AGENDA

Special Joint Meeting of:

MID-WILLAMETTE VALLEY HOMELESS ALLIANCE (MWVHA) BOARD OF DIRECTORS & ORS 190 ENTITY

Meeting Location(s):
Tuesday, March 3, 2026
12:00 pm to 1:00 pm
Via teleconference (Zoom)

1. (12:00) WELCOME — CHAIR GORDON

Chair Gordon will open the meeting and confirm that Oregon Public Meeting Law requirements were met with Alliance staff.

2. (12:05) AGENDA — CHAIR GORDON

March 3, 2026 Joint Special MWVHA Board of Directors & ORS 190 Entity Agenda

ACTION (ALL BOARDS): Approve consent agenda

3. (12:10) STATEWIDE SHELTER PROGRAM – REGIONAL COORDINATOR — CHAIR GORDON

Bolger and Gordon will provide background on the Regional Coordinator competition and explain the proposal from Mid-Willamette Community Action Agency.

Supplemental Information:

- **a.** Regional Coordinator intro and background memo from Executive Director (**Pages 03-04**)
- **b.** Considerations list (**Page 05**)
- **c.** Statewide Shelter Program Regional Coordinator next steps letter (**Pages 06-07**)
- **d.** Statewide Shelter Program guidance (**Pages 08-53**)
- **e.** Proposal letter submitted by MWVCAA (**Page 54**)

ACTION (ALLIANCE & ORS190):

Motion to direct staff or designated team to engage in discussions/negotiations with CAA and OHCS. Vote to designate team members.

Or

Motion to proceed as planned with competition.

4. (1:00) ADJOURNMENT — CHAIR GORDON

Zoom Link: https://wesd.zoom.us/j/98295585123?pwd=bjXermwU3JxxHaVrsvPb9ED3k57tDP.1

Meeting ID: 982 9558 5123
Passcode: 514464

One tap mobile
+16694449171,,98295585123#,,,,*514464# US
+16699006833,,98295585123#,,,,*514464# US (San Jose)

Staff Contacts:

Board member inquiries:
Misty Bolger – 503.540.1620, misty.bolger@mwvhomelessalliance.org

General questions or difficulties connecting:
Cassie Bay – 503.540.1627, cassandra.bay@mwvhomelessalliance.org

The Mid-Willamette Valley Homeless Alliance is pleased to comply with the Americans with Disabilities Act (ADA). If you need special accommodations to attend this meeting, please contact MWVHA at (503) 540-1627 at least 48 hours prior to the meeting. Hearing impaired, please call Oregon Telecommunications Relay Service, 7-1-1

Mid-Willamette Valley Homeless Alliance

Board Meeting Memo

To: Emergency meeting of board and ORS 190 Entity

From: Misty Bolger, Executive Director

Date: March 3, 2026

Subject: State Shelter Provider Regional Coordinator Proposal

INTRODUCTION

On Monday, February 23rd the Mid-Willamette Valley Homeless Alliance (MWVHA) Director met one on one with Jimmy Jones, the Director of Mid-Willamette Valley Community Action Agency (MWVCAA), at his request, to discuss the Regional Coordinator competition. After that conversation, Chair Gordon and Bolger received a written proposal for board consideration and discussion. The proposal is an invitation to consider coming to an agreement for a single partnered application for the Regional Coordinator with MWVCAA as the fiscal agent. As the board fiduciary agent, it is the Director's responsibility to bring this to the board.

BACKGROUND/HISTORY

During the Fiscal year 25/26, Governor Tina Kotek signed House Bill 3644 into law, officially establishing the state's first permanent, statewide shelter program. The legislation transitions Oregon away from temporary, emergency funding models and toward a long-term infrastructure designed to provide shelter access across all regions—including rural and underserved areas like Southern Oregon.

