

Oregon Housing and Community Services

State Homeless Funds Program Operations Manual

**Emergency Housing Assistance (EHA)
State Homeless Assistance Program (SHAP)
Low Income Rental Housing Fund (LIRHF)**

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1. Program Summary

Emergency Housing Assistance (EHA) provides state funds to supplement effective existing local programs and/or establish new programs designed to prevent and reduce homelessness. EHA funds are available for the following program components: street outreach, emergency and transitional shelter; transitional housing; homelessness prevention; supportive in-home services; rapid re-housing; data collection; and community capacity building designed to enhance, expand or sustain homeless services.

The **State Homeless Assistance Program (SHAP)** provides operational support for emergency shelters and related client supportive services for homeless individuals, families and households. SHAP funds are available for the following program components: street outreach, emergency and transitional shelter; and data collection.

The **Low Income Rental Housing Fund (LIRHF)** program provides short-term and medium term rental assistance to very low income tenants who are unstably housed and at risk of homelessness. Assistance includes rent payments, housing related deposits and rent arrears*. Funds are available for the following program components: homelessness prevention; rapid re-housing; and data collection..

Note*: See Allowable Program Components and Expenditures section for definition of rent arrears.

EHA program funding comes from legislatively approved state general funds and the Document Recording Fee (DRF). EHA general funds are allocated on a biennial basis and DRF funds are distributed quarterly. The legislatively approved portion of DRF funding for Veterans requires separate tracking and reporting of Veteran clients and expenditures

SHAP and **LIRHF** program funding comes from legislatively approved state general funds allocated on a biennial basis.

2. Client Eligibility

Table 1: Client Eligibility Table			
	Emergency Housing Assistance (EHA)	State Homeless Assistance Program (SHAP)	Low Income Rental Housing Fund (LIRHF)
Homeless Status	<ul style="list-style-type: none"> literally homeless imminent risk other federal statutes fleeing DV unstably housed 	<ul style="list-style-type: none"> literally homeless other federal statutes fleeing DV 	<ul style="list-style-type: none"> literally homeless imminent risk other federal statutes fleeing DV unstably housed
Income Requirement	80% or below area median income	no income requirements	50% or below area median income

(A) *Household Composition*

Homeless households are eligible to receive **EHA**, **SHAP** and **LIRHF** funded services; and unstably housed households can receive **EHA** and **LIRHF** services. “Household” means an individual living alone, family with or without children, or a group of individuals who are living together as one economic unit. Legislatively targeted populations for **EHA** include veterans, seniors over 65 years of age, disabled persons, farmworkers, and Native Americans.

(B) *Housing Status*

Eligible applicants for program services must meet one of the following categorical definitions of homeless and at risk of homelessness:

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

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

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

- The primary nighttime residence will be lost within 14 days of the date of application for homeless assistance;
- No subsequent residence has been identified; **AND**
- The individual or family lacks the resources or support networks (e.g., family, friends, faith-based or other social networks) needed to obtain other permanent housing.

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

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

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

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

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

Category 5: Unstably Housed—Individual or family who:

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

(C) Income

There is no income eligibility requirement for **SHAP** funded assistance.

EHA-provided services require applicants to be low income; i.e., gross household income at or below 80% of area median income.

LIRHF-funded rental assistance requires applicants to be very low income; i.e., gross household income at or below 50% of area median income.

Income includes the current gross income of all adult household members. Income earned by household members who are minors or full-time students **and** are not considered heads of household is excluded. While household assets should be identified to determine that a program applicant lacks the resources to obtain or retain permanent housing, they are generally not counted as income.

(D) Veteran Status

Eligible applicants for **EHA DRF** veterans funding must meet one of the following conditions as documented with original discharge papers or DD214 Identification:

- (1) Served on active duty with the Armed Forces of the United States for a specified period of time as further defined in ORS 408.225 and was discharged or released from active duty under honorable conditions;
- (2) Received a combat or campaign ribbon or an expeditionary medal for service in the Armed Forces of the United States and was discharged or released from active duty under honorable conditions; **OR**
- (3) Is receiving a non-service-connected pension from the United States Department of Veterans Affairs.

(E) *Citizenship and Residency*

There is no client citizenship or residency requirement to be eligible for EHA-, SHAP- and LIRHF-funded assistance.

(F) *Eligibility Documentation*

(1) Housing status and income verification and related documentation must be obtained and available in client files. In the case where client files are collected and maintained electronically, required documentation must be made available to OHCS in paper form when requested.

