

Youth Emergency Housing Assistance (YEHA)

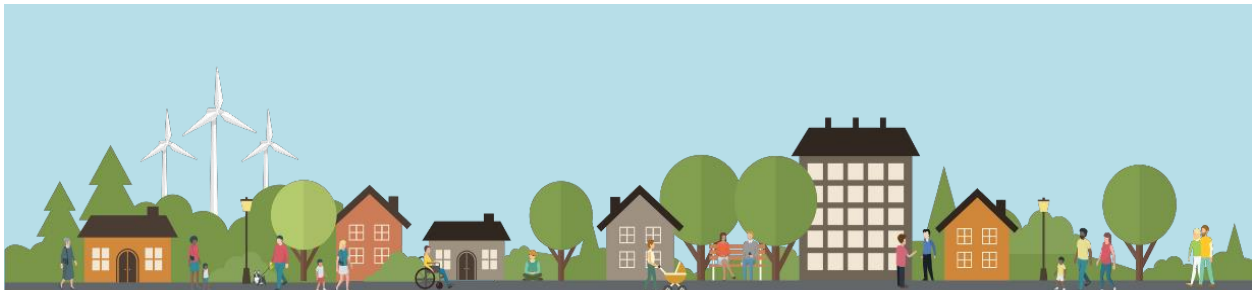


Program Guidance

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Change Log

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Introduction

Program Intent

The legislature appropriated \$5 million to OHCS in General Funds during the 2023/25 biennium to increase services and assistance to school-aged, K-12 children or their families who are experiencing homelessness or are at risk of experiencing homelessness through HB 5019. This new youth-specific funding represents an opportunity to grow and strengthen OHCS' overall support of youth and family housing stabilization efforts in partnership and alignment with YEHA funding. Funding has been directed to the "Other Funds" account and can span over into the next biennium.

HB5019 2023 Long Session Bill Language:

<https://olis.oregonlegislature.gov/liz/2023R1/Downloads/MeasureDocument/HB5019/Enrolled>

SECTION 13. In addition to and not in lieu of any other appropriation, there is appropriated to the Housing and Community Services Department, for the biennium beginning July 1, 2023, out of the General Fund, the amount of \$5,000,000 for deposit into the Emergency Housing Account created under ORS 458.620, for the purpose of providing services and assistance to school-aged children enrolled in kindergarten through grade 12 who are homeless or at risk of becoming homeless, or their families.

Purpose

Provide housing-focused services to school-age children K-12 and their families at risk or experiencing homelessness to enhance family stability and school success. Establish and promote intentional collaboration between the educational system and housing providers to extend a reliable family support network and optimize the impact of funding. Housing focused services refer, but are not limited to the following:

- Providing support aimed at reducing barriers, addressing housing needs, providing placement assistance and/or services to stabilize or improve their current housing situation.
- Prevent people from losing their housing and divert people from entering the homelessness service system.
- Quickly connect people experiencing homelessness to housing assistance and services tailored to their unique needs and strengths to help them achieve and maintain stable housing.
- Each grantee will be expected to create projects addressing homelessness and the risk of homelessness within its county's prioritized population by meeting their individual needs.
- Each grantee will report their needs to facilitate research that supports future funding/programs

Partner Collaboration Requirement

Partnerships and collaboration are key hallmarks of an effective homeless services and prevention systems. OHCS recognizes that people access help in a variety of ways and that trusted messengers are key to ensuring equitable access. Data also show clear trends that communities of color, female heads of household, LGBTQI-GNC individuals, and families are disproportionately impacted by homelessness nationwide. To that end, the YEHA program requires that grantees coordinate and interface with McKinney Vento liaisons and Educational Systems, and encourages interactions with local Community-Based Organizations and Culturally Responsive Organizations, and other entities in order to ensure each system has processes in place to issue referrals and share work with mutual clients. Grantees may set up contracts, subrecipient agreements or other methods of creating collaborative processes across organizational lines. OHCS recognizes that these partnerships may take different forms in each county.

Administrative Best Practices

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

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

Housing First

The Housing First Model encourages clients to create and implement their own goals while immediately housing or sheltering clients with no preconditions (except complying with a shelter code of conduct or standard lease agreement). Housing First best practices include, but are not limited to:

- Access to programs is not contingent on sobriety, minimum income requirements, lack of a criminal record, completion of treatment, participation in specific services or other unnecessary conditions.
- Programs or projects implement strategies to avoid rejecting (or make every effort to accept) an individual or family regardless of poor credit or financial history, poor or lack of rental history, minor criminal convictions, or behaviors that are interpreted as indicating a lack of "housing readiness".
- People with disabilities are offered clear opportunities to request reasonable accommodations within application and screening processes and during tenancy; and building and apartment units include special physical features that accommodate disabilities.
- Programs or projects that cannot serve someone can refer them through the coordinated entry process to ensure that those homeless individuals or families have access to housing and services

elsewhere.

- Housing and service goals and plans are highly tenant-driven.
- Supportive services emphasize engagement and problem-solving over therapeutic goals.
- Participation in services or compliance with service plans are not conditions of tenancy but are reviewed with tenants and regularly offered as a resource to tenants.
- Services are informed by a harm-reduction philosophy that recognizes that drug and alcohol use and addiction are a part of some tenants' lives. Tenants are engaged in nonjudgmental communication regarding drug and alcohol use and are offered education regarding how to avoid risky behaviors and engage in safer practices.
- Substance use in and of itself, without other lease violations, is not considered a reason for eviction.
- Tenants in supportive housing are given reasonable flexibility in paying their share of rent on time and offered special payment arrangements for Rent Arrears and/or assistance with financial management, including representative payee arrangements.
- Every effort is made to allow a tenant to transfer from one housing situation, program, or project to another if a tenancy is in jeopardy. Whenever possible, eviction back into homelessness is avoided.

More information can be found at:

- <https://endhomelessness.org/resource/housing-first>
- <https://www.usich.gov/solutions/housing/housing-first>

Lived Experience

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

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

- a) Bring the perspective of LE to the forefront by ensuring that no one is left out or misrepresented; ensuring that your organization's communications, fundraising, research, and programs do not reinforce the misconceptions that homelessness is caused by individual problems or can be solved by charity; using professional influence to help advance the goals identified by first voice people; and dedicating time and resources to advocacy and supporting grassroots social change efforts.
- b) Include people with LE at all levels of the organization by hiring those with LE in positions at all

levels within the organization; inviting those with LE to join the organization's board and committees; including LE as a dimension in an organization's equity and diversity policies; creating liaisons within municipal governments to include city councils and police boards; and working towards sustainability and advancement for peer positions so that those hired on as peer counselors or peer researchers can advance to permanent positions.

- c) Challenge stigma, confront oppression and promote dignity by providing training that addresses these issues to the whole organization; educate around the intersectionality of racism, sexism, classism, and ableism and how they work together and reinforce each other; and reviewing organizational policies and practices to ensure they promote equity, dignity and the rights of people facing homelessness.
- d) Work together toward equitable representation by including equitable representation in the organization's strategic planning process; setting concrete objectives and specific timeframes; working with other organizations that have successfully implemented equitable representation and evaluate progress, seeking input from people with LE in the process.
- e) Build authentic relationships between people with and without LE by cultivating an environment of caring, acceptance, and openness where differences are celebrated, and everyone's contribution is acknowledged; ensuring that all members of the organization are included in social activities and that those activities are accessible to all; and breaking down rigid roles such as "service provider" and "service user".

More information can be found at:

- <https://www.usich.gov/>
 - Search for "Lived Experience"

Prioritizing Equity and Racial Justice in Programming

- a) All grantees must prioritize equity and racial justice in their grant programs. This means that grantees must take proactive steps to ensure that their grant programs are designed and implemented for the communities in which they serve with racial justice at the forefront of their service delivery:
- b) Grantees must **proactively** ensure that their grant programs are accessible to all eligible individuals regardless of race, color, national origin, religion, sex, familial status, or disability.
- c) Grantees must take proactive steps to reach out to and engage with communities that have been historically underserved or marginalized.
- d) Grantees must ensure that their grant programs are designed and implemented in a way that promotes 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 subgrantees build their capacity to promote equity and racial justice.

