and mental and behavioral health services).
- Furniture and household goods to support a household with moving to a new home (i.e., bedroom furniture, bedding, pots, pans, kitchen utensils, bath towels, etc.
- Providers may make available housing search assistance as part of supportive services that may include: Assistance identifying eligible units, including physically accessible units as needed; Outreach to owners of potentially eligible units; Provide transportation assistance and direction to potential units; Assist families and individuals with rental applications, rental agreements and other paperwork; Advocate directly, as needed, with landlords on behalf of the families and individuals; and Otherwise help expedite the LTRA leasing process for families and individuals.

Application & Referral

Referral Criteria - General

- The households that will be rehoused via EO 23-02 and HB5019 will have priority for the LTRA program and will not require re-screening for eligibility to include income, Fair Market Rent (FMR) requirements, and rent reasonable standards.

- OHCS reserves the right to modify this prioritization requirement based on information provided in the community plans.
- In general, households must meet both the income criteria outlined below as well as the housing status eligibility criteria outlined below, with exceptions made for those that were rehoused under EO 23-02 and HB5019
- When there is a turnover, local communities will have discretion in choosing specific subpopulations of people experiencing homelessness in their communities to prioritize for spots within the program budget and consistent with applicable OHCS approved Community Plan.
- When serving other populations and determining prioritization, an example of this approach can be found in the utilization of the 1115 Medicaid Waiver.
  For instance, when refilling available spots within the program budget for short-term rental assistance benefits, communities may target individuals who have accessed the 1115 Medicaid waiver aligning their efforts with the overarching goal of providing essential services to this subpopulation group.
  All subpopulations must still meet the definition of homeless as defined in this guidance (See Section: Referral Criteria – Living Situation).
- For the LTRA program there is not a requirement to obtain and verify Social Security Numbers (SSN) and documentation evidencing citizen status before admitting the household to the program.

Referral Criteria - Household Composition

- Each household must identify the individuals to be included in the household at the time of application and must notify the provider if the household composition changes (See household composition changes in this guidance).
- Household composition may include but not be limited to the following, regardless of actual perceived sexual orientation, gender identity, or marital status.
  - A single person, who may be an elderly person, displaced person, disabled person, near elderly person, or any other single person.
  - A group of people residing together. Such group includes but is not limited to a family with or without children (a child who is temporarily away from the home because of placement in foster care is considered a member of the family), an elderly family, a near-elderly family, a disabled family, a displaced family, or the remaining member of a family.

Referral Criteria – Income Limits

- Using Income Limits for Eligibility. Initial program income eligibility limits must be set at 80% Area Median Income (AMI) or below if determined by local regional administrator.
- Households rehoused under EO 23-02 who have been determined to need LTRA services based upon the approved Community Plan methodology for determining need for this population and have higher incomes than the 80% AMI will receive an exception to the above requirement.

- Programs may set regional income limits lower than 80% AMI for eligibility at program admission. Income limits are used to determine eligibility for the program and for income targeting purposes by comparing the annual income of an applicant household to the applicable income limit for the household size. Example income limit definitions lower than 80% AMI may include but not limited to the following:
    - Very low-income household. A household whose annual income does not exceed 50% of the median income for the area, adjusted for household size.
    - Extremely low-income household. A very low-income household whose annual income does not exceed the higher of the federal poverty level or 30% of area median income, adjusted for household size.

Referral Criteria – Living Situation

For purposes of the LTRA program referral and eligibility, the definition of homeless is defined as the following:

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
- When entering homelessness from an institutional care facility (i.e., hospitals, jails, substance abuse or mental health treatment facilities, or other similar facility) -To reduce barriers, there is no maximum time limit for days spent in institutional care that would cause ineligibility for EO rapid rehousing. This differs from HUD's definition of homelessness, which stipulates that time spent in an institution must not exceed 90 days to not constitute a break in homelessness. OHCS acknowledges the importance of recognizing where the point of entry may be for communities and has expanded the definition of eligibility for rapid rehousing as a result.

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 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; sexual assault, stalking, labor, and human trafficking, or other dangerous or life-threatening conditions that relate to violence.

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.
  - Previously experience of homelessness.
  - Time limited rental emergency assistance programs that are coming to an end or combination of extremely low income and severe cost burden.
- Communities should establish a flexible process with multiple referral paths.
- The Counties coordinated access systems should be the primary referring agencies. Other referring agencies may include community-based and culturally specific partner organizations, hospitals, health care and mental health institutions.
- Each referring agency will need to screen potential participants for program eligibility, according to LTRA guidelines.
- Referral pathways should be equitable, inclusive, and effective at connecting eligible participants with appropriate housing options and supportive services (See Supportive Services section in this guidance).

Application Process - General

Communities may determine the application process for their LTRA programs. Taking into consideration the following:

- A short and simple application that requests basic eligibility information like current household income will increase accessibility and ease for applicants. Applications should be provided in other languages to support an equitable application process.
- Short initial applications may be used to determine whether an applicant meets basic eligibility requirements and then determine what additional documentation is necessary.
- Provide intake assistance. Even with simple and jargon-free applications, applicants may still have difficulty navigating the application process and have questions. Where possible, one-on-one or group counseling through phone calls or virtual sessions can help applicants understand the application requirements and needed documentation.
- Provide transparency on use of information being provided and explanation of next steps. Provide multiple ways to submit applications, including on-line and through regular mail. A paper option allows tenants with limited internet access to apply.
- Application packets at minimum must include:
  - Statement of Eligibility Guidelines, so applicants understand the program and eligibility criteria.
  - Release of Information
  - Program Rights & Responsibilities
  - Grievance/Appeals Process
  - Fair Housing Information
  - Violence Against Women's Act (VAWA) Information

Application Process - Communications with Households

- If the household is eligible for assistance, it is recommended that the program notify the household in writing, or the best method determined by the household during the application process and schedule an orientation to explain program roles and responsibilities and next steps.
- If the program determines that a household is not eligible for the program for any reason, the family must be notified promptly. The notice must describe: (1) the reasons for which assistance has been denied, (2) the household's right to an informal review, and (3) the process for obtaining the informal review.

Documentation Guidelines

Requirements of documentation should not impose undue documentation burdens.

- OHCS strongly encourages programs to avoid establishing documentation requirements that are likely to be barriers to participation for eligible households,
- Programs may create a policy that allows for applications from third parties if applicants have signed and agreed to submission on their behalf.

- This should include those with irregular incomes such as those operating small businesses or workers whose income is reported on Internal Revenue Service Form 1099.
- As stated, documentation requirements should be flexible to minimize barriers. For example, government issued identification is preferred, but this can include documentation from any government agency, that includes foreign documents containing the applicant's name and date of birth.
- Programs may establish self-certification options to determine income and homeless status and may also opt for a combination of initial self-certification with the possibility to provide documentation later to expedite the application process.
- Programs should consider how to support applicants who do not have a valid ID to obtain one for the purpose of completing the rental application process.
- Citizenship status and criminal background will not be assessed as part of the LTRA program and documentation will not be required.
- Program guidelines should specify that social security numbers may be collected but are not required as part of participation in the LTRA program. Applicants should self-determine whether to provide their social security numbers.
- Examples of acceptable tenant-provided documents for income verification may include, but are not limited to pay stubs, payroll summary reports, employer notice or letters of hire and termination, SSA benefit verification letters, bank statements, child support payment stubs, welfare benefit letters and/or printouts, and unemployment monetary benefit notices.
- Programs should provide self-employment and zero income declaration forms when applicable.