House Bill 3644 authorizes nearly $205 million in funding over the next two years to support the maintenance and expansion of emergency shelters. The plan sets measurable goals: maintaining more than 4,800 shelter beds, rehousing 3,300 households, and preventing homelessness for nearly 24,000 others. The program will be administered by Oregon Housing and Community Services (OHCS), which will divide the state into service regions overseen by competitively selected regional coordinators. These coordinators will be responsible for distributing funds, maintaining shelter performance standards, and ensuring equitable access to services.

The Statewide Shelter Program (SSP) aims to maintain the operations, services, administration, and bed capacity of Oregon's statewide Shelter system. SSP prioritizes Low-Barrier Shelters and supports Recovery-Based Shelters as outlined in this manual. SSP funding supports the reduction of unsheltered Homelessness and assists people experiencing Homelessness in transitioning to housing stability. SSP funding comes from state general funds. For Fiscal Year 25/26 contracts

are currently being held between OHCS and the shelter providers. According to an HMIS report approximately 445 year-round beds and 265 weather activated shelter beds are currently state funded in Marion and Polk Counties combined.

In November/December applications were due to OHCS that allowed competitors to demonstrate their competencies to perform this role. On January 30th a letter was sent announcing those who were named Regional Coordinator, the letter also named agencies who tied for this designation. MWVHA tied with MWVCAA, moving both into a second round.

The next steps are outlined in the letter attached but include a request for letters of support (Submitted February 24th), reference checks with OHCS staff, and an interview. The Alliance is scheduled to interview on March 2nd.

To allow for the possibility of discussion and negotiation, Jimmy Jones and Misty Bolger submitted letters to OHCS, on 2/26/2026, informing them of the exploration of this possibility and asking for the intent to award to be delayed one week, if possible.

POSSIBLE OPTIONS FOR THE BOARD:

Board Decides to direct staff or designated team to engage in discussions/negotiations with CAA and OHCS

OR

Proceed as planned with the competition

Benefits of this accepting proposal

Signals alignment and partnership to OHCS, which could help with continued funding for our area.

May reduce perception of competition or fragmentation. This competition has created tension between the Alliance and the provider community.

Current capacity is not sufficient to support this increased demand. Additional staff would need to be hired for this program.

Withdrawing would allow the Alliance to focus on federally required CoC functions, primarily HMIS and CE.

Benefits of rejecting this proposal and if we are awarded this designation

Being awarded this designation (which is not yet determined) would allow for stable funding for the Alliance to grow and sustain for 5 years.

If we are awarded, the Alliance would be poised as a nonbiased funding agency which could result in expanding services to new providers.

MWVHA has worked to strengthen fiscal processes after early learning-stage findings. We are currently poised to take on this fiscal responsibility.

Withdrawing would require the Alliance to re-evaluate priorities.

Would require legal inquiry regarding receiving funds from an agency that competes for funding (HUD)

Oregon Housing and Community Services
725 Summer Street NE, Suite B
Salem, OR 97301
Phone: 971-720-8993
Email: mandee.m.wilding@hcs.oregon.gov

NEXT STEP DETERMINATION

RFA #S-91400-00014184 (OHCS #9185)
Statewide Shelter Program Regional Coordinators

February 3, 2026

Thank you for applying to be a regional coordinator under OHCS's Statewide Shelter RFA. OHCS would like to invite you to participate in round 2 of the RFA evaluation process. Additional details are outlined below.