- e) Grantees must comply with all applicable fair housing laws, federal and state laws prohibiting unlawful discrimination based on protected person status, and the equal protection clause of the 14th amendment to the US constitution. Please consult legal counsel for advice in program design and determining criteria for client eligibility.

More information can be found at the Key Performance Indicators section of this manual and at:

- <https://www.raceforward.org>
- <https://c4innovates.com/>

General Program Requirements

Staff Training

Grantees and subgrantee(s) staff that provide direct services and supervise staff who provide direct services and manage homeless grants must receive relevant training. Required training must occur for staff minimally, within one year from the beginning date of employment and current staff must receive training minimally once every two years from the date of the previous training taken. Grantees and subgrantee(s) must track who attended each training, the date of the training, and the synopsis of the training. Records for training must be made available to OHCS, upon request. Training is an eligible expense of program development and training topics must minimally include:

- Trauma informed services;
- Mental health first aid;
- Harm reduction;
- Supporting victims of Domestic Violence;
- Fair housing; and
- For those using OHCS funds for Street Outreach, training must include Outreach Safety Strategies.

Other trainings may be required by OHCS more often than every two years.

Privacy Notification

Grantees and subgrantees must have a written privacy notification document that meets the requirements of this section and provide it to applicant/client in written form, or they must have a standalone policy that describes how the grantee or subgrantee is providing this privacy notification to applicants/clients in compliance with state and federal legal requirements.

The privacy notification provided to applicants/clients must include 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, reporting, and monitoring. Personally identifiable information will be shared with Oregon Housing and Community Services and other state agencies *that* are administering programs that serve the same or similar clients or

populations, 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. *Personally identifiable information* will be disclosed to *Oregon Housing and Community Services* without written authorization.”

Grantees and subgrantees must also ask applicants/clients to sign a release of information form that includes a privacy notification. In addition to the information above, such form must include the following statement:

“Refusal to sign *this release of information form* cannot be the basis for denying program services to otherwise eligible applicants/clients. Applicant/client refusal to sign *this release of information form* will not prevent the inclusion of personally identifiable information in secure reporting to Oregon Housing and Community Services. Oregon Housing and Community Services will anonymize applicant/client demographic data for the purposes of reporting”.

Grantees and subgrantees must document to the applicant/client file that a privacy notification was provided to the applicant/client in a manner consistent with state and federal privacy laws. If grantees or subgrantees are collecting personally identifiable information for other purposes, grantees and subgrantees must follow state and federal laws for the collection, use, and sharing of applicant/client information as it pertains to those practices as well.

Grantees must ensure that subgrantees 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 to any privacy policy that, in its determination, does not meet basic principles or requirements of such a policy.

Confidentiality

Confidential records include all applications, records, files, and communications relating to applicants and clients of OHCS-funded services regardless of hard copy or electronic format.

Grantees must have a standalone policy for the maintenance of confidentiality of applicant/client records. Such policy must include:

- Identification of how all applicant/client records are secured and confidentially maintained.
- A statement that all applicant/client records must be maintained within state guidelines for the proper retention and destruction of records.
- A requirement that all grantee officers, employees, and agents are aware of and are in compliance with the grantees’ confidentiality policy and an acknowledgement of such policy, in writing.
- A provision for the electronic collection of applicant/client information which states that:
 - 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/client records.
 - Computer monitors must be cleared (or a screen saver activated) immediately after accessing a(n) applicant/client record.

- Computer terminals must be in a “locked” mode or turned off if the terminal is unattended.
- Access to personally identifiable HMIS data will be given to only authorized personnel when necessary for performing the work required for OHCS-funded programs.
- A statement that all records will be open for review to federal and state authorized representatives, auditors, and examiners during their regular audits and monitoring functions of OHCS-funded programs.

Grantees must ensure that subgrantees 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 to any policy that in its determination does not meet basic principles or requirements of such a policy.

Domestic Violence Shelter Confidentiality Provision

The address and location of shelters operating solely as domestic violence shelter facilities funded, partially or in whole, by OHCS must be protected from public disclosure except as authorized by the director of the organization responsible for operations of the shelter in compliance with federal, state, or local rules and regulations. OHCS retains the right to obtain shelter addresses and locations funded, partially or in whole by OHCS; however, such information is protected from public disclosure except as authorized by federal, state, or local rules and regulations.

Service Termination or Denial of Assistance

Grantees and subgrantees must have written termination, denial, and grievance policies and procedures. The policies and procedures should be readily available to Clients either at intake or by posting the policy in a public place. A public place should include grantee’s website if services are provided in a remote capacity. It is important to effectively communicate these policies and procedures to applicants/ Clients and to ensure they are fully understood.

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

Grievances and Appeals

Grantees are required to have an established, written stand-alone policy for addressing applicant/client grievances/appeal requests. Grantees must ensure that subgrantee(s) have policies that align with OHCS requirements and are consistent with the intent of such a policy as outlined by OHCS. Applicants/Clients must have the right and opportunity to grieve/appeal any decision that terminates, denies, limits, reduces or modifies benefits for any reason.

Applicants/Clients must be notified of their right for a grievance or appeal of such decision and Grantee policy must clarify how and when applicants/clients are notified of their right to grieve/appeal decisions. Such grievance/appeal policy must be posted in a public place, to include the grantee website; however,

applicants/clients must receive a verbal documented or written notification for any decision that terminates, denies, limits, reduces or modifies any benefit. Written notification via email is acceptable.

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

- Informs the client/applicant that they can contest any Grantee's or subgrantee's decision that terminates, denies, limits, reduces, or modifies any benefits and identifies the steps to follow to contest the decision;
- Informs the client/applicant of the reason for termination, denial, limitation, reduction, or modification of benefit;
- Allows any aggrieved person a minimum of thirty (30) days to request an administrative review/appeal of such decision;
- Informs the applicant/client 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;
- Identifies what reasonable accommodations are available for applicant/clients 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
- Informs the applicant/client and OHCS in writing of the final determination and basis for the decision within ten (10) days of the final determination.
- Any person or persons designated by Grantee and subgrantee(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.

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 includes the following:

A statement that grantee will comply with all state, federal, and 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; or victims of domestic violence, marital status, sexual orientation, gender identity, or source of income:

- 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
- A description of how applicants or clients can request reasonable accommodations to access

assistance or services, how that process is communicated to applicants and clients and how those requests are processed.

Grantees must ensure subgrantee(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 to 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. Affirmative outreach to a **target population** 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 have the greatest need and will receive services first; however, priority cannot be used as means of denying any person assistance. 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/clients 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/client 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.

OHCS reserves the right to require a prioritization of clients when such prioritization is intended from a specific funding source. Grantees and their subgrantee(s) must adhere to such prioritization required by OHCS.

For more information, contact Fair Housing Council of Oregon 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 subgrantees should address the needs of persons who have limited English proficiency (LEP). The abbreviated definition of persons with LEP 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 standalone policy that includes the following:

- The actions grantee took to identify LEP populations in their service area and citations for any source(s) used for evaluation;
- Defines actions grantee will take to provide language assistance and address language barriers;
- States how and how often staff will receive training about assisting LEP persons; and
- Identifies that, minimally, LEP populations will be evaluated biennially and that updates to the LEP policy will incorporate any needed changes to address new or emerging LEP populations.

Grantees must ensure that subgrantee(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 to any policy that in its determination does not meet basic principles or requirements of such a policy.

Grantees and subgrantees can create a written language access plan (LAP) to provide a framework to document how the grantee/subgrantee's programs will be accessible to all populations in their service area. Grantees and subgrantees 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 or subgrantee's obligation to ensure LEP persons have access to programs or activities.