Determining Assistance

Length of Assistance

- Once determination of eligibility is made for tenant-based assistance, rent subsidy is designed to be ongoing and available based on the household needs and is eligible for LTRA subsidy.
- Long-term rental assistance ends when the household is no longer eligible for the assistance, which means they are no longer receiving a rental subsidy as they are able to pay their full rent or conditions of occupancy can no longer be met.
- Assistance may also be ended if a participant violates program rules or conditions of occupancy. (See Section: Ending Program Participation)

Amount of Assistance

Specific monthly rent assistance amounts will be determined by local programs based on subsidy determination calculations policy and according to available funding.

- Communities should provide plans that encompass progressive models for rental assistance or setting different amounts of monthly assistance depending on specific factors for that household.

- Balancing household rent burden, which can cause increased likelihood of falling into homelessness, with program cost constraints would be the primary policy goals that would impact how the amount of assistance is determined.
- In long-term rent assistance programs, assistance levels are structured to prevent households from paying more than a certain percentage of their income on rent while staying within available program funds. Therefore, the percentage of rent covered varies by household and is a function of their income, the unit's rent, and any rent caps that the program establishes to control costs in order to ensure that the required number of LTRA households are served within the allocated program funds.
- No minimum rent policies must be implemented for LTRA to ensure alignment with serving zero income households and decreasing racial disparities in homelessness. Minimum Rent is what most Public Housing Authorities (PHA)s utilize to determine minimum Total Tenant Payment (TTP) amounts. The minimum rent is the least a family will contribute toward rent and utilities. Current non-Moving to Work (MTW) PHAs minimum rent can be set anywhere from $0 to $50. This type of minimum rent must not be required. Programs should create policies for when a household's income increases, the amount of the housing assistance payment on behalf of the household decreases.

  If the amount of assistance provided is reduced to zero, the program should determine timeline for when assistance for the household will end. A typical period is 180 days (about 6 months).

Tenant Screening

LTRA programs will not be required to run a criminal background check such as those required by federally funded rent assistance programs. Programs must advise landlords of the following:

- The Landlord is responsible for screening and selection of the household for tenancy to occupy the unit.
- A landlord must provide written screening criteria for applicants and must apply equally to all applicants.
- Programs may not disclose to the landlord any confidential information provided of domestic violence, dating violence, sexual assault, stalking, or other confidential information such as mental health diagnoses or health conditions, except at the written request or with the written consent of the individual providing the documentation.

Landlord Partnership

Risk Mitigation Funds

Some successful long-term rent assistance programs have offered participating landlords access to risk mitigation funds.

Through HB5019, the legislature provided funding for the state's risk mitigation fund, the **Oregon Housing Choice Landlord Guarantee Program**, Risk Mitigation Funds are intended to reimburse participating owners and landlords for extraordinary expenses not covered by security deposits, insurance payments, or other forms of reimbursement.

Risk Mitigation Funds Program may enhance the impact of LTRA by providing financial protection to landlords who operate LTRA-assisted units. This may help to mitigate housing disparities and economic inequality in the region. (Example Program: **FAX Cover Sheet (oregonmetro.gov)**

Risk Mitigation funds can be effective in an overall Landlord Engagement strategy.

- Partnerships with landlords are critical to ending homelessness and there are many strategies involved in engaging and recruiting landlords, including risk mitigation funds.
- Also referred to as a landlord guarantee or risk reduction funds, they are an added protection for landlords willing to rent to someone with limited income, a poor rental history, or a criminal history.
- The funds may cover excessive damages to the rental unit.

In addition to integration with this key state landlord incentive program, or other internal agency risk mitigation programs, we recommend integrating with other OHCS-funded unit access and incentive programs in development with the purpose of incentivizing landlords to reduce screening barriers for households receiving LTRA assistance.

Landlord Incentives

Landlord participation rates affect the overall availability of rental options as well as the location and quality of available options, thus shaping the extent to which low-income households can access the intended benefits of LTRA housing assistance through Landlord incentives can be a valuable tool.

Examples might be:

- Landlord Bonuses: One-time payments to landlords, usually at the point of lease-up or renewal. May also include referral bonuses for landlords who refer others who end up leasing to program participants.

- Funds to Overcome Rental Barriers: Funds to cover costs such as bringing units up to
- HQS/NSPIRE standards, holding fees, security deposits, application fees, rental insurance, and related costs such as credit or background checks.
- On-call support: Case manager or other staff to quickly respond to concerns or assist with urgent situations.

- Mediation services: Support resolving landlord-tenant or tenant-tenant disagreements. Property improvement services: Maintenance support or repair work, in the event a unit or surrounding property is damaged during lease term or when tenant moves out, or landscaping, gardening and other property improvement work.

Landlord Liaison Support

Landlord liaisons cultivate relationships with landlords and property managers and are characterized by services with the goal of increasing the availability of rental housing for persons who face barriers to moving from homelessness to permanent housing.

- Landlord Liaison Services are beneficial for both landlords and tenants. They provide support services for landlords that allow them to replace or relax their screening requirements (i.e., apply secondary screening criteria) for homeless people with barriers to accessing permanent housing.
- Landlords benefit by having a pool of qualified tenants who are provided with support services to improve housing retention.
- For Landlords this may reduce unit turnover, shorter unit vacancies, and fewer evictions in the long-term. Through ongoing support, tenants also benefit by increasing their ability to obtain and maintain stable permanent housing, thus reducing the likelihood of subsequent episodes of homelessness.
- The primary purpose is to benefit households experiencing homelessness through increased access to available rental housing. They may work to broker relationships between landlords and social service agencies for the benefit of households experiencing homelessness.
- Landlord Liaison Services (LLS) do not provide funding for direct capital projects to construct new rental units. Instead, services are focused on increasing access to existing housing.
- Expanding access to private market rental housing, both market rate and affordable (defined as offering being below-market rents) is a key strategy for ending homelessness.
- As a benefit to participating landlords, LLS may include providing support towards landlord/tenant issue resolution. This can be a means of quickly resolving conflicts between landlords and tenants and continued participation in the program.

Program Administration

Prioritizing Equity and Racial Justice in Programming

All grantees are encouraged to prioritize equity and racial justice in their grant programs.

This means that grantees must proactively consider steps to ensure that their grant programs are designed and implemented in a representative fashion in the communities they serve with racial justice at the forefront of their service delivery plan.

1. Grantees must **proactively** ensure that their grant programs are accessible to all eligible individuals and organizations, regardless of race, color, national origin, religion, sex, familial status, or disability.
2. Grantees must take proactive steps to reach out to and engage with communities that have been historically underserved or marginalized.
3. Grantees must ensure that their grant programs are designed and implemented in a way that considers and values equity and racial justice. This may include, but is not limited to:
    - Providing targeted outreach and support to historically underserved or marginalized communities.
    - Ensuring that application review and selection processes are fair and unbiased.

- Providing technical assistance and support to help grantee(s) build their capacity to ensure equity and racial justice

4. Grantees must comply with all applicable fair housing laws and the equal protection clause of the 14th amendment to the US constitution. Please consult your legal counsel for advice in program design and determining criteria for participant eligibility.

Participant Program Education

Once a household is determined eligible and selected to receive assistance, programs must discuss with the participant in a briefing or other format, participants responsibilities as well as those of the program and landlord, and provide tenant with an opportunity to ask questions and make an informed decision about receiving assistance.