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

- **Third-party documentation**, where it is available, is the preferable form of documentation. Third party documentation can include employer, landlord, public benefit worker, agency service provider, etc. Written verification sent directly to program staff or via the applicant is preferred.
- **Intake Worker Observation** may include oral statements made by a social worker, case manager, or other appropriate official at an institution, shelter, or other facility and documented by the Intake Worker. Where the Intake Worker is not able to obtain a written or oral statement from a social worker, case manager, or other appropriate official at an institution, shelter, or other facility, the Intake Worker must document in the case file his or her due diligence in attempting to obtain a statement from the appropriate official.
- **Participant Self-Certification** requires a written and signed document by the individual or head of household seeking assistance attesting to the facts for which they are certifying. A third-party may be designated by a participant to sign documents on their behalf when they are unable to do so. It is the responsibility of the subgrantee agency to provide access to language interpretation services and assistive devices necessary for participants to understand the documents they are certifying.

3. Allowable Program Components and Expenditures

EHA, SHAP and LIRHF can be used in **one or more** of the following eight program components, in accordance with Table 2:

- (A) Street Outreach
- (B) Emergency & Transitional Shelter (inclusive of motel/hotel vouchers)
- (C) Transitional Housing
- (D) Homelessness Prevention
- (E) Rapid Re-housing
- (F) Supportive In-Home Services

(G) Community Capacity Building

(H) Data Collection

NOTE: LIRHF Funding

The Low Income Rental Housing Fund can only be used to provide very low income (50% AMI) households with rent-related assistance and data collection within the homelessness prevention and rapid re-housing program components.

NOTE: Veteran Services

Services funded with **EHA DRF Veterans** funds include all service components available through the general EHA program, but are restricted to eligible clients that meet the EHA definition of veteran as documented by official discharge papers or DD214 Identification. Additional services may include, but are not exclusive to, coordination and linkage with Veterans benefit and advocacy programs; cost of acquiring and/or expediting DD214 documentation; and financial assistance (deposits, credit reports, etc.) to increase access to housing, including utilization of VASH vouchers.

(A) Street Outreach

EHA and **SHAP** funding can pay for street outreach services for the specific purpose of reaching out to unsheltered homeless people; connecting them with emergency shelter, housing, or critical services; and providing urgent, non-facility-based care. Eligible services include, but are not exclusive to:

- (a) Conducting an initial assessment of applicant needs and eligibility;
- (b) Providing crisis counseling;
- (c) Addressing urgent physical needs, such as providing meals, blankets, clothes, or toiletries;
- (d) Actively connecting and providing information and referrals to needed services;
- (e) Cell phone costs of outreach workers;
- (f) Case management activities;
- (g) Emergency health services to the extent that other appropriate services and treatment are unavailable or inaccessible within the community;
- (h) Emergency mental health services to the extent that other appropriate services and treatment are unavailable or inaccessible within the community; and
- (i) Travel expenses incurred by outreach workers, social workers, medical professionals or other service agency employees during the provision of allowable street outreach services.

(B) Emergency Shelter

EHA and **SHAP** funding can pay for the costs of maintaining and operating **Emergency Shelter** facilities whose primary purpose is to provide a temporary or transitional shelter to homeless households in general or for specific populations of the homeless and which does not require occupants to sign leases or occupancy agreements*.

Emergency shelter types may include:

- **Day Shelters:** temporary daytime accommodations and services for individuals and families who meet the definition of literally homeless as described under Client Eligibility and are sleeping on the streets, lack a fixed, regular and adequate nighttime shelter and/or are living in an emergency shelter.
- **Transitional Shelters:** emergency shelter projects with a primary purpose to provide temporary or transitional shelter and essential services to all eligible clients in general and/or for specific populations of the homeless. They do not require occupants to sign leases or occupancy agreements. Some transitional shelter programs have a comprehensive service focus and participants may stay for longer than 3 or 6 months.
- **Mass Shelters:** high volume, high turnover emergency shelters where multiple individuals and/or family households sleep in a large room with multiple beds.
- **Hotel/Motel Vouchers:** used as emergency shelter in those areas and times when no emergency shelter is available.

***NOTE:** Occupancy Agreements do not refer to a participant's agreement to shelter facility rules and expectations of behavior (e.g., code of conduct).

