

**Allowable Costs Frequently Asked Questions
State-Funded Homeless Services Section Programs**

Subject	Question	Short Answer	Additional Information
Court fees	Client has a criminal conviction that they state is a wrongful conviction and are applying for assistance from the Oregon Innocence Project. They need a copy of a video recording of one of their court appearances and the court charges a \$25 fee for the recording – would this be allowable?	No	This is considered a debt payment and unallowable. Refer to Legal Aid: https://oregonlawhelp.org/
Rent Guarantee Insurance	Is Rent Guarantee Insurance that pays the landlord for damages to the property when the tenant leaves as a possible incentive to rent to our clients be allowable?	No	This is a new market that has opened up and is not a proven practice through reputable carriers as of yet. Policies have to be taken out on specific leases as opposed to specific properties, so a policy for each tenant would be needed. It is a rent specific policy that will pay unpaid rent only after 2 months of missed rent and only up to six months total, by which time it is likely that an eviction proceeding has already started so it would not help a tenant maintain or retain permanent housing. It does not pay late fees or damages. Additionally, the credit worthiness of the tenant can be considered by the carrier before a policy is written, which likely would be a barrier for low-income clients. It also unclear whether a policy could be taken out by a third-party, such as a CAA. OHCS would not cover a landlord’s insurance premium and there are many unanswered questions as to whether OHCS would allow this for a CAA. More input would be needed before OHCS would consider allowability, but currently, this is not allowable. Refer clients to the Rent Guarantee Program which can provide such guarantee as an incentive for landlords.
On-going Rent Assistance	Is ongoing rent assistance allowed?	Dependent upon program	In HTBRA, yes. In the Transitional Housing component of programs, where allowable, yes. For all other cases, no. Excluding rent arrears, the amount of assistance provided must be the least amount needed to stabilize clients in their permanent housing. Subgrantees and subrecipients

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			have the discretion to further set a maximum number of months that a client may receive assistance and the maximum dollar amount of assistance. The process for determining such conditions must be applied consistently for all households, incorporated into the subgrantee's and subrecipient's policies and procedures and communicated in advance to eligible clients.
Multiple Security Deposits	Can a security deposit be paid multiple times for a client in different homes with different funding sources?	Yes	There is not a restriction on the number of times a client may receive a security deposit nor a restriction on the braiding of funds; however, assess whether continuing to pay security deposits for this household, who is unable to maintain permanent housing is keeping your agency from assisting other households who may only need a single security deposit to maintain permanent housing. Security deposits for a clients cannot be made in multiple properties at the same time for any client.
Last Month's Rent	Is last month's rent allowable in HTBRA?	No	Other OHCS funds could be braided, such as EHA, to help cover any costs not covered by HTBRA.
Fines	Are fines associated with traffic violations allowable?	No	This is considered a debt payment and unallowable
Vehicle Purchase	Is the purchase of a vehicle for a client allowable?	No	This is considered asset building and unallowable, although a referral to the Individual Development Account program might be helpful.
Requirement for Client to Pay a Portion of Rent	Can we require a client to pay a portion of their rent?	Yes	OHCS does not require that clients pay a portion of their rent; however, subgrantees and subrecipients have the discretion to further set a maximum number of months that a client may receive assistance and the maximum dollar amount of assistance. The process for determining such conditions must be applied consistently for all households, incorporated into the subgrantee's and subrecipient's policies and procedures and communicated in advance to eligible clients.
Gas Card to Roommate	Can we provide gas cards to a roommate who provides transportation to our client?	No	Funds must be provided to clients who have been determined eligible to receive funding under OHCS program guidelines. Additionally, a gas card is cash-equivalent and such purchase must

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			be approved, in advance within an OHCS-approved Gift Card Policy.
Move Out Cleaning	We are assisting a client’s move to an affordable unit and she has requested help with cleaning the current unit for move out as she has 4 children under the age of 5 and would like to get her deposit back – is that allowable?	Depends	This expense is typically not allowed; however, if a client has a specific need which has been documented, such as disability, it may be allowable to issue such assistance through a Client Non-Categorical Service in state-funded programs. Such services are the rare provision of goods or payments of expenses not included in other allowable expense categories, which directly help a household to obtain or maintain permanent housing or meet a unique <u>essential</u> household need, as documented in the client service or housing plan and approved by the agency case manager’s supervisor. This <u>cannot</u> be a cash or cash-equivalent payment. Contact your OHCS Program Analyst for more information.
Pet Mitigation	We are working with a household who has received a couple of notices in their new affordable housing unit for their dog barking. We have been discussing and researching some options for items that might reduce the dog’s stress and reduce barking behaviors in order to address the complaints – would these purchases be allowable?	Yes	This could be allowable under the Client Non-Categorical Services option of state funding. Such services are the rare provision of goods or payments of expenses not included in other allowable expense categories, which directly help a household to obtain or maintain permanent housing or meet a unique <u>essential</u> household need, as documented in the client service or housing plan and approved by the agency case manager’s supervisor. This <u>cannot</u> be a cash or cash-equivalent payment.
Impound Fees	Are impound fees allowable to retrieve a client’s vehicle after it has been impounded?	No	This is considered a debt payment and is unallowable
Assistance Outside own Jurisdiction	Can we assist a client that resides in another’s CAA’s service area?	Yes	OHCS does not restrict assisting persons in another CAA jurisdiction; however, allocations are based on need factors, so the intent is to keep funds within the service area for which they were allocated. There may be specific circumstances for which another CAA may need to help facilitate assistance and this would be allowable. OHCS recommends that the CAAs connect with one

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			another to coordinate services and to provide convenient case management for the client.
Credit Card Fees	Some landlords will take credit card payments, but they are charged a fee for processing the card. Is this an allowable expense?	Yes	Costs must be necessary and reasonable for the performance of the award, must be consistent with your cost allocation policies and procedures, must be accorded consistent treatment, must be adequately documented and incurred during the budget period and cannot be used to meet any cost sharing or matching requirements of other programs. Such usage of a credit card over another form of payment should be written into your policies and procedures.