Subjects covered in the briefing should at a minimum include:

- Roles and responsibilities of tenant, landlord, and program.
- The process for calculating tenant and program portions of the unit rent.
- Time limitations for locating a unit.
- Confidentially and Release of Information
- Grievance and Appeals Process
- Reporting Household and Income Changes
- Fair Housing information, including any search assistance that may be available and the process for filing a complaint in the case of possible discrimination.
- Subgrantee's policy regarding moves and termination of assistance
- Inspection requirements
- Lead-based paint information, if applicable.
- **Violence Against Women's Act (VAWA) Information**
- It is best practice to provide the applicant, at the time of briefing, a coupon, voucher, or other document which provides program information and rent/utility limitations which may apply in a new tenant's housing search.
- Any other policies related to their rental assistance.

Fair Housing Informational Documents:

- **Oregon Residential Landlord/Tenant Law**
- **Oregon Fair Housing Law**
- **Housing Discrimination under The Fair Housing Act**

Income and Subsidy Determinations

Income re-evaluation is an area where programs may use flexibility and help reduce barriers to households and implement policies that are not as restrictive.

Most Public Housing Authorities (PHA's) operating the Housing Choice Voucher Program require either an annual or biannual income re-evaluation. The LTRA program recommends that income reevaluations occur every two to three years to support household stability and reduce program and staff administrative burdens. Programs should consider longer periods for households on fixed income such as social security retirement benefits, SSI, or SSDI as the fluctuations tend to be lower than those who are not on fixed incomes.

- Programs should provide various options or methods for households to submit any request for income re-evaluations. i.e., on-line version, in person, mail, fax, or submitted on behalf of participant through a third party.

- The determination of the households' share of total housing costs and the program's assistance payment, usually referred to as subsidy, is typically a two-step process. It is important to provide the participant information on the estimated maximum amount the household is expected to contribute toward housing costs and the maximum subsidy that the program may pay. This information is important for a household to search and select an appropriately priced home within the voucher term. The final calculation of the family's share of the housing costs and the program assistance amount cannot be completed until the family has selected a unit.
- It is recommended that programs use one consistent rent calculation for all households, for example, 28.5% of gross income.
- Programs may utilize net income (after tax income) or implement income deductions/expenses if policies outline clear allowable deduction/expenses guidelines to determine net income.
- To provide participants transparent and clear subsidy determinations, programs should consider simple rent calculation formulas and not incorporate a payment standard element to the subsidy determinations. An example to consider:
    - Four numbers used in rent calculation.
    - Contract Rent
    - Utility Allowance (utilizing utility allowance schedule)
    - Gross Rent (rent + utility allowance)
    - 28.5 % Gross Monthly Income

Contract Rent: 1 bedroom	**$1,200**
Utility Allowance: credit based on average utility cost	$115
Gross Rent	$1,315
Household Income	**$914**
28.5% Gross Monthly Income	$260

What Home Forward Pays

Gross Rent	$1,315
28.5% of HH Income	-260
Rent Assistance	**$1,055**

What Tenant Pays

Contract Rent	$1,200
Rent Assistance	-1055
Tenant Rent Portion	**$145**

Utility Allowance

Tenant's contribution is intended to cover both rent and utilities. If all utilities are included in rent, tenant's entire contribution goes to landlord. However, most tenants pay separately for at least some utilities. In such cases, programs must determine how much of the tenant's contribution should pay utilities and how much should be sent to landlord as rent subsidy. To determine the portion of costs that will be paid by the program and the portion that will be paid by tenant, programs must establish a utility allowance schedule.

- Allowance schedule estimates the average cost of utilities for typical types of housing (single family, row house, high-rise, etc.) and for various utilities and fuel sources (gas, oil, electricity).
- Utilities included in the schedule generally include those required for water/sewer, electric, gas and trash. Air conditioning and internet should also be included.
- Telephone and cable TV/Streaming Services are not considered utilities for this purpose.
- Programs can adopt the utility allowance schedule that the local PHA uses for its Housing Choice Voucher Program, or establish their own schedule based on a survey of typical utility costs in the area.
- The LTRA program should factor in the reasonable cost of utilities paid separately when calculating rent contributions. The program will allow for participants to be reimbursed for the amount that this utility cost exceeds their rent contribution based on the utility allowance schedule. Any reimbursement toward the utility costs can be paid directly to the utility, property management company or the household at the program's discretion.

Rent Reasonableness and Fair Market Rent Standards (FMRs)

Ensuring rent reasonableness is very important for effective program operations. If a program approves rents that are too high, funds are not maximized and can limit housing subsidies.

Alternatively, if rents are approved at levels lower than comparable units in the private market, better owners and higher quality units are discouraged from participating in the program. In addition, households may be inappropriately restricted in where they can live.

- Units must be “rent reasonable” as defined by HUD standards. Additionally, rent at initial lease up shall not exceed 120% FMR to contain program costs. A base rent worksheet should be used to assist applicants and landlords to easily understand the maximum contract rent allowed.
- Programs should set rent reasonableness standards based on the market rent of other similar units. Rent reasonableness standards govern the amount of rent acceptable for the unit. Programs must determine what review method(s) they will use to establish the rent reasonableness standards for their areas.
- Programs must consider the location, quality, size, type, and age of the unit, and any amenities, maintenance, and utilities provided by the landlord.
- A list of comparable rents can be compiled by using a market study of rents charged for units of different sizes in different locations or by reviewing advertisements for comparable rental units.
- Comparable rents vary over time with market modifications. Rent reasonableness standards must be reviewed periodically and adjusted to conform with these changes.
- Many landlords will request a rent increase during or at the end of a lease period. Programs must again determine that the proposed rent increase is reasonable in comparison to rents charged for comparable, unassisted units.
- Programs may also adopt Small Area Fair Market Rents (SAFMR’s) that may better reflect neighborhood rents more accurately than metro-level FMRs.

Sample Documents and Forms

- Not exceeding 120% Fair Market Rent (FMR)
- Sample Rent Reasonableness Worksheet
- Rent Reasonableness Checklist and Certification (hud.gov)
- 2.6-Rent-Reasonableness-Form.pdf (endhomelessness.org)

Inspection Requirements

The LTRA Program supports the provision and access of “decent, safe and sanitary” housing at an affordable cost to households accessing the program.

Inequities in safe, stable, and affordable housing fuel inequitable health outcomes. Poor housing conditions—such as water leaks, poor ventilation, and inadequate heating and cooling—can contribute to lead exposure, asthma and respiratory conditions, increased rates of injury and mortality, and more.
These health risks are more pronounced in low-income and communities of color. Inspections are vital for ensuring renters have access to safe, healthy housing.

- Inspections to assess unit quality will be required to unit eligibility before rental assistance or security deposit assistance can be provided.

Minimum Inspection Requirements

Minimum Inspection expectations are set as follows:

- Programs must utilize HUD's **Housing Quality Standard (HQS)** or **National Standards for Physical Inspection of Real Estate (NSPIRE)** to complete unit inspection requirements.
- Inspections should be conducted by approved HQS/NPSIRE inspectors, or by those who have completed a professional inspection training program, or persons employed as a local housing authority inspector.
- Programs should include Lead Based Paint requirements as part of the inspection process. For units older than 1978 which will house one or more children under the age of 6, landlord and tenant would complete a Lead-Based Paint Disclosure form. Sample form: **Disclosure of Information on Lead-Based Paint and/or Lead-Based Paint Hazards (epa.gov)**
    - The form should describe any known current or previous lead-based paint hazards, and documents tenant's receipt of records and the **lead hazard information pamphlet.**
    - A visual lead-based paint assessment should be completed by a person trained in this inspection process. The inspection can be completed in conjunction with the HQS/NSPIRE inspection if the inspector is qualified.
    - At Intake, it must be noted on the application form if there will be any child in the household younger than 6 years. This information can be provided to the inspector prior to their examination of the proposed rental unit.