Conflict of Interest

Grantees and subgrantees must ensure their performance of activities 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 subgrantee(s). A conflict of interest exists if, among other things, a decision or recommendation could affect the finances of the grantee's or subgrantee's officers, agents, or employees or the finances of their officers', agents', or employees' relatives. If a conflict of interest exists, the grantee's or subgrantee'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 subgrantee officer, agent, 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 applicant/client for the expediency of housing placement services or to create seamless service delivery while keeping the applicant/client engaged in services and such situation is documented in the applicant/client file.

Grantee must have a conflict-of-interest policy that outlines the process for disclosing, in writing, any potential or actual conflicts of interest. This includes procedures for staff when employees, board members, friends, or family members apply for program services. Grantees and subgrantees must comply with conflict-of-interest standards for both individuals and organizations. Grantees and subgrantees must keep records to show compliance with program conflict of interest requirements.

Organizational

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

Grantees and subgrantees can conduct a client intake assessment to determine program eligibility if the

client resides in housing where the grantee or subgrantee has ownership interest for the expediency of housing placement services and to create seamless service delivery while keeping the client engaged in services. A waiver of the conflict-of-interest policy for this purpose is not required.

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

Individual

For the procurement of goods and services, grantees and subgrantees must comply with the codes of conduct and conflict of interest requirements.

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

Grantee must have a conflict-of-interest standalone policy that complies with the following:

- States that grantee officers, agents, and employees will create no perceived, potential, or actual conflict of interest;
- Identifies how officers, agents, and employees are notified of policy;
- Outlines the process for disclosing, in writing, any potential or actual conflict of interest;
- Identifies the process the grantee will follow when notice of a perceived, potential, or actual conflict of interest is received and includes procedures for staff when employees, board members, friends, or family members apply for program services; and
- Identifies how records are kept of perceived, potential, or actual conflicts of interest.

Grantees must ensure that subgrantees 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 to any policy that in its determination does not meet basic principles or requirements of such a policy.

Program Eligibility

OHCS allows for local prioritization processes except for ensuring that applicants/clients who are most at risk need to be prioritized for services and supports. Prioritizing referrals from the educational system for the Households is a requirement of YEHA funding.

APPLICANT ELIGIBILITY	HOUSING STATUS	INCOME STATUS
<ul style="list-style-type: none"> • Reside in the state of Oregon AND • School aged youth K-12 that is unaccompanied, OR • Student school age K-12 and/or their family 	<ul style="list-style-type: none"> • Literally homeless • At imminent risk of homelessness • Fleeing domestic violence • Homeless under other federal statutes, including the McKinney Vento Definition of Homelessness • Unstably housed 	<ul style="list-style-type: none"> • No income requirements

Household (“HH”)

Household means an individual living alone, family with school aged children K-12, or a group of individuals who are living together as one economic unit. A group of individuals, as well as a family with school aged children, may include multi-generational or extended family households.

Housing Eligibility

One or more individuals within the Household can demonstrate a risk of experiencing homelessness or housing instability.

Housing Status

Households experiencing homelessness or at risk of homelessness are eligible to receive program funded services. Housing status may be obtained through a self-certification process alone without regard to further documentation of housing status. Eligible applicants for program services must meet one of the following categorical definitions of homeless or unstably housed and be at risk of homelessness.

Category 1: Literally Homeless

Household that lacks a fixed, regular, and adequate nighttime residence, meaning:

- Living in a primary nighttime residence that is a public or private place not designed for human habitation (including, but not exclusive to, a car, park, abandoned building, bus or train station, airport or camping ground);

- Living in a publicly or privately operated shelter designated to provide temporary living arrangements (including congregate shelters, transitional shelter, and hotels or motels paid for by charitable organizations or by federal, state, or local government programs);

OR

- Exiting an institution where he or she has resided for 90 days or less AND who resided in an emergency shelter or place not meant for human habitation immediately before entering that institution.

Category 2: Imminent Risk of Homelessness

Household or individual that will imminently lose their primary nighttime residence provided:

- 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 household lacks the resources or support networks (e.g., family, friends, faith-based or other social networks, etc.) needed to obtain other permanent housing.

Category 3: Homeless under a federal statute

Unaccompanied youth under 25 years of age, or families with youth who do not otherwise qualify as homeless under OHCS definition (YEHA funding can only be used for households that contain youth K-12), (literally homeless, imminent risk of homelessness, or fleeing/ attempting to flee Domestic Violence) but who:

- Are defined as homeless under a federal statute;
 - **Including the McKinney Vento definition of homelessness**
 - McKinney Vento definition of homelessness the term "homeless children and youths": means individuals who lack a fixed, regular, and adequate nighttime residence (within the meaning of 42 U.S.C. section 11434a); and includes:
 - (i) children and youths who are sharing the housing of other persons due to loss of housing, economic hardship, or a similar reason; are living in motels, hotels, trailer parks, or camping grounds due to the lack of alternative adequate accommodations; are living in emergency or transitional shelters; or are abandoned in hospitals;
 - (ii) children and youths who have a primary nighttime residence that is a public or private place not designed for or ordinarily used as a regular sleeping accommodation for human beings (within the meaning of 42 U.S.C. section 11302(a)(2)(C));

- (iii) children and youths who are living in cars, parks, public spaces, abandoned buildings, substandard housing, bus or train stations, or similar settings; and
- (iv) migratory children (as such term is defined in section 1309 of the Elementary and Secondary Education Act of 1965) who qualify as homeless for the purposes of this subtitle because the children are living in circumstances described in clauses (i) through (iii).
- 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 at least two moves 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

Household or individual who:

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

Category 5: Unstably housed

Household or individual 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 their current residence or otherwise demonstrate high risk* of losing current housing; AND
- They 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.

Citizenship and Immigration Status

Grantees must provide services to Households regardless of immigration status. Immigration status or citizenship may not be used as a reason for denial of services.

Prioritization Guidance

OHCS recognizes that prioritization of resources is a reality when there is more need than available resources. OHCS also notes that prioritization of who is served first should consider local factors and needs while also ensuring that Discrimination and fair housing laws are followed accordingly. The rest of the determination processes need to be documented by grantee/subgrantee to determine the most critical needs for each local community.

To that end, OHCS has the following criteria for prioritization under this program:

OHCS requires prioritization of McKinney Vento eligible student and/or family referrals from identified educational partners within the targeted geographic regions. Grantees will address student and family needs in the eligible expense categories outlined in the Allowable Expenses section below. Other priority populations may be identified by the grantee in a detailed scope of work and address the needs within grantee's community.

Grantee may be required to develop a written strategy for identifying and prioritizing households.

Oregon Residency

Services must be provided to those residing within the state of Oregon; however, there is no length of time prior to receiving services or financial assistance for which an applicant/client had to have been an Oregon resident.

If a Household's documented housing status is Category 4 – fleeing Domestic Violence, legal and Mediation services program funding can be used for eligible categorical costs associated with moving out of Oregon to a safe location, provided that there is documentation in the applicant's/client's service/housing plan, indicating that the applicant's/client's destination has been confirmed as an available, safe housing option and that no funds are used for rent, hotel/ motel, utilities, or other services in a state other than Oregon. Such allowable costs are restricted to moving costs.

Eligibility Documentation

Grantee policies and procedures must address the following elements:

- Verification of the identity of the applicant
- Verification and documentation of qualification for assistance in relation to program eligibility criteria, and
- Notification and documentation to client in relation to release of information
- Service denial or termination and grievance and appeal requirements.

Documentation of all client/applicant eligibility information must be available in client/applicant files or, if kept electronically, available upon request in the format requested. Documentation of all efforts to obtain a higher preference of verification (3rd party and Intake Worker Observation) when lower forms of

preference are used, must be in writing and kept in the client/applicant file.

Eligibility may be documented through Self Certification and/or within guidelines for Remote Application and Documentation.

Self-Certification may include but is not limited to:

- Income for the household if other sources of documentation are not immediately accessible
- Housing status at intake to the program
- Personal identification information

Please note that Housing Status does not need to be verified through further documentation other than self-certification, but a Community-Based Service Provider may wish to obtain more documentation if needed to establish eligibility.