(1) Shelter Facility Operations

EHA and **SHAP** funding can pay for the costs of maintaining and operating a facility whose primary purpose is to provide temporary or transitional shelter to the general homeless or specific populations of the homeless. Eligible facility costs include, but are not exclusive to:

- (a) Facility acquisition, conversion or rehabilitation costs*;
- (b) Lease or rent payments;
- (c) Utilities;
- (d) Security equipment or service;
- (e) Janitorial supplies and service;
- (f) Facility management;
- (g) Repairs; and
- (h) Furnishings, etc.

NOTE: Shelter facility new construction is **NOT** an eligible expenditure.

***NOTE:** If rehabilitation or conversion costs exceed the limits identified in Exhibit C of the Master Grant Agreement, prior approval by OHCS is required. Prior approval of facility acquisition is required, regardless of cost.

(2) Shelter Resident Support Services

EHA and **SHAP** funding can pay to meet the essential needs of shelter residents to stabilize their housing situation and facilitate transition out of shelter into more stable housing. Eligible support service costs include, but are not exclusive to:

- (a) Intake and case management including pre-eligibility determination for housing and other needed services;
- (b) Housing relocation (e.g., first and last month's rent payments and arrearages*, application fee, security deposit, utility deposit);
- (c) Food and clothing;
- (d) Crisis intervention/counseling;
- (e) Transportation; and
- (f) Information and linkage to longer term services, etc.

NOTE: Support services must be made available to households receiving hotel or motel vouchers to ensure quick and successful transition to more stable housing.

***NOTE:** Rent arrearage is defined as: past due rent owed to a current or previous landlord. If arrears are owed to a previous landlord, these arrears may be paid, but only when there is documented evidence that payment of those arrears is necessary for the participant to obtain permanent housing and maintain stability in that housing. Payment of arrears is restricted to a one-time payment for up to 6 month's past due rent.

(C) *Transitional Housing*

EHA funding can pay for temporary housing and services intended to facilitate a homeless household's transition to permanent housing within a reasonable amount of time (usually less than 24 months). Transitional Housing is designed to provide interim support to successfully move to and maintain permanent housing. In contrast to transitional shelter, transitional housing requires program participants to sign leases or occupancy agreements.

Eligible services include, but are not exclusive to:

- (1) Transitional housing operational costs such as rent, maintenance, security, utilities;
- (2) Transitional housing unit(s) acquisition, conversion or rehabilitation costs*;
- (3) Housing relocation assistance, including staff time locating permanent housing and related upfront housing costs, such as application fees, moving costs, deposits;
- (4) Case management; and
- (5) Education and training in such areas as personal finance and budgeting, job search and literacy.

NOTE: Transitional housing unit(s) new construction is **NOT** an eligible expenditure.

***NOTE:** If rehabilitation or conversion costs exceed the limits identified in Exhibit C of the Master Grant Agreement, prior approval by OHCS is required. Prior approval of transitional housing unit(s) acquisition is required, regardless of cost.

(D) *Homelessness Prevention*

EHA and **LIRHF** can pay for prevention services to enable households who are at imminent risk of homelessness or unstably housed to regain stability in their current housing or other permanent housing. Eligible services include, but are not exclusive to:

1) EHA

- (a) Housing costs such as rent payments and arrearages*, utility payments and arrearages, moving costs, landlord required deposits and application fees;
- (b) Supplemental rent subsidy for clients receiving HOME TBA assistance.
- (c) Case management and housing relocation assistance; and
- (d) Self-sufficiency activities including education and training in such areas as personal finance and budgeting, job search, and literacy.

2) LIRHF

- (a) Short-term rent assistance, defined as three months or less, and medium-term rent assistance, defined as more than three months, but not exceeding twenty-four months; and
- (b) Application fees, landlord required deposits, utility deposits and utility and rent arrearages* required for move into permanent housing;

Note*: Rent arrearage is defined as: past due rent owed to a current or previous landlord. If arrears are owed to a previous landlord, these arrears may be paid, but only when there is documented evidence that payment of those arrears is necessary for the participant to obtain permanent housing and maintain stability in that housing. Payment of arrears is restricted to a one-time payment for up to 6 month's past due rent.