SCHEDULE

The table below represents a tentative schedule of events. All times are listed in Pacific Time. All dates listed are subject to change:

Event	Date	Time
Interview preference time due	February 10, 2026	10:00 AM
Letters of support due	February 24, 2026	4:00 PM
Interviews	March 2, 2026	
Issuance of notice of intent to award (approximate)	March 20, 2026	
Intent to award protest period ends	7 calendar days after notice of intent to award	

ROUND 2 DETAILS & SUBMISSION ITEMS

1. **Interview.** As part of the evaluation process, your organization is invited to participate in a virtual interview with a panel of OHCS leadership. The interview will be conducted virtually, in a question-and-answer format. OHCS will not be providing specific questions in advance, and no formal presentation or prepared materials are expected or required. Topics include:
    - Financial management and controls;
    - Training and technical assistance;
    - Planning partners and community engagement; and
    - Subgrantee selection process

Interviews will be held on March 2, 2026. The following times are available:

- 11:00AM – 12:00PM
- 1:00PM – 2:00PM

Please respond by the date and time identified in the schedule with your selected time for the interview. If applicants select the same time slot, interviews will be scheduled based on the first reply received by OHCS. Once times are finalized, OHCS will send out a meeting invite.

2. **Letters of Support.** Provide up to 5 letters of support from regional stakeholders such as local governments, housing authorities, tribal governments, nonprofit services providers, culturally responsive organizations, coordinated care organizations, and continuums of care. Letters of support are limited to 2 pages, must be on official letterhead, must be signed by an authorized representative of the organization, and submitted to the SPC via email by the date and time identified in the schedule. Letters of support should state the organization's role and describe the applicant's strengths in being a reginal coordinator in the region(s). Responsibilities of a regional coordinator include:
    - Administer program funds including monitoring and technical assistance
    - Engage and coordinate with the community to develop a regional assessment plan
    - Coordinate shelter and related services in the region to reduce unsheltered homelessness and increase housing stability
    - Knowledge of regional needs
    - Demonstrate commitment to equity

3. **References.** The evaluation committee will be conducting reference checks with OHCS staff regarding an applicant's strengths in the following areas:
    - Fiscal compliance;
    - HMIS data entry and reporting; and
    - Grant management and program implementation practices

EVALUATION OVERVIEW

Responses will be evaluated by an evaluation committee. A total of 100 points are possible.

EVALUATION CRITERIA	POINTS POSSIBLE
Evaluation Item 1: Interview	50
Evaluation Item 2: Letters of Support	20
Evaluation Item 3: References	30
TOTAL POINTS POSSIBLE:	**100**

Applicants progressing to round 2 will compete on an equal basis. Points from the previous round will be set aside and will not carry over. The applicant with the highest score from the final round will receive the highest final ranking. Applicants will be notified of the results.

All terms and conditions outlined in the RFA still apply.

OREGON HOUSING and COMMUNITY SERVICES

Statewide Shelter Program

Oregon Housing and Community Services | Homeless Services Section

800-453-5511

Published 12/23/2025

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Program Summary

The Statewide Shelter Program (SSP) aims to maintain the operations, services, administration, and bed capacity of Oregon's statewide Shelter system. SSP prioritizes Low-Barrier Shelters and supports Recovery-Based Shelters as outlined in this manual. SSP funding supports the reduction of unsheltered Homelessness and assists people experiencing Homelessness in transitioning to housing stability. SSP funding comes from state general funds.

General Program Requirements

Program Standards

Grantees and subgrantees must follow all program standards outlined in this manual. Non-compliance will result in audit findings and may jeopardize funding. This manual includes requirements related to policies and procedures, program operations, financial management, data, and records. Grantees and subgrantees must have stand-alone policies that align with all policy requirements outlined in this manual.

Grantees must ensure that subgrantees have policies and procedures that align with all policy requirements outlined in this manual. OHCS reserves the right to require modifications to any policy or procedure that, in its determination, does not meet basic principles or requirements.

Policies and Procedures

A. Equal Access

OHCS prioritizes equity in the delivery of the SSP. For the purposes of equal access, gender identity means the gender with which a person identifies, regardless of the sex assigned to that person at birth and regardless of the person's perceived gender identity. Perceived gender identity means the gender with which a person is perceived to identify based on that person's appearance, behavior, expression, other gender-related characteristics, or sex assigned to the individual at birth or identified in documents. Sexual orientation means one's emotional or physical attraction to the same and/or opposite gender (e.g., homosexuality, heterosexuality, or bisexuality).