In the absence of additional documentation case worker's case notes are sufficient evidence to report self-certification.

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

Remote Application and Documentation

OHCS' standard preference is for applicants/ Clients to apply for assistance in person or to have in-person contact with the grantee or subgrantee(s) throughout the application and service delivery process. A remote application and documentation process can be used when needed; however, the identity and residence of the applicant/client must be verified. Applicant/client file must reflect what method of identity verification was used.

To the extent permissible under grantee or subgrantee's privacy policy, Applicants/ Clients who apply for assistance and provide eligibility or other documentation remotely can do so via electronic and other communication (e.g., phone, email, text, electronic messaging, mail, or other electronic or remote means). Eligibility and other documentation must be kept in each applicant/client file to meet eligibility and monitoring requirements.

Grantees must have a standalone policy for the use of a remote application and eligibility documentation process. Grantees must ensure that subgrantee(s) have policies that align with OHCS requirements and are consistent with the intent of such a policy as outlined by OHCS. Such policy must be applied equitably across services that use or are supported by OHCS funding and when allowed by the funding source. OHCS retains the right to require modification to any policy that in its determination does not meet basic principles or requirements of such a policy.

The grantee's remote application and documentation policy must address the following elements:

- In what circumstances a remote application and documentation process will be used;
- How the verification of the identity and residence of the applicant/client is ascertained;
- How the verification and documentation of qualification for assistance in relation to program eligibility criteria are ascertained;
- When remote verification and documentation is appropriate for ongoing demonstration of eligibility; and
- How notifications are provided to applicant/Client, inclusive of privacy notification and grievance/appeal notification.

Order of Preference

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

1. Third-party documentation

Where it is available, is the preferable form of documentation. Third-party documentation includes verification from an employer, landlord, public benefit worker, agency service provider, etc. Written verification sent directly to program staff or via the applicant is preferred.

2. Intake Worker Observation

This may include oral statements made by a social worker, case manager, or other appropriate officials at an institution, shelter, or other facility and documented by the Intake Worker. When the Intake Worker is unable to obtain a written or oral statement from a shelter, institution, or facility staff, the Intake Worker must document, in writing, their efforts to obtain eligibility documentation and must place their documentation in the client's file.

3. Applicant Self-Certification

This requires a written and signed document by the individual or head of household seeking assistance attesting to the facts for which they are certifying. A third party may be designated by an applicant to sign documents on their behalf when they are unable to do so. It is the responsibility of the grantee and subrecipient to provide access to language interpretation services and assistive devices necessary for applicants to understand the documents they are certifying.

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Allowable Expenses

CATEGORIES

These terms are used throughout the document and defined below.

PROGRAM DELIVERY	
Outreach and Engagement Activities	Outreach and engagement activities associated with the community served by the grantee. These expenses can include outreach staff time, transportation, promotional materials, meetings, and events.
Street Outreach	Activities designed to meet immediate the needs of people experiencing homelessness in unsheltered locations, by connecting them with emergency shelter, housing, or critical/ urgent non-facility-based care. Can include but not limited to provisions for things like water, food, and hygiene items
Translation Services	Development of a language access plan and translation of web and print materials into languages most utilized in the service community. Expenses tied to enabling access to services for users with limited English proficiency.
Web, Print, Social Media, and Advertising	Promotions and advertising for the grant program and other available housing-related services provided by the grantee. Web media, print media, social media advertising, and promotional expenses.
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 with the most vulnerable and underserved Oregonians in mind. 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.
Program Evaluation	Regular evaluation of program efficacy, outcomes, generating reports, charts, and visualizations. May include materials and expenses tied to these efforts.
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.
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.
Personnel – Staff Time	Staff wages, salaries, and employment benefits for staff who deliver services and those who directly oversee program operations.

Non-Personnel Operations	Operation of the program and overhead expenses, such as rent, utilities, office supplies, equipment, and vehicle leasing or purchasing (for the agency, not the client, and requires OHCS pre-approval). Funding of operations for family and youth shelters are allowed; however, shelters that do not allow for the family unit to shelter intact (and are separated) is unallowable.
Block (Master) Leasing	Block leasing is a type of lease that gives the lessee the right to control and sublease the property during the lease, while the owner retains the legal title. For example, a housing authority or service provider would be the lessee, allowing them to sublease the property to its tenants. An example of an eligible expense would be those related to a property manager on site as part of the block leasing agreement
Case Management Services	Direct services and referrals tied to activities associated with individualizing and integrating employment, health care, connections to benefits, and other housing-related options for or with an individual or household. Case managers assist clients in assessing and coordinating any services necessary to address their housing instability. It is a collaborative process that involves planning, implementing, monitoring, and evaluating the options and services for each client.
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. A specialist who assists people in locating and securing affordable housing is called a housing navigator.

DIRECT CLIENT EXPENSES	
Rent and Utilities Payments; Arrearages	Past due rent and utilities payments, without a maximum number of allowable months. This includes rental and utility arrears in collection if it is a barrier to stable housing.
Motel/Hotel Stays	Payment of hotel or motel stays for interim housing (short duration)
Future Rent and Utility Assistance	Future rent and utility payments, without a maximum number of allowable months. Grantee must have policy related to serving program participants and community equitably.
Security Deposits	Security deposit payment in current unit or unit household is moving into to attain housing stability.
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.
Application Fees	Rental application fees for new housing unit.

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.
Pet Rent and Pet Deposit	Pet rent payments and payments of security deposits for pets in housing units. Per statute, landlords are not able to charge pet rent or deposit for service animals. Please see “Pet Deposit” below chart for more information.
Direct Cash Transfers	Cannot exceed more than 50% of the total grant funds awarded. Grantee must develop detailed policies around the use of direct cash transfers and defined outcomes associated with the intended use.
Housing-Related Fees	Rent/utility late fees, housing-related court fees, and utility reconnection fees.
Work and Educational Supports	Expenses including training costs, transportation assistance, childcare and eldercare needs, and clothing to support employment or educational needs.
Furniture and Household Goods	Up to a maximum of \$2000 per household for basic furniture and household goods to make the unit habitable for the household needs. These expenses can include bed, bed frame, seating, dining table, needed lighting, kitchen supplies, food supplies, bathroom supplies, personal protective equipment, etc.
Transportation	Costs, such as bus/train passes, gas vouchers, Uber/Lift/Cab fares, traffic fines, car repairs/insurance are allowable and travel related expenses to support participant appointments for employment, educational needs, benefits, educational or medical needs, or any other related activity tied to their housing stability plan. Vehicle leasing or purchasing (for the grantee, not the client, and requires OHCS pre-approval), is also allowed.

ADMINISTRATIVE COSTS (15% maximum of full award)	
Admin Expenses	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.

Case Management Services

Case management services include:

- Intake and assessment, including time spent assessing a household and determining whether or not the household was eligible;

- Once an eligibility determination is made, case management services also work to connect applicants/clients to resources within the organization, or external to the organization if needed for stability supports;
- Direct client services include developing an individualized housing and service plan, monitoring and evaluating household progress, identifying creative and immediate housing solutions outside of the traditional homeless service system (diversion), and ensuring that households' rights are protected;
- Services that increase access to the income supports. This includes increasing access to earned income, or access to disability benefits programs administered by the Social Security Administration for eligible adults who are experiencing or at risk of homelessness and have a serious mental illness, medical impairment, or a co-occurring substance use disorder (i.e., SOAR or similar style services);
- Services for clients entering or in permanent supportive housing who need assistance to stabilize;
- Placement services includes services or activities designed to assist households in locating, obtaining, and retaining suitable housing, Tenant counseling, assisting households to understand Leases, inspections, securing utilities, making moving arrangements, and representative payee services concerning rent and utilities;
- Mediation and outreach to property owners/ Landlords related to locating or retaining housing; and
- Data entry.