Exceptions for Inspections:

Exception for Alternative or Interim Inspections may include inspections on units that were completed through an alternative program. Client file must document that unit inspection requirement was met with an alternative source and that source and the inspection must be noted.

Examples of alternate program types that may help meet inspection requirement:

- REAC (Real Estate Assessment Center)
- Affordable Tax Credit
- Rural Housing Service
- Home Investment Partnership Project
- LIHTC (Low-Income Housing Tax Credit)

Streamlining Inspection Process

- To reduce inspection delays, LTRA programs may consider allowing dwelling units to meet inspection requirements if they have been inspected in the past year and inspection documentation can be provided.

- Programs may also consider using **Housing Stability Minimum Habitability Standards** in circumstances where an inspection had previously been completed or HQS or NSPIRE inspection would delay or place households at risk of homelessness. Units must be in safe and healthy condition and would require an HQS or NSPIRE inspection after move-in.
- Programs may consider conducting inspections virtually through remote virtual inspections (**RVIs**), which have the potential to support efficiency and capacity needs.
- *Units that fail inspection*: Programs should determine policy to address failed inspection. It is recommended that if the unit initially fails inspection, the contract and lease agreement cannot be executed until landlord has made all repairs and the unit has passed a follow-up inspection. Programs may designate certain items that would allow for move-in and the ability to be corrected after move-in if items do not present a safety or health hazard.
- *Programs should also determine a policy for annual/bi-annual unit inspections* and failed non-initial inspections.
- Landlords can be given a reasonable period (e.g., 24 hours for emergency conditions or 30 days for less serious conditions) to correct the deficiency/ies. If the landlord fails to make the needed corrections, programs may determine options such as:
    - Temporarily suspend its payments until landlord remedies the deficiency/ies. These policies should be outlined in the landlord contract.
    - If a unit does not pass inspection for health and safety reasons and it is determined the household may not safely reside in the unit, the program should provide support for the household to temporarily re-locate while safety/health hazards are being addressed. Programs should only cover the expenses of re-location as an allowable expense when all other means to address the repairs with the landlord have been exhausted and households' health and safety are compromised.
    - Programs should determine a timeline by which a household will need to re-locate permanently to another unit if the unit issues are not being addressed.
- *Special Inspections*. A special inspection may be requested by the owner, the household, or a third party because of problems identified with a unit between any annual/bi-annual inspections.
- *Exit inspection*. If requested by the owner within the program designated time i.e., 48 hours from family's departure from the unit. The inspection may help to meet the requirement of Landlord Guarantee Fund (LGF) program, if applicable.

Participant Changes Impacting Service Delivery

Income Changes

As described in the Referral Criteria-Income Limits section of this guidance, OHCS is requiring established initial program eligibility income limits be set at 80% AMI or below. However, household circumstances may change after the initial application or between income re-evaluations.

Therefore, programs should determine what kinds of information about changes in household circumstances must be reported and under what circumstances. Programs then should process interim reevaluations to reflect those changes. Program participants should be provided with clear information on any required reporting requirements related to income changes.

Policies for reporting changes allow for administrators to adjust payments based on income increases or decreases. If income increases, for example, tenant portion increases so more program funds are available to serve additional households and a household is gradually transitioning to paying full rent without risk of homelessness.

Recommended circumstances for reporting changes:

Household Income Increase

- Households that did not have any countable income (zero income) at time of application, should report new income within a determined number of days of the date the change takes effect. Programs would then conduct interim re-evaluations in these cases to determine household rent portion.

  The effective date of the change must provide sufficient time for the household to plan for the increase to their portion of rent. i.e., 30-60 days or more to provide further flexibility.
- When an adult household member with countable income is added to the household, an income re-evaluation should be completed to determine if the household's portion of rent will increase.
- Any other income increase should not require a report change or income re-evaluation. Examples may include:
  - A current household member obtains a new job with higher wages.
  - A current household member receives a pay increase.
  - A current household members benefits increase. i.e., cost of living
- Programs should provide various options or methods for households to submit any request for income changes. i.e., on-line version, in person, mail, fax, or submitted on behalf of participant through a third party.
  - Sample Income Increase Form

Household Income Decrease

- When a household member with countable income leaves the household an income re-evaluation should be completed to decrease the family's portion of rent.
- It is recommended that the change to the household portion of rent be made effective the following month after the household reports the change. Programs should determine the day of the month that participants must submit the income decrease to make the change the following month.

- When a household member with countable income experiences a decrease in income such as job loss, decrease in hours, decrease in wages, or benefits decrease.

    - Sample Income Decrease Form
    - Sample Report Change

Income Re-evaluations

Income re-evaluation is an area where programs may use flexibility and help reduce barriers to households and implement policies that are not as restrictive.

Most Public Housing Authorities (PHA's) operating the Housing Choice Voucher Program require either an annual or biannual income re-evaluation. The LTRA program recommends that income re-evaluations occur every three years for households on fixed income such as social security retirement benefits, SSI, or SSDI. Fluctuations tend to be lower than those who are not on fixed incomes. This will help to support household stability and reduce program and staff administrative burdens.

- Programs will be required to determine local policies for income re-evaluations. These policies should be provided in writing and be included as part of the recommended Program Participation Education sessions outlined in this guidance.

- Programs should provide various options or methods for households to submit any request for income re-evaluations. i.e., on-line version, in person, mail, fax, or submitted on behalf of participant through a third party.

Household Composition

- Household members can be added to an LTRA contract at any time if the household *still meets the programs outlined eligibility criteria and unit occupancy requirements* and new household members are able to be added to the lease agreement. As outlined in the Documentation Guidelines section of this Guidance, Citizenship status and criminal background will not be assessed as part of the LTRA program and documentation will not be required.

Programs should provide differentiation between a guest and a household member. Typically, programs should align with the lease agreement guest policy.

Programs should at a minimum determine the following program policies for factors related to household composition changes.

- The addition of a household member because of birth, adoption, or court-awarded custody. Determine if the households share of the rent will change based on adding a household member who has income and the effective date of any change.

- If a change in family size causes a violation of **Housing Quality Standards** or **(NSPIRE)** Standards, outline program household options.
- Policy to add live-in aid, foster child, or foster adult. This includes any person not on the lease who is not an approved guest. Note that live-in aide income should not be counted towards total household income.
- A program must provide notification policies for any decision to deny approval for the request to add a household member and the reasons for the denial.
- Policies for departure of a household member from the household should include:
    - Reporting timelines when households should report changes.
    - Effects if any to household unit size or rent portion due to any departure.
    - Policy should include a household member departure who has been considered temporarily absent or a family member who left the household and is requesting a return.

        - Sample HH Member Form
        - Sample Request to Add Child
        - Sample Adding Adult Form

Temporary Absence

Program policies should be established to addresses situations of extended absence or abandonment of a unit.