SSP is open to all eligible individuals and families regardless of sexual orientation, gender identity, or marital status. Grantees, subgrantees, and owners, operators, SSP Providers, and managers of Shelters and other facilities

funded in whole or in part by SSP funding must grant equal access to such facilities, and other buildings and facilities, benefits, accommodations, and services according to the individual's gender identity, and in a manner that affords equal access to the individual's family.

Grantees and subgrantees must ensure their admissions, occupancy, and operating policies and procedures protect privacy, health, safety, and security. These policies and procedures must be established or amended, as necessary, and administered in a nondiscriminatory manner to ensure that:

1) Equal access to OHCS programs, Shelters, other buildings and facilities, benefits, services, and accommodations is provided to an individual in accordance with the individual's gender identity and in a manner that affords equal access to the individual's family;
2) An individual is placed, served, and accommodated in accordance with the gender identity of the individual;
3) An individual is not subjected to intrusive questioning or asked to provide anatomical information or documentation, or physical or medical evidence of the individual's gender identity;
4) Nondiscriminatory steps are taken to address privacy concerns, including updating operating policies and procedures; and
5) Eligibility determinations are made for SSP programs without regard to actual or perceived sexual orientation, gender identity, or marital status; and
6) Placement and accommodation of individuals in temporary, emergency Shelters, and other buildings and facilities with physical limitations or configurations that require and are permitted to have shared sleeping quarters or shared bathing facilities shall be made according to the individual's gender identity.

B. Privacy Notification and Release of Information

Grantees and subgrantees must have a written document that meets the requirements of this section if provided to Participant in written form, or they must have a stand-alone policy and/or procedure that describes how the grantee or subgrantee is providing this Privacy Notification verbally to Participants.

A Privacy Notification must be provided to Participants either verbally or in writing, that identifies the following:

"Personally identifiable information is protected by federal laws (Privacy Act of 1974, as amended) and will be collected for the purpose of determining program eligibility, providing assistance/services, data collection, reporting, and monitoring. Personally identifiable information will be shared with Oregon Housing and Community Services (OHCS) and other state agencies that have an information sharing agreement with OHCS and that are administering programs that serve the same or similar Participants s 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 and will be disclosed to Oregon Housing and Community Services without written authorization."

Participants may also be asked to sign a Release of Information by the grantee or subgrantee that includes the Privacy Notification. If required to sign a Release of Information, in addition to the information above, such form must also state:

"Refusal to sign such authorization cannot be the basis for denying program services to otherwise eligible Participants. Participant refusal to sign a Release of Information does not negate the inclusion of personally identifiable in secure reporting to Oregon Housing and Community Services. Oregon Housing and Community Services will de-identify Participant demographic data for the purposes of reporting".

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

C. Confidentiality and Cyber Security

Participant information must be obtained, maintained, and retained in a confidential and secure manner. Confidential records include all applications, records, files, and communications related to SSP Participants. Records include all digital and electronic records, books, documents, papers, plans, and writings. During regular SSP audits and monitoring functions, state, and grantee auditors and examiners must have access to all relevant organizational records.

All grantee/subgrantee officers, employees, and agents must be aware of and comply with the confidentiality and cyber security policy and must acknowledge this awareness in writing.

When records are maintained in hard copy, such records must be kept secure, with limited access to only those who have a legitimate interest in and responsibility for Participant records. When records are maintained electronically, grantee and subgrantee officers, employees, and agents must securely maintain all confidential information.

Employees of grantees and subgrantees must keep computers, tablets, and cell phones secure by:

- Keeping all devices password protected;
- Keeping organization-issued antivirus software installed and updated;
- Ensuring that devices are not left exposed or unattended;
- Installing security and system updates as required;
- Logging into the organization's accounts and systems through secure networks;
- Accessing internal systems and accounts from organization-issued devices and not personal devices.
- Not lending any organization-issued device to other people, and if a device is stolen, changing all account passwords immediately.