Client Service or Housing Plan

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

Direct Client Expenses

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. Stabilization costs expended before the participant household is residing in housing must be essential services necessary for securing and sustaining housing placement; non-essential services, or those not necessary for housing placement, are not permitted for individuals and households not pursuing housing placement. Costs and rationale for expenses must be documented thoroughly in client files. Eligible expenses include:

- Provide authentic case management and peer support services that are tailored to meet the individual needs of each youth or household.
- Case managers will meet as needed with household and landlords to address any difficulties. A release will be needed by the tenant to give landlords permission to speak with Case managers regarding these and other issues.
- Case managers will act as a liaison and advocate to solve landlord issues or concerns.
- Housing Identification helps Household identify best-fit housing opportunities and secure housing.

- Housing must be near services such as school/employment, social supports, and public transportation where reasonable.
- Work supports (i.e., training costs; transportation assistance – bus tokens, ridesharing; clothing to support employment needs) The purpose of the work supports is to allow the household to stabilize by avoiding costs or expenses in other areas that are a barrier to housing stability.
- Provide assistance applying for EBT and other such DHS programs
- Help household members access to physical healthcare, access to mental healthcare, access to a dental clinic (as needed), access to a vision clinic (as needed), and assistance applying for health insurance
- Help household members obtain identification and vital documentation, such as birth certificates, social security cards, I-9 documents, etc.
- Provide a good renter course
- Assist with job attainment and retention skills, financial literacy course,
- GED/HSD attainment, and transit passes
- Provide opportunities for basic household skills courses, and volunteer opportunities that support job skills
- As applicable, provide Veteran’s resources, culturally specific organization encounters, and LGBTQ+ resources
- College access, trade school access
- Assistance in applying for unemployment, rental assistance, or other benefits that help stabilize the household
- Employment services and job training to obtain or maintain access to housing
- Financial literacy and credit recovery assistance as needed to obtain housing or stabilize housing including associated fees, credit reports, informational courses, rental, eviction, and utility debt correction tied to housing stability
- Mental health counseling and associated medical services and substance use treatment, including but not limited to access to a mental health practitioner for medication management for persons with disabilities, as required to obtain or maintain housing
- Technology purchases for the clients is ONLY allowable if the technology is a needed supply for the program participant to attend a housing stability services training program, search for employment, to apply for benefits, to maintain personal safety, to communicate with case manager, or to communicate with a remote medical or mental health provider and the expense is directly necessary to obtain or maintain housing, then broadband assistance or purchase of a computer/cell phone/cell phone minutes or data hotspot is allowed. Otherwise, technology costs are not allowed. Within the allowable activity noted, no individual purchase of equipment of more than \$500 is allowed. Aggregate equipment purchases for a single household cannot exceed \$1,250. Case manager case notes are sufficient to support qualification for technology allowances.
- May provide food, basic clothing needed for protection from the elements, or to obtain employment or basic hygiene products (including household cleaning products), as part of a service to help the individual obtain or maintain housing.
- Case management services related to housing stability, including but not limited to help accessing other benefits (e.g., SNAP, SSI, SSDI, Veteran’s assistance, and Medicaid). A caseworker’s salary is an eligible service if the casework provided is for eligible activities.

Direct Cash Transfers

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. Grantee can allow for direct assistance if it can address the housing stability of the participant, is an allowable expense under the program guidelines, and the grantee has developed an approved OHCS policy for Direct Cash Transfer (“DCT”).

Types of DCTs:

- Cash directly to landlords via the program participant
- Vouchers to vendors for expenses directly in line with program intent, or
- Cash directly to applicants for HH needs that cannot go directly to a vendor, and support the case management and HH goals for the program
- Gift cards

DCTs are a process by which cash will be distributed to individuals, tenants, vendors, or landlords for the purpose of meeting agency objectives. The following criteria must exist when determining if it is appropriate to provide DCTs:

- Grantee must require client-facing policy that identifies allowable purchases and use of gift card.
- Client must receive documentation that identifies the purpose and intent of the DCT and must acknowledge, by written, legible, wet signature, or at minimum a signature by verbal attestation, and one copy should be provided to client and one copy should be kept in clients’ file.
- Clear constraints on what the DCT may be used for.
- The entity receiving the DCT must develop internal controls over which the program can be monitored to assure DCT’s are used for their intended purposes.
- 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.
- If using gift cards, the gift cards must be purchased and issued to clients within the grant period. For any gift cards that are not issued to clients before the close of the grant period in which they were purchased, grantees must submit a negative request for funds for the grant period 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 DCT and recipients. Gift cards must be kept in a secure location prior to being issued.
- Grantees and subgrantees must make reasonable efforts to obtain the cooperation of landlords and utility providers to accept payments directly from the program.

Furthermore, DCT’s cannot augment other programs for which funding is provided, *nor can they exceed more than 50% of the total grant funds awarded.*

Internal Controls

Agreements must contain clear constraints on what the DCT payments may be used for, and an application process must be established to determine eligibility, and to ensure public funds will be used for their intended purposes, consistent with ORS 456.625(17)(d).

Internal controls may consist of but are not limited to:

- Receipt from landlords for rental payments
- Receipt from vendors for ancillary items
- Attestation from applicants for use of funds
- Receipts from applicants for use of funds

Other Considerations

Although OHCS does not provide tax guidance, DCTs may require issuance of 1099's. Receiving entity must perform due diligence in determining application.

Transportation / Travel

Costs, such as bus or train passes, gas vouchers, Uber/ Lyft/ cab fares, car repairs, traffic fines, and auto insurance are allowable. Payments that allow Clients to use public transportation are the highest priority and must be considered first for the purpose of attending required appointments, job searches, or other critical services. Case managers have the discretion to provide funding for repairs, gas, and auto insurance for a client's personal vehicle. Case managers must document why a client's personal vehicle option is preferred over public transportation options and that the expense will lead to the stabilization of housing. Costs associated with a vehicle not owned by the client are not allowed. Client must have a valid driver's license.

OHCS funds may be used to purchase a vehicle for the grantee to transport clients as needed to achieve and maintain housing stability. All purchases require pre-approval by OHCS. Grantees must detail their plan, intended use, and expenses for approval. OHCS funds cannot be used to purchase a vehicle for the clients to drive.

Private transportation options can include minor vehicle repair, car insurance, and the least costly option for vehicle registration, with written grantee or subgrantee policy on use of funds for these services and such policy must be available to OHCS upon request. Grantees must ensure that subgrantee(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. For example, repair to a vehicle might be preferable to a bus pass if the community does not have public transportation or if the client works at night when public transportation is not operational.

Transportation does not include insurance to pay for roadside assistance (such as a membership to AAA), traffic violations, or any collection costs associated with these fines. Insurance includes only general

liability insurance as required by the State of Oregon; however, comprehensive/ collision coverage, can be allowed, but only when there is documented evidence that such coverage is a requirement of a vehicle loan. Insurance is paid before the period of service and vehicle owners have 10 days in which to make payment; therefore, insurance arrears costs are unallowable.

Equipment/Vehicle Purchases

- a) All purchases of equipment (fixed assets) or vehicles purchased with OHCS program funds, and which have a unit cost of \$5,000 or greater require OHCS written approval.
- b) Depending on the purchase type, local agencies must submit a completed OHCS Equipment Purchase Request Form at:

- <https://app.smartsheet.com/b/form/c1dee2581c4d4f63b8406ed2ecce0195>

Or a OHCS Vehicle Purchase Request Form at:

- <https://app.smartsheet.com/b/form/5e9a5365017149c4a7640177bc8f2c37>

- c) The grantee's procurement system should include at the least the following:
 - A code or standard of conduct that shall govern the performance of its officers, employees, or agents engaged in the awarding of grants using federal funds.
 - Procedures that ensure all procurement transactions shall be conducted in a manner to provide, to the maximum extent practical, an open and free competition.
- d) The grantee must have minimum procedural requirements that include the following:
 - Procedures to assure the avoidance of purchasing unnecessary or duplicative items.
 - Solicitations are based upon a clear and accurate description of the technical requirements of the procured items.
 - Positive efforts are made to use small and minority-owned businesses.
 - Procedures that include the performance of a price or cost analysis in connection with every procurement action.
- e) Equipment and vehicles should be acquired with grant funds from OHCS only after all other options have been explored.
- f) If equipment is shared with other local agency programs, a rental fee is required and may be implemented based on a proportionate use of the equipment.