- Programs should determine if the income of household member(s) approved to live in the unit should be counted, even if a household member is temporarily absent from the unit.
- Generally, an individual who is or is expected to be absent from the assisted unit for 180 consecutive days *or less* is considered temporarily absent and continues to be considered a household member.
- Generally, an individual who is or is expected to be absent from the assisted unit *for more* than 180 consecutive days is considered permanently absent and no longer a household member.
- Exceptions to this general recommended policy could include:
-
    - Absent Students. When a full-time student who has been considered a household member attends school away from home, the household may either remove the person's name from the lease and from the voucher or retain the person as a household member, unless the student has established a separate household by entering another lease.
    - Absences Due to Placement in Foster Care. Children temporarily absent from the home because of placement in foster care should be considered members of the household.

- Absences Due to Incarceration. If the household is a single person household and is incarcerated, programs should determine policies to allow for the same criteria as other extended absence situations. (i.e., 180 days absence). A requirement may be that documentation from the court or institution indicating the length of incarceration be provided.
- Absence Due to In-patient treatment, hospital, or nursing home stay. Programs should strive to support transition into care and treatment when necessary for overall well-being of the participants without instituting burdensome housing restrictions.

- Programs should also determine policies to address a request to allow for a previous household member to return to the household. Programs should offer flexibility wherever possible to support household and individual housing stabilization.
- The household should be informed of necessary reporting requirements and provide information to the program related to the absence from the unit, such as the notification of absence or documentation of residency as required per program policy.

Unit/Bedroom Size

Programs will determine the number of bedrooms needed for households of different sizes and compositions. This will help determine the unit size households should receive, and the policies that govern making exceptions to those standards. Programs should also establish policies related to the issuance of the voucher, to the voucher term, and to any extensions of the voucher term.

- Programs should collect information on the number of individuals living in the household. This information will be used to help to ensure households access housing/units that accommodate their household size, generally following **Housing Quality Standards** or (**NSPIRE**) Standards.
- In determining household unit size, the program shall offer an exception to its established standards if determined that the exception is justified by the age, sex, health, handicap, or relationship of family members or other personal circumstances.
- Reasons may include but are not limited to:
  - A need for an additional bedroom for medical equipment
  - A need for a separate bedroom for reasons related to a family member's disability, medical or health condition.
- A household may select smaller units if that arrangement will not create seriously overcrowded conditions.
- Households may also select larger units, and programs may determine if rent assistance will not be increased to cover the cost of the larger unit.

Participant Transitions in LTRA

Program Transfer/Portability

"Portability" refers to the process through which a household can transfer or "port" their tenant based rental subsidy when they move to a location outside the jurisdiction of the agency that first gave them the voucher when they were selected for the program.

OHCS believes that portability is a critical element of a long-term rent assistance program, however, at present, portability is not permitted until all local LTRA programs are operational and OHCS convenes a workgroup to jointly determine portability policies.

The workgroup will create policies to outline procedures and implementation requirements to include:

- Portability request timelines
- Portability request process
- Administrator Roles and Responsibilities
- Document Requirements
- Billing, Reporting, and Data Collection

“Transfers” refer to a process through which a household can utilize their voucher to move to another unit within the same jurisdiction that issued the voucher.

- Transfers within a program's jurisdiction is an allowable option for LTRA voucher holders. Programs must determine local policy for their program transfer requirements.
- LTRA vouchers may not be utilized outside the State of Oregon

Ending Program Participation

Rent assistance for a program participant household may end due to a violation of program rules or conditions of occupancy.

The LTRA program’s intent is to avoid termination unless necessary, therefore every effort to mediate issues and/or concerns that may impact a participants access to rent assistance, must be exhausted. . Program partners must collaboratively work to preserve participant household access to the LTRA Program by:

- Providing all households with written copies of program rules, in the preferred language of the household member(s), upon move in.
- Ensure participant households relate to the supportive services, initially and ongoing, necessary to maintain the housing stability.
- Evaluate all circumstances to determine violations are serious enough to warrant termination of rent assistance in only the most severe cases.
- Offer mediation/counseling services prior to termination of assistance.

Programs must create policies to determine criteria for when rent assistance may end. Elements to consider in creating policy:

- Household no longer requires assistance. As a household income increases, the amount of the housing assistance payment decreases.

  If the amount of assistance provided by the program is reduced to zero, the household's assistance may end, and programs should determine how long after the determination must households exit the program. A typical period is 180 days after the last housing assistance payment.
- Household chooses to end assistance. The household may request that the program end their housing assistance payments and should be able to request at any time.
- Evictions: The program will need to determine how evictions will affect assistance whenever a household is evicted from a unit assisted under the program for a serious or repeated violation of the lease. For example: If a household moves after the landlord has given the household an eviction notice for serious or repeated lease violations but before a legal eviction order has been issued, termination of assistance should not be mandatory.
- Failure to comply with any program requirements or policies.
- Absence from a unit over the amount specified in program policies.
- Violence against Women Act of 2013 (VAWA) explicitly prohibits from considering incidents of, or criminal activity directly related to, domestic violence, dating violence, sexual assault, or stalking as reasons for terminating the assistance of a victim of such abuse.

Reinstatement

An exit from the LTRA program should not necessarily disallow the participant or household member from receiving assistance later. Households must receive information about their grievance and appeals rights in alignment with the Grievance/Appeals Procedure section of this guidance. At a minimum the program should allow for reasonable accommodation requests to be reinstated back in the program.

Programs should incorporate flexible policies to allow individuals and households to apply for reinstatement. Examples should include:

- Reinstatement for when a household member leaves the unit and wants to return.
- Reinstatement after program violations
- Reinstatement after exiting due to family absence from a unit.
- Reinstatement after eviction
- Reinstatement after a household's assistance ends because of no longer needing subsidy and the time period to report a change has passed.

General Program Requirements

Privacy Notification

Grantees and grantee(s) must have a written document that meets the requirements of this section and must have a stand-alone policy that describes how the Grantee or grantee(s) are providing their Privacy Notification verbally to applicants/participants.

A Privacy Notification must be provided to applicants/participants either verbally or in writing that identifies the following:

"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 will be shared with Oregon Housing and Community Services and other state agencies 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 will be disclosed to Oregon Housing and Community Services without written authorization."

Applicants/Participants may also be asked to sign a Release of Information by the Grantee or grantee(s) that includes the Privacy Notification. If required to sign a Release of Information, in addition to the information above, such form must include a statement that:

"Refusal to sign such authorization cannot be the basis for denying program services to otherwise eligible applicants/participants.

Applicant/Participant refusal to sign a Release of Information does not negate the inclusion of personally identifiable in secure reporting to Oregon Housing and Community Services. Oregon Housing and Community Services will de-identify applicant/participant demographic data for the purposes of reporting".

Grantees and their grantee(s) must document in the applicant/participant file that a privacy notification was provided to the applicant/participant either verbally or in writing. For all other purposes of collecting personally identifiable information, Grantees and their grantee(s) must follow state and federal laws for the collection, use and sharing of applicant/participant information.

Grantees must ensure that grantee(s) have policies that align with OHCS requirements and are consistent with the intent of such a policy as outlined by OHCS. OHCS retains the right to require modification of any policy that in its determination does not meet requirements of the policy.

Confidentiality

Confidential records include all applications, records, files, and communications relating to applicants and regardless format.