(E) *Rapid Re-Housing*

EHA and **LIRHF** funding can pay for rapid re-housing services to enable households who are literally homeless to transition directly to permanent housing. Eligible services include, but are not exclusive to:

(1) EHA

- (a) Housing costs such as rent payments and arrearages*, utility payments and arrearages, moving costs, landlord required deposits and application fees;
- (b) Supplemental rent subsidy for clients receiving HOME TBA assistance.
- (c) Case management and housing relocation assistance; and
- (d) Self-sufficiency activities including education and training in such areas as personal finance and budgeting, job search, and literacy.

(2) LIRHF

- (a) Short-term rent assistance, defined as three months or less, and medium-term rent assistance, defined as more than three months, but not exceeding twenty-four months; and

- (b) Application fees, landlord required deposits, utility deposits and utility and rent arrearages* required for move into permanent housing.

Note*: Rent arrearage is defined as: past due rent owed to a current or previous landlord. If arrears are owed to a previous landlord, these arrears may be paid, but only when there is documented evidence that payment of those arrears is necessary for the participant to obtain permanent housing and maintain stability in that housing. Payment of arrears is restricted to a one-time payment for up to 6 month's past due rent.

(F) *Supportive In-Home Services*

EHA funding can pay for supportive services designed to enable persons to continue living in their own homes when in-home supportive programs are not available in their service area. Eligible services include, but are not exclusive to:

- (3) Housing modifications to address mobility or safety barriers;
- (4) Life skills training and assistance;
- (5) Short-term personal care assistance;
- (6) Needs assessment and linkage with appropriate health care management and safety services; and
- (7) Linkage with family support and/or community social support networks.

(G) *Community Capacity Building*

EHA funding can pay for programs, activities and projects that expand homeless prevention and/or intervention program capacity, including emergency shelter, rapid re-housing, and transitional housing. **Use of EHA funding for capacity building must have OHCS approval prior to implementation.** Allowable activities include, but are not exclusive to:

- (1) Convening stakeholders and facilitating community planning to increase shelter beds;
- (2) Developing service agreements with partner organizations to increase homeless access to mental health/substance abuse services;
- (3) Developing peer support programs to expand/enhance staff-provided client services; and
- (4) Networking with public and private landlords to increase the supply of permanent housing for homeless households.

(H) *Data Collection*

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

- (1) HMIS licenses;

- (2) Data entry;
- (3) Equipment upgrade; and
- (4) Staff training, etc.

Table 2: Allowable Program Components and Expenditure Table			
	Emergency Housing Assistance (EHA)	State Homeless Assistance Program (SHAP)	Low Income Rental Housing Fund (LIRHF)
Street Outreach	Yes <ul style="list-style-type: none"> cost of engaging and connecting unsheltered households 	Yes <ul style="list-style-type: none"> cost of engaging and connecting unsheltered households 	No
Emergency and Transitional Shelter	Yes <ul style="list-style-type: none"> operations resident services hotel/motel vouchers facility acquisition*, conversion or rehabilitation 	Yes <ul style="list-style-type: none"> operations resident services hotel/motel vouchers facility acquisition*, conversion or rehabilitation 	No
Transitional Housing	Yes <ul style="list-style-type: none"> operations housing relocation client supportive services TH acquisition*, conversion or rehabilitation 	No	No
Homelessness Prevention	Yes <ul style="list-style-type: none"> client housing costs client supportive services supplemental rent subsidy housing relocation 	No	Yes (limited) <ul style="list-style-type: none"> rent assistance up to 24 months client move-in housing costs
Rapid Re-Housing	Yes <ul style="list-style-type: none"> client housing costs client supportive services supplemental rent subsidy housing relocation 	Yes (limited) <ul style="list-style-type: none"> client move-in housing costs housing relocation 	Yes <ul style="list-style-type: none"> rent assistance up to 24 months client move-in housing costs
Supportive In-Home Services	Yes <ul style="list-style-type: none"> housing modifications to ensure mobility access and safety client supportive 	No	No

	services <ul style="list-style-type: none"> • short-term personal care 		
Community Capacity Building (requires prior OHCS approval)	Yes <ul style="list-style-type: none"> • activities/projects that increase shelter, housing and supportive services capacity 	No	No
Data Collection	Yes <ul style="list-style-type: none"> • equipment upgrade • HMIS licenses • data entry • data reporting 	Yes <ul style="list-style-type: none"> • equipment upgrade • software • HMIS licenses • data entry • data reporting 	Yes <ul style="list-style-type: none"> • equipment upgrade • software • HMIS licenses • data entry • data reporting
Administration	Yes <ul style="list-style-type: none"> • 10% of total allocation 	Yes <ul style="list-style-type: none"> • 10% of total allocation 	Yes <ul style="list-style-type: none"> • 7% of total allocation

***NOTE:** If rehabilitation or conversion costs exceed the limits identified in Exhibit C of the Master Grant Agreement, prior approval by OHCS is required. Prior approval of facility acquisition is required, regardless of cost.