Title to vehicle and equipment purchased in whole or in part with OHCS fund must rest with the grantee who has an executed contract with OHCS. OHCS cannot be named as title holder.

Requests for equipment/vehicles purchased with YEHA funding require prior written OHCS approval. Allow **90 days** for OHCS review.

- Trade-in of previously acquired equipment of \$5,000 or more is allowed with OHCS approval.
- OHCS does not need to approve a vehicle lease that does not include a “purchase option.” If a lease-purchase option is proposed, regardless of the purchase price, OHCS must approve the purchase of the vehicle.
- Whenever equipment/vehicle purchased with YEHA funding is shared with a non-Federal outside organization, a fee must be charged for no less than private sector rates.

Insurance Requirements

Grantees are responsible for ensuring OHCS’s financial vested interest in motor vehicles, equipment, and fixtures with purchase values of \$5,000 or more and purchased under OHCS contracts. This shall include insurance coverage in the amount of \$1,000,000 minimum liability per occurrence.

Disposal Requirements

Any original purchase over \$5,000 must receive OHCS approval prior to grantee’s ability to dispose of the purchased item. Grantees are responsible for compliance with 2 CFR 200.313 and must submit a completed OHCS Equipment/Vehicle Disposition Request Form. Forms may be requested by emailing the Contract Administrator.

Duplication of Benefits

OHCS funds shall not be issued if it duplicates a benefit already paid through another source. If a duplicate payment is made, grantee has thirty (30) days in which to return the duplicative payment. Grantees and subgrantees must check to ensure that benefits issued do not duplicate other benefits for the same payment and service using HMIS and any other data system for which the grantees or subgrantees have access. Grantees/subgrantees must have a standalone policy that identifies:

- How they will ensure benefits are not duplicated; and
- What system(s) they use to check for duplicated benefits.

Grantees must ensure that subgrantees 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 to any policy that in its determination does not meet basic principles or requirements of such a policy.

Affirmative Marketing and Outreach Requirements

Grantees are required to have a policy in place that ensures good faith efforts to affirmatively further Fair Housing through marketing and outreach strategies that focus on protected class groups to ensure equal

access. Technical Assistance is available for grantees to develop such a policy upon request to OHCS. The Policy must specifically address the following:

- A method for determination of who lacks access to opportunity with regards to housing and services for the eligible population
- Specific focus on Native Americans and Alaskan Natives, Black, Indigenous, and other People of Color, as well as LGBTQI-GNC youth for outreach and marketing of the program
- Address racial disparities in planning documents and scope of work.
- Provide culturally responsive services, including but not limited to language translation and interpretation services.

Prevention Activities

Funds may be used for eviction prevention activities that support the system's change by increasing and strengthening partnerships. Partners will provide housing stabilization services administered by community-based social service providers and culturally specific, youth-specific providers that include, but are not limited to:

- Wrap-around case management (including retention support after initial intervention)
- Housing counseling
- Landlord outreach and negotiation (i.e., mediation services)
- Provisions of landlord incentive payments to improve the likelihood of finding housing through negotiating with landlords and expanding the housing pool for households facing barriers to housing (e.g., households with criminal backgrounds, poor credit, debt, or poor rental history).

Eligible landlord incentive costs may include:

- Signing bonuses equal to up to 2 months of rent
- Security deposits equal to up to 3 months of rent
- Paying the cost to repair damages incurred by the program participant not covered by the security deposit or that are incurred while the program participant is still residing in the unit and participating in the YEHA program with a limit of \$5,000

Diversions Activities

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

- Court navigation staffing costs;
- Legal expenses related to eviction or housing needs (legal advice, representation, and other services);
- Landlord/Tenant Mediation services;
- Program staff;
- Transportation to court through ride-shares or services like Uber, Lyft, Bus Tickets, etc. and;

- Paying for costs related to helping clients access another housing resource (EHV vouchers, HCV, etc.).

Outreach and Engagement

Street Outreach

Funds can pay for street outreach services for the specific purpose of reaching out to households experiencing homelessness; connecting them with emergency shelter, housing, or critical services; and providing urgent, non- facility-based care. OHCS encourages the use of multi-disciplinary approaches and partnerships with culturally specific, healthcare-focused, or other specialty outreach services. Leveraging various fund sources to pay for health services, such as through Medicaid, should be explored whenever possible. Any health professionals providing specialty outreach services are expected to have proper credentialing and licensure through relevant governing bodies (e.g., Oregon Health Authority, Mental Health & Addiction Certification Board of Oregon. Eligible outreach services include but are not limited to:

- Conducting an initial assessment of applicant basic needs and eligibility;
- Providing crisis counseling;
- Addressing urgent physical needs, such as providing meals, blankets, clothes, or toiletries;
- Actively assessing, connecting, and providing information and referrals to needed services, including emergency health and mental health services;
- Cost of outreach including, but not limited to, marketing and outreach materials, translation and interpretation services and cell phone costs of outreach workers, etc.;
- Emergency health services to the extent that other appropriate services and treatment are unavailable or inaccessible within the community;
- Emergency behavioral health services to the extent that other appropriate services and treatment are unavailable or inaccessible within the community; and
- Travel expenses incurred by outreach workers, social workers, medical professionals, or other service agency employees during the provision of allowable street outreach services.

Funds may be used for outreach and engagement activities. Eligible expenses include:

- Facilitate and host community awareness campaigns among tenants and landlords aimed at increasing knowledge of resources, protections, and how to get access to these benefits, or both.
- Provide help to tenants in applying for rent assistance by explaining eligibility requirements, scanning documents, or providing other technical support, and providing in-language support.

- Funding of housing navigators
- Travel (i.e., mileage reimbursement for outreach activities)
- Planning and convening costs for rental assistance systems

Safety In Street Outreach

Safety in service delivery – each grantee and subgrantee must have a written policy regarding staff safety in service delivery (such policy must be made available to OHCS upon request). Grantees must ensure that subgrantees 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 to any policy that in its determination does not meet basic principles or requirements of such a policy. Policies must include the following:

- Never go out alone. Teams of two should be considered the absolute minimum.
- Establish a system in which threats to safety of teammates are identified unbeknownst to others while conducting street outreach.
- The office or clinic (e.g., team members not in the field) should always know the location of outreach teams. Keep to a set schedule and use smartphones that have built-in GPS functionality.
- Wear matching clothing, ideally in bright colors, so the street outreach team is easily identified.
- Linkages with crisis response teams and behavioral health support are essential, especially if outreach teams lack a behavioral health provider.
- Use trauma-informed de-escalation training for outreach staff.
- Use harm reduction principles: safety and comfort are two different things, as are perceived threats to safety and actual threats. Witnessing drug use is not necessarily a threat to safety, for example.
- Create time and space for street outreach teams to debrief and process any threatening events. Trauma-informed supervision of outreach personnel is essential.

Key Performance Indicators

Each grantee will collaborate with regional service and educational providers to identify goals based on populations being served, eligible expenses categories and investments proposed as part of their scope of work. Goals must be clearly quantified to include number of households, beds, and/or people served. A timeline of quarterly milestones will be included to mark progress to achieve the goals and outcomes identified by the grantee.

Individual grantee agreements outline the number of individuals or households to be served in the performance period with allocated funding. For the designated number of households served, the following is the key performance measure for success in our homeless/eviction prevention programming: Grantees must, and must cause and require their subgrantee(s), to administer the program in a manner consistent with the OHCS program requirements designed to achieve the following performance goal:

80% of total households served will reside in permanent housing upon exit from the program or project funded by the program.

This key performance measure uses HMIS as the primary data source.