Employees of grantees and subgrantees will ensure that:

- Computer terminals are located in a secure location, limiting access to only those with a legitimate interest in and responsibility for Participant records;
- Computer monitors are cleared (or a screen saver activated) immediately after accessing Participant records;
- Computers are locked or turned off if unattended; and
- Access to personally identifiable Homeless Management Information System (HMIS) data is given to only authorized personnel as necessary for SSP-funded programs.

Employees of grantees and subgrantees must comply with their organization's security policies and procedures. Employees of grantee/subgrantees must follow the grantee's and subgrantee's Confidentiality and Cyber Security Policy. Grantees and subgrantees must identify in policies and procedures how security breaches are addressed.

Grantees and subgrantees must have a stand-alone policy and/or procedure for the confidentiality and cyber security of all records. This policy/procedure must include:

Identification of how all Participant records are secured and confidentially maintained;

A statement that all Participant records must be maintained within state guidelines for the proper retention and destruction of records;

1) A requirement that all grantee officers, employees, and agents are aware of and comply with the confidentiality and cyber security policy acknowledgement of such policy, in writing;
2) Procedures for preventing unauthorized access;
3) Reference to or inclusion of procedures for disciplinary action for security breaches; and
4) A statement that all records shall be open for review to federal and state authorized representatives, auditors, and examiners during regular audits and monitoring of OHCS-funded programs.

Domestic Violence Shelter Confidentiality Provision: The address and locations of Shelters operating solely as Domestic Violence Shelter facilities funded, partially or in whole, by SSP 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 SSP; however, such information is protected from public disclosure, except as authorized by federal, state, or local rules and regulations.

D. Grievance/Appeals

Grantees and subgrantees are required to have an established, written, stand-alone policy and/or procedure for addressing Participant Grievance and Appeal requests. Grantees must also ensure that subgrantees have policies and/or procedures that align with OHCS requirements and reflect the intent outlined by OHCS.

Participants must have the right opportunity to Appeal any decision that terminates, denies, limits, reduces, or modifies SSP services for any reason. Participants must also have the opportunity to initiate a formal Grievance in

situations in which a Participant believes they have been erroneously denied SSP services.

Participants must be notified of their ability to Appeal, and grantee's policy must clarify how and when Participants are provided that notice. While the Grievance/Appeal policy and/or procedure can be posted publicly, Participants must receive written notification for any decision that terminates, denies, limits, reduces, or modifies any services. Participants must still receive a denial notice in writing even if the reason is a lack of funding from the grantee or subgrantee.

At a minimum, the policy and/or procedure must include the following components:

1) Inform Participants that they can contest any decision by the grantee or subgrantee that terminates, denies, limits, reduces, or modifies any SSP services and outlines the steps to contest the decision;
2) Inform Participants of the reason for termination, denial, limitation, reduction, or modification of SSP services;
3) Allow any person at least 30 calendar days to request an Appeal of the decision;
4) Inform Participants of their right to present written or oral objections before a person other than the one who made or approved the decision, or a subordinate of that person;
5) Identify reasonable accommodations available for Participants with language, mobility, or disability barriers that would prevent them from participating in the Appeal process and explain how to request such accommodations;
6) Inform Participant in writing of the final determination and the basis for the decision within 10 calendar days of the final determination;
7) Inform Participants that they can submit a verbal or written Grievance if they believe services were erroneously denied; and
8) Provide a response to aggrieved Participant within 10 calendar days of Grievance submission.

Any person designated by the grantee or subgrantee can review the Appeal, except the person, or their subordinate, who made or approved the decision under review.