4. General Program Requirements

(A) *Release of Information*

Client information (including identifying the person as a client) should not be released without written authorization from the client. Subgrantees are required to have a signed agency Release of Information form for all clients authorizing the release of information pertinent to determining program eligibility, providing assistance/service, HMIS reporting or other relevant need for sharing information. Release forms must be time-limited and specific as to with whom and what information will be shared. OHCS should be routinely listed as an entity with which client information will be shared as it pertains to data collection and monitoring (including third-party adults and reviews).

Client refusal to provide such authorization **cannot** be the basis for denying program services to otherwise eligible clients.

(B) *Confidentiality*

Subgrantees must have policies and procedures that ensure all client information and records are secure and confidentially maintained. Subgrantee officers, employees and agents must be aware of and comply with the subgrantees' confidentiality policies and procedures.

Confidential records are all applications, records, files, and communications relating to applicants for, and clients of, EHA, SHAP and LIRHF funded services.

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

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

Note to Domestic Violence Providers:

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

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

(C) *Service Termination or Denial of Assistance*

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

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

(D) *Grievance and Appeals Process*

Subgrantee is required to have an established process for addressing client grievances for decisions, including termination or reduction of benefit, denial of benefit or other grievance. At a minimum, the process must include the following components:

- Informs the participant/applicant of the policy and/or policy must be posted in general locations in which a client/applicant is expected to be;

- Informs the participant/applicant that they may contest any subgrantee's or subrecipient's decision that denies (for any reason) or limits eligibility of participant/applicant and/or terminates or modifies any benefits;
- Allows any aggrieved person a minimum of thirty days to request an administrative review;
- Informs the applicant/participant of their right to present written or oral objections before a person other than the person (or a subordinate of that person) who made or approved the decision;
- Informs OHCS of the request for administrative review within 10 days of receiving the request; and
- Informs the applicant/participant and OHCS in writing of the final determination and basis for the decision within ten days of the determination.

Any person or persons designated by subgrantee can complete the administrative review, other than the person who made or approved the decision under review or a subordinate of this person.

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

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

(E) *Nondiscrimination*

Subgrantee is required to comply with all state and federal statutes relating to nondiscrimination. Subgrantee may not take any of the following actions based on race, color, national origin, religion, sex, familial status or handicap:

- Refuse to rent housing or provide services
- Make housing or services unavailable
- Deny a dwelling or service
- Set different terms, conditions or privileges for rental of a dwelling or obtaining services
- Provide different housing services or facilities or different services
- Falsely deny that housing is available for inspection or rental or that services are available
- Deny anyone access to a facility or service.

(F) *Limited English Proficiency*

The Federal government has issued a series of policy documents, guides and regulations describing how subgrantee and subrecipient should address the needs of citizens who have limited English proficiency (LEP). The abbreviated definition of persons with limited English

proficiency is those who: have difficulty reading, writing, speaking, or understanding English, and do not use English as their primary language.

Subgrantee must have an LEP policy document that describes the actions subgrantee took to identify LEP populations in their service area and define actions they will take to provide language assistance and address language barriers. The policy must also state how and how often staff will receive training about assisting LEP persons, how the level of success of the policy will be identified and how changes will be made if needed.

Subgrantees should create a written Language Access Plan (LAP) to provide a framework to ensure all program information is available in languages other than English. Subgrantees who serve few LEP persons may choose not to establish a LAP; however, the absence of a written LAP does not release subgrantee's obligation to ensure LEP persons have access to programs or activities. Links to more information about Limited English Proficiency requirements are provided in the appendices "Applicable Rules and Regulations".

(G) *Conflict of Interest*

Subgrantees are required to have a conflict of interest policy that minimally requires staff and board members to disclose to appropriate board or staff member(s) the conflict or potential conflict; prohibits those with a conflict from voting or making a decision on the matter in which there is a conflict; defines the process for managing and determining conflicts of interest; and documents that staff and board members are aware of and understand the policy.