Policies and Procedures pertaining to confidentiality must include:

1. Identification of how all applicant/participant records are secured and confidentially maintained.
2. A statement that all applicant/participant records must be maintained within state guidelines for the proper retention and destruction of records.
3. A requirement that all Grantee officers, employees, and agents are aware of and comply with the Grantees' confidentiality policy and must include an acknowledgement of such policy, in writing.
4. A provision for the electronic collection of applicant/participant information which states that:
    a. Computer terminals must be in a secure location, limiting access to only those persons who have a legitimate interest in and are responsible for applicant/participant records.
    b. Computer monitors must be cleared (or a screen saver activated) immediately after accessing a(n) applicant/participant record.
    c. Computer terminals must be on a "locked" mode or turned off if the terminal is unattended.
    d. Access to personally identifiable HMIS data shall be given to only authorized personnel as necessary for performing the work required for OHCS-funded programs.
    e. A statement that all records shall be open for review to federal and state authorized representatives, and auditors and/or examiners during their regular audits and monitoring functions of OHCS funded programs.

Grantees must ensure that grantee(s) have policies that align with OHCS requirements and are consistent with the intent of such a policy as outlined by OHCS. OHCS retains the right to require modification of any policy that in its determination does not meet basic principles or requirements of such a policy.

Grievances and Appeals Procedure

Grantees are required to have an established, written stand-alone policy for addressing applicant/participant grievances/appeal requests. Grantees must ensure that sub-grantee(s) 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 Grantee 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, to include the grantee website; however, applicants/participants must receive a verbal documented or written notification, in their preferred language, for any decision that terminates, denies, limits, reduces or modifies any benefit. Written notification via email is acceptable.

Any person or persons designated by Grantee and grantee(s) can complete the administrative review/appeal, other than the person who made or approved the decision under review/appeal or a subordinate of this person.

Applicants/Participants must still receive a denial notification even if the reason for denial is a Grantee's/grantee's lack of funding. At a minimum, the policy must include the following components:

1. Informs the participant/applicant that they can contest any Grantee's or grantee's decision that terminates, denies, limits, reduces, or modifies any benefits and identifies the steps to follow to contest the decision.
2. Informs the participant/applicant of the reason for termination, denial, limitation, reduction, or modification of benefit.
3. Allows any aggrieved person a minimum of thirty (30) days to request an administrative review/appeal of such decision:
4. 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;
5. Identifies what reasonable accommodations are available for applicant/participants who have language, mobility or disability barriers that would prevent them from participating in the review/appeal process and how to request such accommodations; and
6. Informs the applicant/participant and OHCS in writing of the final determination and basis for the decision within ten (10) days of the final determination.
    - A statement indicating whether and under what circumstances an order by default may be entered.

OHCS retains the right to require modification of any policy that in its determination does not meet basic principles or requirements for such a policy.

Nondiscrimination

Grantees are required to comply with all state and federal statutes relating to nondiscrimination. Grantee must have a stand-alone policy that complies with the following:

1. A statement that Grantees will comply with all state, federal or local statutes, rules and guidelines for all protected classes and will not take any of the following actions based on race, color, national origin, age, religion, gender, familial status, or disability (federal) or victims of domestic violence, 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; or
    - Deny anyone access to a facility or service; and
2. Identifies how applicants or participants can request reasonable accommodation to access assistance or services, how that process is communicated to applicants and participants and how those requests are processed.

Grantees must ensure grantee(s) have policies that align with OHCS requirements and are consistent with the intent of such a policy as outlined by OHCS. OHCS retains the right to require modification of any policy that in its determination does not meet basic principles or requirements of such a policy.

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 applications or provide information on services or available housing to any protected class, even if these groups do not fit into the targeting strategy, is prohibited.

Screening criteria cannot be discriminatory and must be consistently applied. A **priority population** means persons that are determined to have the greatest need and will receive services first; however, priority cannot be used as means of denying any person assistance and refusal to refusal to accept applications or provide information on services, or available housing, to any protected class, even if these groups do not fit into the priority population, is prohibited. For example, a provider might decide to give priority to applicants/participants who graduate from a tenant readiness education program that is inclusive of all protected classes.

If two requests come in at the same time and both meet the screening criteria, the applicant/participant who also has the tenant readiness education experience could receive priority over the applicant who does not; however, providers must always accept the first request meeting their criteria or prioritization policy.

Grantees and their grantee(s) must adhere to such prioritization required by OHCS.

For more information, see the Guide to Fair Housing for Homeless and Domestic Violence Shelter Providers produced by the Fair Housing Council of Oregon, or contact them directly at www.fhco.org.

Limited English Proficiency

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

Grantee must have a LEP stand-alone policy that describes the following:

1. The actions Grantee took to identify LEP populations in their service area and cites any source(s) used for evaluation;
2. Defines actions Grantee will take to provide language assistance and address language barriers;
3. States how and how often staff will receive training about assisting LEP persons; and
4. Identifies that, minimally, LEP populations are evaluated biennially and that updates to the LEP Policy incorporates any needed changes to address new or emerging LEP populations.

Grantees must ensure that grantee(s) have policies that align with OHCS requirements and are consistent with the intent of such a policy as outlined by OHCS. OHCS retains the right to require modification of any policy that in its determination does not meet basic principles or requirements of such a policy.

Grantees and grantee(s) can 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 grantee(s) who serve few persons needing LEP assistance can choose not to establish a LAP; however, the absence of a written LAP does not release Grantee's and grantee's obligation to ensure LEP persons have access to programs or activities.

Conflict of Interest

In the performance of work, program grantees and grantee(s) will create no potential or actual conflict of interest, as defined by ORS Chapter 244, for a director, officer, agent, or employee of Grantee or grantee(s). A conflict of interest exists if, among other things, a decision or recommendation could affect the finances of the Grantee's or grantee's officers, agents or employees or the finances of their officer's, agent's, or employees' relative.

If a conflict of interest exists, the Grantee's or grantee's officer, agent or employee must always give written notice of the conflict, and in some situations the officer, agent or employee is restricted in their ability to participate in the matter that presents the conflict of interest.

No Grantee or grantee(s) officer, agency or employee may carry out the initial evaluation required to obtain services for any person in which an actual or perceived conflict of interest does or would exist, unless in rare circumstances it is in the interest of the participant for the expediency of housing placement services or to create a seamless service delivery while keeping the participant engaged in services and such situation is documented in the participant file.

Grantee must have a conflict-of-interest policy that outlines the process for disclosing, in writing, any potential or actual conflict of interest. This includes procedures for staff when employees, board members, friends or family members apply for program services.

Grantees and grantee(s) must comply with conflict-of-interest standards for both individuals and organizations. Grantee and grantee(s) must keep records to show compliance with program conflict of interest requirements.

Determination of Insufficient Funding

OHCS requires that Regional Administrators enact a policy that ensures the Regional Administrator is responsible for tracking the available funding compared to total expenditures on a monthly basis. This policy may mirror other policies for Federal funds that may be utilized, including the Housing Choice Voucher program. If funding is determined to be insufficient, the Regional Administrator may deny families permission to move and to terminate rental assistance contracts with households. Insufficient funding may also result in the inability to further provide additional assistance to new households. If a Regional Administrator determines that the LTRA program has insufficient funding, notice must be given to OHCS within 10 business days of the determination with information about what actions the Regional Administrator will take to mitigate the insufficient funding.

Program Reporting & Recordkeeping Requirements

Data Entry

Subgrantees and their subrecipients are required to enter LTRA related data into the Service Point Homeless Management Information System (HMIS). Victim Services Providers, serving survivors of domestic violence, are also required to collect client data, but will not directly enter data into an HMIS. Victim Service Providers must enter client- level data into a comparable database that complies with HMIS requirements. Subgrantees and subrecipients are responsible for acquiring and documenting informed written consent from program participants and protecting program participant's confidentiality.