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

E. Nondiscrimination

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

A statement that grantees will comply with all federal, state, 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 (federal), or victims of Domestic Violence, marital status, sexual orientation, gender identity, or source of income (state):

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

Identification of how applicants and Participants can request reasonable accommodation to access assistance or services, how that process is communicated to applicants and Participants and how those requests are processed.

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

Screening criteria cannot be discriminatory and must be consistently applied. A priority population means persons that are determined to have the greatest need and will receive services first; however, priority cannot be used as a 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 Participants who graduate from a tenant readiness education program that is inclusive of all protected classes. If two requests come in at the same time and both meet the screening criteria, the Participant who also has the tenant readiness education experience could receive priority over the applicant who does not; however, providers must always accept the first request meeting their criteria and prioritization policy.

OHCS reserves the right to require a prioritization of Participants when such prioritization is intended from a specific funding source. Grantees and their subgrantees must adhere to such prioritization required by OHCS and such prioritization requirement takes precedence over any grantee or subgrantee prioritization.

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

F. Limited English Proficiency

Persons with Limited English Proficiency (LEP) are those who have difficulty reading, writing, speaking, or understanding English and do not use English as their primary language.

Grantees and subgrantees must have a stand-alone LEP policy and/or procedure that includes the following:

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

Grantees and subgrantees can create a written Language Access Plan (LAP) to provide a framework to document how their programs will be accessible to all populations in their service areas. Grantees and subgrantee who serve few persons needing LEP assistance can choose not to establish an LAP;

however, the absence of a written LAP does not release them from the obligation to ensure LEP persons have access to programs or activities.

G. Conflict of Interest

In the performance of activities under the SSP, grantees and subgrantees will create no potential or actual conflict of interest, as defined by ORS Chapter 244, for any director, officer, agent, or employee of grantee or subgrantee. A conflict of interest exists if, among other things, a decision or recommendation could affect the finances of the grantee or subgrantee's officers, agents, employees, or their relatives. If a conflict of interest exists, the grantee or subgrantee's officer, agent, or employee must provide 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 where an actual or potential conflict of interest exists.

Grantee and subgrantee must have a stand-alone conflict-of-interest policy and/or procedure that includes:

1) A statement that grantee and subgrantee officers, agents, or employees will create no perceived, potential, or actual conflict of interest;
2) Identification of how officers, agents, and employees are notified of the policy and/or procedure;
3) An outline of the process for disclosing, in writing, any potential or actual conflict of interest;
4) Identification of the process the subgrantee will follow when notice of a perceived, potential, or actual conflict of interest is received, including procedures for staff when employees, board members, friends, or family members apply for SSP services; and
5) Identification of how records are kept of perceived, potential, and actual conflicts of interest.

Grantee and subgrantee must have a conflict-of-interest policy and/or procedure that also outlines the process for disclosing, in writing, any potential or actual conflict of interest. This includes procedures for staff when employees, board members, friends, or family members apply for SSP services. Grantees and subgrantees must comply with the conflict-of-interest

standards for both individuals and organizations. Grantee and subgrantee must keep records to show compliance with SSP conflict of interest requirements.

Organizational Conflict of Interest:

- 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 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 Grant Administrator for guidance in submission of a waiver request, which must be approved by OHCS. A waiver is not required for grantee and subgrantee conducting a Participant's intake assessment to determine program eligibility if the Participant resides in housing where the grantee or subgrantee has ownership interest, to expedite housing placement services and ensure seamless service delivery; and while keeping the Participant engaged in services.
- Grantees and subgrantees cannot steer potential renters to units they own or operate if the renters will use a rent subsidy paid with any OHCS funds. Rent-subsidized tenants can choose to rent from another landlord within the grantee or subgrantee's service area or from the grantee or subgrantee. A waiver request is not required for this situation, but compliance with the conflict-of-interest policy is mandatory.