(H) *Homeless Coordinated Entry Process*

Subgrantees are required to participate in the Continuum of Care coordinated entry process for their service area once established. If one does not exist, OHCS expects subgrantees to be active participants in the design and development of a coordinated entry process for their service area.

Note: Participation is required to the extent that the coordinated entry system is designed to serve homeless households or specific subpopulations of homeless households.

5. Financial Management

(A) *Administration*

Subgrantees are allowed to use up to ten percent (10%) of their total EHA and SHAP allocation for administrative costs, including those allowed for subrecipient organizations with whom the subgrantee contracts. Subgrantees are allowed to use up to seven percent (7%) of their LIRHF allocation for administrative costs. Administrative costs are agency-wide expenses related to general management; oversight; coordination; and evaluation. Allowable costs include, but are not exclusive 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; and

- Equipment rental/purchase, insurance, utilities, IT costs, facilities management, maintenance, and repair that are not program specific but relate to the administration of the agency as a whole.

(B) *Use of OPUS*

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

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

Email: opushelp@hcs.state.or.us

Ph: (503) 986-2099

Toll Free: (800) 453-5511 Option 6

(C) *Request for Funding Documentation*

Subgrantees 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.

(D) *Work Plan and Budget Change Requests*

All budget changes require OHCS approval. Submit a Budget Change Request form electronically to: mga.fiscal@oregon.gov. At the discretion of OHCS, additional information or a Work Plan Amendment Request form may be required.

All work plan amendments require OHCS approval. Submit a Work Plan Amendment Request form electronically to: crd.reports@oregon.gov. At the discretion of OHCS, additional information may be required. Work plan amendments may be requested by the subgrantee and are required when there is a shift in program delivery, the actual number of households/people served greatly exceeds expectations; or if there are unexpected changes in demographics, such as a larger subpopulation than projected, is requesting and needing resources.

(E) *Funds Spend Down*

Subgrantee will be expected to fully obligate or expend grant funds from a previous funding cycle before spending funds from a current funding cycle. OHCS will review subgrantee's grant spending. OHCS may deallocate a portion of subgrantee's grant funds if subgrantee cannot ensure that funds will be spent by the end of the expenditure period.

6. Reporting Requirements

(A) *Data Entry*

Subgrantees are required to enter **EHA**, **SHAP** and **LIRHF** related client and service data into the ServicePoint Homeless Management Information System (HMIS), except for victims of domestic violence clients*. Timely and accurate data entry is critical to ensuring meaningful data analysis and reporting. Therefore, it is recommended that data be entered within three business days and data quality reports be run periodically

(preferably quarterly) using the ServicePoint Data Completeness Report Card (EE) and Continuum of Care APR Detail Report from ART.

Data entry requirements for shelters are:

Emergency or transitional shelters, day or mass shelters, or hotel/motel vouchers are required to collect data and report outcomes using the Entry/Exit method of data collection.

Shelters which meet the three criteria below may be set up in HMIS to use the Night-by-Night method of tracking shelter use:

- The shelter serves a large number of clients on a nightly basis;
- Clients are permitted to spend nights at the shelter on an irregular basis; and
- There is a high degree of client turnover.

Night-by-Night (NBN) data collection involves recording, in HMIS, contacts with each person served. A contact is defined as the date of an interaction between a worker and a client designed to engage the client. A contact must be recorded any time a client is met. Engagements must also be recorded. An engagement is an interaction which results in a formalized assessment or discussion. The date of engagement should be entered into HMIS at the point when the client has been engaged by the shelter worker.

With the NBN method:

- All data required to be collected, is collected at project entry; and
- The duration of each stay can be accurately aggregated to calculate each client's total length of stay in the project.

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

For additional, detailed information about the reporting requirements, refer to the HMIS Operation Manual found at: <https://www.hudexchange.info/programs/hmis/>.

HMIS Universal Data Elements that must be collected include, but are not limited to:

1. Name
2. Social Security Number
3. Date of Birth
4. Race
5. Ethnicity
6. Gender
7. Veteran Status
8. Disabling Condition
9. Living Situation
10. Project Entry Date
11. Project Exit Date
12. Destination

- 13. Personal ID
- 14. Household ID
- 15. Relationship to Head of Household
- 16. Client Location

***Note to Domestic Violence Providers:**

Victim service providers are prohibited from entering data in HMIS; however, they are required to maintain comparable databases of their own design which provide aggregate information and data consistent with HMIS data collection requirements. Projects serving survivors of domestic violence where the recipient is not a victim services provider are required to enter data in their HMIS.