Data Entry

HMIS

Grantees and their subgrantee(s) are required to enter YEHA program related client data into the 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. Grantees and subgrantees are responsible for acquiring and documenting informed written consent from Clients and protecting Client's confidentiality.

OHCS reserves the right to request other key datasets including the following:

- Detailed budget and spending reports, especially the breakout of costs spent on clients (financial assistance) and costs spent on program delivery (staffing, subcontracts, and related costs).
- Number of clients served to date, including demographics and other trends as indicated in the HMIS system.
- Number of requests for assistance to date.

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

Data Timeliness

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

Data and Reporting Requirements

All Providers are required to use the Homeless Management Information System (HMIS) or an HMIS-comparable system. Services rendered under YEHA must track demographic data as required in Data Elements. Clients may decline to provide demographic information and still receive assistance.

Grantees must enter and report referrals, required enrollment data, service transactions and funding sources in HMIS.

For any reporting questions, please contact hssreporting@hcs.oregon.gov.

Grantee will assist with qualitative and quantitative data collection throughout the program.

Reporting

Required HMIS data collection:

HUD Universal Data Elements, Program Elements, and OHCS-required Data Elements must be collected for the YEHA program.

- 3.01 Name and Name Data Quality
- 3.02 Social Security Number and SSN Data Quality
- 3.03 Date of Birth and DOB Data Quality
- 3.04 Race & Ethnicity
- 3.06 Gender
- 3.07 Veteran Status
- 3.08 Disabling Condition Y/N and 4.05 - 4.10 Specific Disabling Conditions
- 3.10 Project Start Date
- 3.11 Project Exit Date
- 3.12 Destination
- 3.15 Relationship to Head of Household
- 3.16 Enrollment CoC
- 3.20 Housing Move-in Date
- 3.917 Prior Living Situation
- 4.02 Income and Sources
- 4.03 Non-Cash Benefits
- 4.11 Domestic Violence
- 4.12 Current Living Situation
- Current County of Residence (for CAAs that cover more than one county)
- Percent of AMI
- Financial Service Transactions

Annual Reports

Program Delivery Annual Report – A narrative annual report must be submitted, in form and format required by OHCS, by the 60th day following the end of the fiscal year (August 30th) providing details including, but not limited to, subgrantee(s) budgets, program services, performance, outcomes, successes, and challenges.

Narratives will be required by each grantee to include:

- Challenges faced in administering the program
- Successes in the program
- Gaps you are seeing within the program/what are you seeing as the most pressing needs for this

population in your communities?

- Uses, challenges, successes of utilizing Direct Client Transfers

Service Transactions

Grantees and Subgrantees are required to track service transactions that are aligned with the services OHCS uses, via HMIS. Service transactions include but are not limited to: Financial Transactions, Housing Navigation, Case Management, Income and Employment Support, and Transportation.

Types of Services that will be expected to be entered into HMIS: The examples under each service category below may not be an exhaustive list:

1. Supplies
 - Clothing, Food
 - Vital records
 - Household goods
 - Move-in kits
2. Case management:
 - Life Skills
 - Mental Health Services
 - Victim Advocacy
 - Housing Support/Stabilization
 - Making referrals
 - Housing Navigation
 - Landlord Mediation and Advocacy
 - Crisis Intervention
3. Supportive Employment
4. Day drop-in
5. Direct Cash Transfers (DCT)
 - Gift Cards
6. Host homes
7. Rent assistance-Eviction prevention and/or placement
8. Move In fees
 - Deposits
9. Application fees
10. Utility assistance
11. Legal fees
12. Transitional Housing Operations
13. Hotel/motel voucher
 - Shelter
14. Outreach
 - Street Outreach
 - Professional Outreach- advertising programs
15. Peer support, Mentoring

16. Childcare
17. Transportation
18. School expenses
 - Fees
 - Supplies
 - Tutoring

Comparable Database

“Victim service providers” are prohibited from entering data in HMIS; however, they must maintain comparable databases that provide aggregate information and data consistent with HMIS data collection requirements.

Comparable Databases must have the following characteristics:

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

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

Monitoring

OHCS may conduct a program monitoring of grantees at least once during a biennium or more frequently at OHCS’s discretion. Fiscal monitoring will be conducted annually unless circumstances require sooner.

Grantees will be notified thirty (30) days in advance of the monitoring visit and informed of what documents and records will be reviewed and any required staff or Board interviews. OHCS will provide grantees with a written monitoring report inclusive of any findings, concerns, or comments. Grantees are required to submit timely corrective action to findings, and failure to do so may result in the withholding and/or return of funds to OHCS.

Grantees must notify and receive approval from OHCS when adding subgrantees and/or renewing subgrantees.

Subgrantee Monitoring

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

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

Adherence to Program Guidance

Service providers, partners, and case managers must adhere to Program Guidance and changes from Agency.

Records Requirements

Case Files

Documentation of client eligibility and services received must be maintained in client case files (paper or electronically). Documentation for applicants found to be ineligible for assistance or for clients who are no longer eligible to receive assistance is required and will include the client's request for assistance, why they are ineligible, and how it was communicated to the applicant. Ineligible clients do not need to be entered into HMIS unless the use of HMIS is a part of the grantee or subgrantee's intake/assessment process.

File documentation will be the basis of OHCS monitoring to ensure the grantee and subgrantee(s) are in compliance with program requirements and regulations. OHCS recommends that grantees and subgrantees use a client file checklist to ensure adequate documentation of case files. OHCS Forms and Tools can be found at: <https://www.oregon.gov/ohcs/Pages/housing-assistance-program-forms.aspx>

Records Access

Grantees and their subgrantee organizations are required to permit OHCS, the Oregon Secretary of State's Office, the federal government, and the duly authorized representatives of such entities access to, and the right to copy, all program client and fiscal records for such purposes as research, data collection,

evaluations, monitoring, and auditing. At the sole discretion of OHCS, access to records shall include the removal of records from the grantees and subgrantees' offices.

Records Retention

Grantees and subgrantees shall retain all program records pertinent to client services and expenditures incurred under YEHA in a manner consistent with requirements under state and federal law. This includes, but is not limited to, those requirements listed in Administrative Rule, Program Guidance, and Special Schedules.

Find the OHCS Special Schedule at the Oregon State Archives:

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

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

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

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

Financial Management

Mandatory use of OPUS

The OPUS database is the system of record for financial transactions with OHCS and use of OPUS is mandatory for fund allocation, draw down, and fiscal reporting processes.

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

Grantee shall, and shall cause and shall require its subgrantee(s) by contract to comply with the following program specific reporting requirements:

Ensure that data collection and reporting for Housing Retention funded activities be conducted through the use of the OHCS approved OPUS database or other OHCS designated service data information system and assure that data entry into OPUS occurs in an accurate and timely manner.

This program uses the following categories within OPUS:

- Administration
- Program Delivery
- Program Development
- Outreach and Advertising
- Client-facing expenses

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

Email: opushelp@oregon.gov

Ph: (503) 986-2099

Toll Free: (800) 453-5511, Option 6

Request for Funding Documentation

Grantees must retain supporting documentation of all costs charged to the applicable grant and be able to provide evidence that grant funds were spent on allowable costs. When grantees submit an invoice for repayment, they must submit documentation of the costs for which they request payment, which must be tracked in HMIS. Any invoice submitted without accompanying documentation or with insufficient documentation will be returned to the grantee with instructions to provide additional information.

Budget Change Requests and Project Amendments

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

At the discretion of OHCS, additional information or a Project Amendment Request form may be required for a budget change request. Project Amendments are required when there is a shift in program delivery and/or scope of work. All Project Amendments require OHCS written approval by submitting a request through the appropriate Smartsheet form.

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

OHCS Spend Down and Reallocation Policy

The following procedures are established for all funds allocated to Grantees through the Grant Agreement process.

Spending Targets

All funds, with the exception of administrative allocations, must be spent proportional to the Expenditure

Period at the rate prescribed below (as tracked through the OPUS “Award Summary” report).

Each grantee is expected to spend at least 50% of Grant Funds by June 30, 2025.