Subgrantees and their subrecipients are required to enter reliable, valid, and accurate LTRA related participant and service data into HMIS.

Both an HMIS entry/exit and HMIS Service Transaction to be entered into HMIS. Each allowable service must be represented with a Service Transaction. Same day services will have the same Service Start and End Date. Service Transactions for LTRA program costs, including all payments, arrearages, deposits, fees, landlord engagement and client noncategorical services, must include a HMIS Fund Source and Amount.

Data Timelines

Timely and accurate data entry is critical to ensuring meaningful data analysis and reporting. For all project types, subgrantees and subrecipients must enter data within 72 hours or sooner, depending on local CoC HMIS policies.

Required Data Elements

Refer to LTRA column for required Data Elements: Data Collection Requirements FY23-25.pdf(oregon.gov) (LTRA will be added to the crosswalk).

Clients who enter program and reside in a living situation that meets the homeless definition of Category 1 or 4, must be entered into a LTRA Rapid Rehousing (RRH) project with the RRH required data elements collected. If a household enters program, with a living situation of *anything other than* Category 1 or 4, the household must be entered into a LTRA Homeless Prevention (HP) project with the required HP data elements collected.

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.
- 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.

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 subgrantee or subrecipient's intake/assessment process.

File documentation will be the basis of OHCS monitoring to ensure subgrantee and subrecipient follows program requirements and regulations. OHCS recommends that subgrantees and subrecipients use a client file checklist to ensure adequate documentation of case files.

Records Access

Subgrantees and their subrecipient 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 subgrantees' and subrecipients' office.

Records Retention

Subgrantees and subrecipients shall retain all program records pertinent to client services and expenditures incurred under LTRA 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**).

Subgrantees and subrecipients 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, such longer period as may be required by applicable law, whichever date is later. Applicable law includes the following final payment and termination of LTRA funding, or until the conclusion of any audit, controversy or litigation arising out of, or relating to LTRA funded programs.

LTRA Allowable Expenses/Budget Categories

Planning & Capacity Building	The specific focus of capacity building is to further enhance and/or expand the activities established in the Community Plan through their identified prioritization subpopulations who are disproportionately experiencing homelessness in their community. Supporting organizations with mentoring, finance, strategy building, and system analysis are a vital part of capacity building.
Research and development	Grant program design, research to determine community needs and service delivery best practices, third-party development and programming, software development costs, pilot programming, and program testing.
Program implementation planning	Planning activities related to preparing to implement the program. Planning meetings, events, onboarding, and training expenses.
Equity and accessibility efforts	Expenses tied to accommodations and efforts to ensure the program is delivered equitably based on quantitative data and qualitative community input, gathered through the homelessness response system and have been identified to have a disproportionately high risk of experiencing unsheltered homelessness. Expenses tied to building equitable service delivery into the program design and ensuring the program is accessible to those who are differently abled or lack the resources to engage in the traditional platforms/points of program entry.
Training & Technical Assistance	Staff training related to the development and implementation of the grant program. This includes training materials, training space rent and expenses, equipment, and transportation.
Personnel – LTRA Administrator and Staff Time	Staff wages, salaries, and employment benefits for staff who deliver services and those who directly oversee program operations. i.e., Skilled, Trauma Informed, Diverse Workforce.
Program evaluation	Regular evaluation of program efficacy, outcomes, generating reports, charts, and visualizations. May include materials and expenses tied to these efforts.
HMIS and data system expenses	Set up and maintenance of HMIS access and utilization. This includes hardware, set-up fees, maintenance, software, subscription fees, and training needs.
“Hotline” and/or In-Person Environment Improvements	Telephone and web-based data systems, call routing, tracking and data collection. On-site service delivery to include trauma-informed spaces to allow for private discussions.

Administrative Costs - 15% of total award unless OHCS approves a differential in Community Plan.
Costs and expenses associated with the administration of the grant. This can include direct and indirect costing of Operations, IT, Executive Team, Human Resources, and Finance expenses tied to administering the program.
Direct to Program Non- Personnel expenses tied to the operation of the program as space rent, office supplies, equipment, and vehicle leasing tied directly to staff operating the program.
Indirect to Program Non- Personnel Expenses for program and overhead expenses, such as rent, utilities, office supplies, equipment, and vehicle leasing.

Outreach	Outreach and engagement are critical components of homeless service delivery. Although there is no single definition of outreach, experts agree that outreach is a process designed to contact individuals in non-traditional settings who might otherwise be ignored or underserved. Its purpose is to improve physical and mental health and social functioning, increase use of human services, and re-integrate people into the community
Outreach and engagement activities.	Outreach and engagement activities associated with the community served by the grantee.
Street Outreach Activities	Street outreach includes connecting with individuals and households experiencing homelessness who may be disconnected or alienated from supports and services and is focused on moving people into permanent housing without preconditions for receiving assistance.
Web, print, social media, and advertising	Program promotions, advertising and other housing related services provided by the grantee. i.e., web media, print media, social media advertising and promotional expenses.

Support Services	Funds may be used to help households achieve a greater level of housing stability and security. Costs under this category must be reasonable and sufficient to improve long-term housing stability.
Housing and Health Navigation Services	Housing navigation and housing education are services that help individuals and families experiencing housing instability or homelessness to identify opportunities and address barriers to housing.
Wrap-Around-Case Management – Staffing Support	The concept of “Wrap-around” programming is used to describe any program that is flexible, family or person-oriented and

	comprehensive. In a "Wrap-around" approach to case management, a team of professionals (e.g., educators, mental health workers, social workers, etc.) and key figures in an individual/household's life (e.g., family, community members, religious leaders, etc.) create, implement, and monitor a plan of support to help stabilize and sustain the household's housing goals.
Participant Support/ Education Meetings and Events	Meetings and events involving program participants as a part of the grant program to engage in supportive activities such as cohorts, services geared toward basic life skills information/counseling on money management, use of credit, housekeeping, proper nutrition/meal preparation, and access to health care (i.e., doctors, medication, and mental and behavioral health/SUD services to increase household stability and housing sustainability.
Work Supports	The purpose of work supports is to allow the household to stabilize by avoiding expenses in other areas that are a barrier to housing stability. (i.e., training costs; transportation costs; transportation assistance; childcare or eldercare costs; clothing to support employment needs, tech to support Wi-Fi access, phone/communication device, and phone service costs).
Transportation/Travel/Meals	Transportation Assistance includes but is not limited to;, train/bus passes, bus tokens, ride sharing, gas vouchers, Uber/Lift/Cab fares, auto repair/insurance are allowable and travel related expenses to support participant appointments for employment, benefits, medical needs, or any other related activity tied to their housing stability plan.; Meal expenses, and lodging tied to approved grant activities such to include out-of-area educational conferences. Travel is allowable as a direct program cost when such travel will provide direct benefit to the participant household or grant program.
Moving Expenses	Moving expenses related to a new housing unit or out of a housing unit that does not offer stability. Expenses can include moving truck, packing supplies, movers, and helpers for differently abled households
Household Goods	Furniture and household goods to support a household with moving to a new home (i.e., bedroom furniture, bedding, pots, pans, kitchen utensils, bath towels, seating, dining table, needed lighting, kitchen supplies, food supplies, bathroom supplies, personal protective equipment, etc. etc.)
Renter's Insurance	Households may benefit and be required to secure ongoing Renter's Insurance as part of their Lease Agreement. Renters' Insurance is an allowable expense and should reflect the most cost-effective option for coverage and the terms stated in the Lease Agreement.