Individual Conflict of Interest:

Conflict of interest requirements apply to any employee, agent, consultant, officer, or elected or appointed official of the grantee or subgrantee. No person who exercises or has exercised any functions or responsibilities with respect to activities assisted under the SSP, or who is in a position to participate in decision-making processes or gain inside information with regard to activities assisted under the programs, can obtain a financial interest or benefit from an assisted activity. This includes having 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, or 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 for one year following their tenure.

Upon written request, OHCS may grant exceptions, provided OHCS has the authority to do so, to provisions of this section on a case-by-case basis. There is no guarantee that an exception will be approved.

H. Training

Grantee and subgrantee staff who provide direct services must receive relevant training related to SSP delivery.

Required training must occur for staff minimally, within one year from the start date of employment, and current staff must receive training at least once every four years from the date of their previous training. Grantees and subgrantees must track who attended each training, the date of the training, and a synopsis of the training. Training records must be made available to OHCS upon request. Training related to the intent and delivery of the SSP must minimally include:

- Trauma informed services;
- Mental health first aid;
- Harm reduction;
- Supporting victims of Domestic Violence;
- Fair housing;
- Cultural competency, de-escalation, implicit bias, and other racial equity related topics; and
- For those using SSP funds for street outreach, training must include outreach safety strategies.

Training may include HMIS training and technical assistance either for grantees or to support subgrantees in maximizing effective use of the HMIS system for data entry, reporting, and program management. HMIS training may include costs for staffing to conduct trainings related to HMIS, development and management of HMIS-specific workflows, development and management of data quality plans, and providing end-user support, ad hoc reporting support, and troubleshooting related to HMIS.

Training is an allowable use of funds as a Capacity Building expense.

I. Grantee Monitoring

Grantees will be notified 30 calendar days in advance of a monitoring visit and informed of the documents and records to be reviewed, as well as any required staff or Board interviews. OHCS will provide grantees with a written monitoring report that includes any findings, concerns, or comments. Grantees are required to submit timely corrective actions to address findings. Failure to do so can result in the withholding of funds, a requirement to return funds to OHCS, or other remedies as described in the grantee's grant agreement.

J. Subgrantee Monitoring

Records of subgrantee monitoring performed by the grantees or subgrantees will be reviewed during OHCS monitoring. Subgrantee monitoring reports must be retained by the grantee and made available for review by OHCS or other authorized entities. At least once during each biennium, grantees must timely monitor the organizations, activities, and expenditures of their subgrantees to ensure:

- Compliance with grantee's grant agreement and program rules and requirements; and
- Achievement of performance goals.

Grantees must have a stand-alone policy or procedure that identifies the following:

- A requirement to conduct an evaluation of each subgrantee's risk (risk assessment), including any non-compliance with rules or regulations, and a review of the terms and conditions of the applicable subaward to identify risk and determine the appropriate level and type of subgrantee monitoring;
- The frequency of required subgrantee monitoring, which must be at least once during each state budget biennium, or the term of the grantee's grant agreement, whichever is shorter;
- The number of relevant samplings of fiscal transactions required per program;
- The number of relevant samplings of Participant files required, and that such review includes eligibility, notification, and documentation;

- The number of relevant samplings of HMIS entries required to ensure appropriate entry and tracking of Participant information and service transactions;
- A requirement to review subgrantee records related to any equipment purchases to ensure compliance with the Fixed Assets/Equipment requirements as outlined in this manual;
- A requirement to review Participant records to ensure compliance with security, Maintenance, retention, and destruction of records; and
- A requirement to review subgrantee policies and procedures, forms, documents, and notifications to ensure compliance with all program, state, and federal rules, regulations, and requirements.

OHCS reserves the right to require modifications to any policy or procedure that, in its determination, does not meet basic principles or requirements of such a policy/procedure.