(B) *Reports*

Subgrantees are required to submit quarterly program reports by the 20th of the month following the end of each quarter in accordance with OHCS directives for content and format. At the discretion of OHCS other reports may be required, including a year-end report, when deemed necessary to provide adequate program utilization and performance information.

(C) *Match*

EHA funds can be used as match for case management costs and supplemental rent subsidy for clients receiving HOME TBA rent assistance and other qualifying OHCS and CoC projects. OHCS may require subgrantee to submit periodic reports of this EHA usage.

7. Records

(A) *Case Files*

Documentation of client eligibility and services received must be maintained in client case files (paper or electronically) and include an assessment related to housing barriers and the services/assistance provided to address such barriers. Development of a housing stability plan is required for those clients receiving more than one time only services. Existing assessments and active case plans with other providers may be used and included in the client file.

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

(B) *Records Access*

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

auditing. At the sole discretion of OHCS, access to records shall include the removing of records from the subgrantees' office.

(C) *Records Retention*

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

(<http://arcweb.sos.state.or.us/pages/recmgmt/sched/state.html>);

Find the State Agency General Records Retention Schedules at the Oregon State Archives: (http://arcweb.sos.state.or.us/pages/rules/oars_100/oar_166/166_300.html).

Subgrantees shall retain and keep accessible all such **fiscal 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 EHA, SHAP and/or LIRHF funding, or until the conclusion of any audit, controversy or litigation arising out of, or relating to, EHA, SHAP, and LIRHF.

Subgrantee shall retain and keep accessible all such **program records**, client records, books, documents, papers, plans, and writing for a minimum of **five (5) years** after final payment to client.

8. Monitoring

OHCS will conduct a program monitoring of subgrantees once every three years or sooner if warranted. Fiscal monitoring will be conducted annually unless circumstances require sooner. Subgrantees 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 subgrantees with a written monitoring report inclusive of any findings, concerns or comments. Subgrantees are required to provide timely corrective action to findings and failure to do so may result in the withholding and/or return of EHA, SHAP and LIRHF funds to OHCS.

Subgrantees are required to minimally monitor their subrecipient organizations once during a biennium or the term of the Master Grant Agreement, as determined by OHCS. Subrecipient organization monitoring procedures must be in place and adequately ensure compliance with EHA, SHAP, and LIRHF program requirements. Monitoring reports will be retained by the Subgrantee and available for review by OHCS or other authorized entity. All subrecipients must comply with all program rules and regulations as noted in the Master Grant Agreement, Program Element: Scope of Work.

Subgrantees must notify and receive approval from OHCS when adding subrecipients and/or renewing subrecipients. Notification and approval normally occurs during the Master Grant Agreement funding application process. However, if changes are made outside of the funding application, subgrantees must notify the OHCS Homeless Program Analyst and obtain approval.

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9. Applicable Rules and Regulations

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

1. ORS 456.515 through 456.725: [Housing and Community Services Department](#)
2. ORS 458.505 through 458.545: [Community Services Program](#)
3. ORS 458.600 through 458.650: [Oregon Housing Fund](#)
4. OAR 166-300: [State Agency Record Retention Schedule](#)
5. OAR 813-046: [Emergency Housing Assistance](#)
6. OAR 813-240: [State Homeless Assistance Program](#)
7. OAR 813-049: [Low Income Rental Housing Fund](#)
8. HMIS Data Standards Manual: <https://www.hudexchange.info/resources/documents/HMIS-Data-Standards-Manual.pdf>
9. Limited English Proficiency federal interagency website can be found at: <http://www.lep.gov/> and guidance can be found at: <http://www.hud.gov/offices/fheo/promotingfh/FederalRegistepublishedguidance.pdf> and FAQs can be found at: https://portal.hud.gov/hudportal/HUD?src=/program_offices/fair_housing_equal_opp/promotingfh/lep-faq
10. **This manual** as guidelines for EHA, SHAP and LIRHF are amended from time to time along with all other references made within this manual. All references made in this manual are understood to be as written, and as amended from time to time.
11. **ORS** cited are amended from time to time and can be found at: https://www.oregonlegislature.gov/bills_laws/Pages/ORS.aspx
12. **OARs** cited are amended from time to time and can be found at: <http://arcweb.sos.state.or.us/pages/rules/access/numerically.html>