Civil legal services (legal advice, legal representation, court fees)	Civil legal services are legal assistance to low-income households who have non-criminal legal concerns. Legal services may include: Mediation to help disputing parties to reach a mutually agreeable settlement. Arbitration to make a binding decision to settle a dispute. Preparation of legal documents. Representation of clients in negotiations, court, or arbitration.
Other Flexible Expenses	Other expenses designed to stabilize a household through supportive services may include flexible funds to support long-term housing stability, including connections to clinical services, health and wellness supports; employment and benefit supports and legal assistance, based upon the households' financial, health and wellness needs to sustain and stabilize their housing outcomes.

Rent Assistance	Financial assistance and/or subsidy to assist households with the cost of rent to increase housing access and long-term housing stability for people exiting homelessness. Direct payment assistance may not be utilized to cover rent payments.
Rent and utilities payments	Includes rent, utilities payments and potential arrearages to enable household/individual to access to and sustainability of housing.
Security deposits/Leasing Fees	Security deposit and fee payment in current unit or unit household is moving into to attain housing stability.
Pet rent, deposit, fees, and insurance	Pet rent payments and payments of security deposits for pets in housing units. Landlords are not allowed, under the federal Fair Housing Act, to charge fees and deposits to tenants who require the ability to reside in their home with their "Assistance Animal" to have equal access and enjoyment of their dwelling.

Landlord Partnership	Landlord participation rates affect the overall availability of rental options as well as the location and quality of available options, thus shaping the extent to which low-income households can access the intended benefits of LTRA housing assistance through Landlord incentives can be a valuable tool.
Landlord/Tenant Mediation Services	Mediation is a process in which a mediator assists and facilitates two or more parties to a controversy in reaching a mutually acceptable resolution of the controversy.
Landlord Incentives	Landlord Bonuses - One-time payments to landlords, may also include referral. Funds to cover costs such as bringing units up to HQS/NSPIRE standards, holding fees, security deposits, application fees, rental insurance, and related costs such as credit or background checks.
Landlord Liaison Support	Broker relationships between landlords and social service agencies for the benefit of households experiencing homelessness.

Definitions

Supportive Services are inclusive of:

- Intake and assessment, including time spent with a household to determine supportive and financial needs.
- Once an eligibility determination is made, "wrap-around" services work to connect households to resources within the organization, or external to the organization to connect with identified supportive service.
- Direct client services include developing an individualized housing and supportive service plan, ongoing monitoring and evaluating household stability, 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. This includes increasing access to earned income, or access to disability benefits programs administered by the Social Security Administration for eligible adults/youth who are experiencing or at risk of homelessness and have a mental illness, medical impairment, and/or a co-occurring substance use disorder.
- Housing Securement 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.

Gift Cards

Secured Cards issued to eligible households for the purpose of purchasing items must be in support of the household participants' housing stability goals and allowable under OHCS funding, provided that adequate documentation exists to support the purpose and the expense and there is an OHCS-approved Gift Card Policy with established policies and procedure in place to address the process.

Use of gift cards should reflect the unique specific housing-related goals of the household and when other payment options are not available. i.e., in the event a Landlord/Utility Provider refuses to receive third party payment.

Gift Card Requirements:

- The expense must be allowable under program guidance and must show a connection to housing stability. Programs will be monitored, and expenditures will be disallowed without sufficient documentation.
- Secured cards must be purchased and issued to the household participant within the same grant period. For any gift cards that are not issued to households before the close of the grant period in

which they were purchased, grantees must submit a negative request for funds for the grant period directly from the program. **Use of direct payment assistance should be rare, for very specific housing-related goals and only when other payment options are not available.**

Recommended alternatives to direct payment assistance:

- Third party payments from grantee or subgrantee directly to landlord, utility company or vendor on behalf of the participant/household.
- Partnering with bus or transportation services that bill for their eligible clients.
- Partner with vendors (stores/businesses) for a voucher system. A voucher is a document which is worth a maximum dollar value, and which may be used only for specific items in which the gift cards were purchased totaling the amount of the unissued gift cards and other non-OHCS funds must be used for the cost of the gift cards.
- Grantee must maintain complete record of gift card purchases and recipients. Gift cards must be kept in a secure location prior to being issued.
- Household participant(s) must receive documentation in their preferred language, that identifies the purpose and intent of the gift card and must acknowledge, by written, legible, wet signature, the same, and such documentation must be kept in the client's file.
- Grantee or subgrantee must develop a gift card policy and obtain OHCS approval that includes:
    - Justification as to why gifts cards are issued rather than helping through conventional means.
    - Authorization levels of approval for gift card purchase and issuance within grantee or subgrantee's organization.
    - Dollar limitations per client/participant
    - Frequency in which gift cards can be issued in lieu of other alternative payment options. Requirement that issuance of gift card is in support of a client's plan to increase housing stability and that plan is included in the client file.
    - Proper documentation: policy must require household participant-facing policy that identifies allowable purchases and use of gift card. Policy document must be signed as received and read by and client/participant. One copy should be provided to the household participant and one copy should be kept in households' file.

Direct Payment Assistance

OHCS funds housing services as well as supportive services for low-income households experiencing or facing housing instability in the state of Oregon.

Direct assistance payments allow participants the flexibility to meet a range of housing related needs without the complication of third-party payment systems navigated by service providers. Please note that direct payment assistance may not be utilized for rent payments.

- Grantee can allow for direct assistance if it can address the housing stability of the participant, is an allowable expense under the program guidelines, the grantee has developed an approved OHCS policy that clearly states the cases in which direct payment assistance is necessary and the reasons why there are limited alternative options in providing the service to the household.
- Grantees and subgrantees must make reasonable efforts to obtain the cooperation of landlords and utility providers to accept payments a specific vendor. Vouchers are very similar to purchase orders. In advance, the organization establishes agreements with a vendor under which the vendor agrees to accept a "voucher" at the point of sale and then invoices the organization for the actual purchase.
- Partner with clothing stores that will bill for clothing selected by eligible clients and the clothing can be picked up once the bill is paid (for example, Salem-Keizer Schools currently has this arrangement with Kohl's).
- Grantee/provider staff can purchase items for client either online or at a store/business using company credit card. Records of detailed receipts must be submitted for reimbursement.

Grantee or subgrantee must develop a direct payment assistance policy and obtain OHCS approval that includes:

- The business case for when direct payment would be considered, how it contributes to participant success, and aligns with case management for housing stability plans. i.e., is part of the tenant households independent living plan.
- Authorization levels of approval for direct payment approval and issuance to the household participant within grantee or subgrantee's organization.
- Dollar limitations per client/participant/household.
- Frequency at which direct payment assistance can be issued in lieu of other alternative payment options.
- Requirement that directs payment assistance is in support of the households' plan to increase housing stability and that plan is included in the client file.
- Process for staff to document each use of direct payment including:
    - How the amount of direct payment was calculated.
    - Why direct payment assistance was provided rather than conventional means.
    - Form of direct payment
    - Sign off for authorization of payment.
- Proper documentation: policy must require person-facing policy that identifies allowable purchased and uses of direct payment assistance.
- Policy document must be signed as received and read by household/participant. One copy should be provided to household/participant and one copy should be kept in participant file.