OHCS and Grantee Collaboration

When spending is below the thresholds described above, and prior to funding rescission, OHCS and Grantee agree to find solutions that resolve the issues, provided it is within OHCS’ control (in its sole discretion) to adjust to meet grantee’s needs and does not conflict with federal or state law. Solutions for resolution may include, but not are limited to:

1. OHCS program staff will discuss best practices and training and technical assistance resources to aid in resource utilization. This could include special and discretionary funding allocations to assist with capacity or training needs.
2. OHCS staff may contact Grantee to brainstorm and potentially facilitate connections with service providers or provide a list of service organizations and recommended contacts to utilize funding.

OHCS will provide written notice to cure to grantee and OHCS will allow proposals from Grantee to cure spending issues and prevent funding rescission. Grantee will have 15 calendar days to send the Program Analyst a time-bound expenditure plan for approval to demonstrate how compliance with spending targets will be achieved.

Committed Funds

For grants that include the category of program delivery, Grantees can include these funds as part of the commitments in OPUS; however, the Spend Down Policy and remedies apply only to expended funds as identified in the OPUS “Award Summary” report.

Administration

Grantees are allowed to use up to fifteen percent (15%) of their total program allocation for administrative costs, including those allowed for subgrantee(s) organizations with whom the grantee contracts. There is an expectation that administrative funds will be shared with subgrantee(s) commensurate to the services provided through the program by subgrantee(s).

Please note that indirect costs are allowed to be applied to the Administration category. Allowable administrative costs typically, but not exclusively, benefit the organization as a whole and cannot be attributed specifically to a particular program. All amounts billed must be supported by actual costs.

Allowable costs include, but are not limited to:

- Senior executive management personnel salaries and benefits (unless they are directly involved

in program operations), administrative staff travel costs.

- General services such as accounting, budget development, personnel, contracting, marketing, agency audit, agency insurance.
- Board expenses (excluding meals);
- Organization-wide membership fees and dues specific to homeless systems and programs.
- General agency facilities costs (including those associated with executive positions), such as rent, depreciation expenses, and operation and maintenance (as part of the organization's direct or indirect cost allocation plan);
- Equipment rental/purchase, insurance, utilities, and IT costs that are not program specific but relate to the administration of the agency as a whole.

Applicable Rules and Regulations

All the following as can be amended from time to time:

- **ORS** 456.515 through 456.725 (OHCS)
 - https://www.oregonlegislature.gov/bills_laws
- **OAR** 813-005 (General):
 - <https://secure.sos.state.or.us/oard/ruleSearch.action>
- **Limited English Proficiency** federal interagency website can be found at:
 - <http://www.lep.gov/>
 - Guidance and additional materials can be found at
 - https://www.hud.gov/program_offices/fair_housing_equal_opp/limited_english_proficiency_0

This manual, as guidelines for our YEHA program, are amended from time to time along with all other references made within this Program Guidance. All references made in this Program Guidance are understood to be as written, and as amended from time to time.

- **ORS** cited are amended from time to time and can be found at:
 - https://www.oregonlegislature.gov/bills_laws/Pages/ORS.aspx

Procurement

Purchases of equipment or property are subject to additional provisions and requirements as stated in the Grant Agreement. Fixed assets with a value greater than \$5,000 include computer equipment, electronic equipment, photography equipment, hand tools, and other items. Title to all equipment purchased in whole or part with OHCS funds must be in the name and possession of the Grantee.

Disposal of any item having an original cost of more than \$5,000, and which is currently valued above \$5,000, requires prior OHCS written consent. Property and equipment purchased with OHCS grants shall not be used for collateral or to secure financing.

Purchasing contracted services should only occur when the skills, knowledge, and resources are not available within the grantee's organization or is unable to complete the work within required time

limitations. A contractor must be registered to do business in Oregon and have the necessary credentials of expertise. The grantee is expected to obtain multiple bids or pricing. If using a sole source contract, the grantee must have written documentation to explain why they were not able to obtain more options.

Definitions (not defined elsewhere)

Client: A household who has received an assessment of need, has been entered into an OHCS-funded program (intake), entered in HMIS and who is receiving financial assistance. A client is someone who has developed a client services/housing plan and is not receiving one-time only assistance.

Eviction: The court-ordered removal of a tenant from the property where they reside. A landlord may decide to evict a tenant for nonpayment of rent, damages, illegal activity, violating the terms of a lease, or if the landlord wishes to take possession of the property.

Eviction Prevention: Strategies and programs designed to keep individuals and households in their homes, helping them to avoid the risk of homelessness. Eviction prevention is often seen as an “upstream” solution to keep individuals and households stably housed, to avoid them falling into unsafe housing conditions, and to avert the damaging impacts on mental and physical health, economic wellbeing, and access to future housing options that often come with evictions on record. These strategies intervene and provide support at different points in the eviction process – before an eviction is filed with the courts, during an eviction proceeding, and after an eviction judgment is given. The goal is to address the roots causes of evictions with interventions at different stages in the eviction process, tailored to meet a range of needs and circumstances.

HMIS: Homeless Management Information System – A Federal and Local information technology system used to collect client level data and data on the provisions of housing and services to individuals and families at risk of and experiencing homelessness.

Housing First is an approach to connect individuals and families experiencing homelessness quickly and successfully to permanent housing without preconditions and barriers to entry, such as sobriety, treatment, or service participation requirements.

McKinney Vento (MKV) definition of homelessness the term "homeless children and youths": means individuals who lack a fixed, regular, and adequate nighttime residence (within the meaning of 42 U.S.C. section 11434a; and includes:

- (i) children and youths who are sharing the housing of other persons due to loss of housing, economic hardship, or a similar reason; are living in motels, hotels, trailer parks, or camping grounds due to the lack of alternative adequate accommodations; are living in emergency or transitional shelters; or are abandoned in hospitals;
- (ii) children and youths who have a primary nighttime residence that is a public or private place not designed for or ordinarily used as a regular sleeping accommodation for human beings (within the meaning of 42 U.S.C. section 11302(a)(2)(C);
- (iii) children and youths who are living in cars, parks, public spaces, abandoned buildings, substandard housing, bus or train stations, or similar settings; and

(iv) migratory children (as such term is defined in section 6399 of Title 20) who qualify as homeless for the purposes of this subtitle because the children are living in circumstances described in clauses (i) through (iii).

Participant: A household who may or may not be a client but is receiving OHCS-funded services.

Pet Deposit means a security deposit required by a landlord in order to house an individual or family. Pet deposits are limited to one pet. Pet deposit does not include monthly pet rent or repayment of any damages by a pet exceeding the pet deposit. Other sources of funding must be deferred first and, pet deposit assistance is only eligible when other sources of funds cannot be obtained and providing a pet deposit is necessary and documented in the client file to ensure stability in housing.

Priority Population means persons the grantee/subrecipient has determined as having the greatest need and receiving services first (such as veterans and homeless families with children).

Rent Arrears means past due rent owed to a current landlord. Grantees and subgrantees have the discretion to limit payments for rent arrears. Arrears may also include other rental-related expenses incurred, such as filing fees, property damage, court fees or lease break fees to a previous landlord (or collection agency) when required by a prospective landlord., with a case manager's supervisor's approval.

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

Subgrantee(s): Entities that, by contract with the grantee agency, provide assistance payments/services and may receive funding directly from the grantee agency. Through its agreements with grantee agency, subgrantee(s) must comply with all requirements for the program. Subgrantee(s) include a grantee's subcontractors, contractors, vendor, subgrantee(s)s and any subcontractors, contractors, vendors or subgrantee(s) of a subcontractor, contractor, vendor or subgrantee(s).

Target Population means persons a grantee/subrecipient wishes to reach out to who are under-represented in their service population.

Veteran has the meaning given in ORS 408.225 and includes a person who served in the military, naval, or air service that has been discharged or released from that service and has been determined by the United States Department of Veteran's Affairs to be eligible to receive any benefit from that Department.

(End of Document)