Grantees must maintain documentation of their subgrantee monitoring, including:

- A legally binding document that complies with the requirements of the grantee's OHCS grant agreement;
- Documentation confirming a subgrantee's entity type and eligibility to conduct business in the State of Oregon
- Documentation of follow-up that the subgrantee takes timely and appropriate action on all deficiencies pertaining to the award as detected through audits, on-site reviews, and other means;
- A risk assessment of the subgrantee organization, including an evaluation of each subgrantee's risk of non-compliance with rules, regulations, and terms and conditions of any applicable subaward to determine the appropriate level and type of subgrantee monitoring;
- A review of financial and performance reports, along with review of a sampling of fiscal transactions;
- A review of subgrantee policies and procedures, forms, documentation, and Participant records, including eligibility, notifications, and documentation;
- A review of subgrantee asset inventory and equipment purchases;
- A review of Participant records to ensure compliance with security, Maintenance, retention, and destruction of records; and

- Follow-up on all deficiencies related to any SSP funding in accordance with all program rules and regulations.

K. Exit and Separation from Services Policy

It is the policy of OHCS to require of its SSP grantees and subgrantees the development of a trauma-informed and culturally responsive policy establishing standards and processes in the event of a Participant's exit and separation from services. This policy requirement applies to any SSP grantee and subgrantee providing direct services to Participants. The policy must, at a minimum, include the following:

1) Grantees must maintain clear, documented guidelines and expectations around activities and behavior that may result in an involuntary exit from Shelter and separation from services. Participants must be informed of these guidelines and expectations at the point of intake/ program entry;
2) Grantees must maintain clear, documented guidelines and expectations around any potential trespass or timebound service restrictions extending beyond one night. Participants must be informed of these guidelines and expectations at the point of intake/ program entry;

Any measure restricting a Participant's ability to access services should be taken only as a last resort in the most serious cases to protect the health, safety, and respect of Participants, staff, and volunteers;

In the case of an involuntary exit from Shelter or separation from services, grantees must inform Participants of their right to Appeal, including who to contact regarding an Appeal and information about the Appeal process (see also Grievance/Appeals in this manual);

Grantees must maintain documentation of any exit and separation of services within the Participant file, including any steps or actions leading up to the decision that were taken to avoid exit and separation from services; and

Grantees must conduct regular evaluations of available program data to identify where exit and separation from services decisions may disproportionately impact Black, Indigenous, and People of Color, and other people from historically underserved communities.

L. Low-Barrier and Non-Exclusionary Services Policy

Grantees and subgrantees must have a written, stand-alone policy and/or procedure for Low-Barrier and non-exclusionary services for Shelters and Safe Temporary Emergency Placement Sites (STEPS). Sites funded through SSP must have a policy that allows homeless individuals and Households to access Shelter and services without preconditions, unless otherwise noted below.

Grantee must prioritize Low-Barrier Shelters and STEPS. At least 70% of SSP-funded Shelter beds and STEPS must be designated as low barrier. Any remaining balance of SSP-funded Shelter beds and STEPS (maximum of 30%) must be designated as recovery based.

Low-barrier and non-exclusionary sites must allow homeless individuals and Households to access Shelter and services without preconditions. These sites must focus on assessment and triage and intentionally link to permanent housing resources so that people move to housing quickly when resources allow.

To be a Low-Barrier and non-exclusionary site, the following conditions must be met:

1) Sobriety*, treatment, and participation in case management services is voluntary;
2) *Low-barrier and non-exclusionary sites may establish requirements that limit the use of drugs and alcohol on the premises and may establish behavioral expectations that limit disruptive or violent behavior resulting from intoxication; however, the requirement to abstain completely from alcohol or drug use is not a characteristic of Low-Barrier Shelters/STEPS;
3) No documentation of identification, custody, citizenship, or gender is required. Shelters must ensure services are available to all individuals and families regardless of sexual orientation, gender identity, or marital status;
4) Sites accommodate service animals and make reasonable accommodations for belongings. On-site accommodations for pets are also available, and exceptions to this requirement must be approved and documented by the regional coordinator;
5) No charge (including volunteer/labor requirements) to individuals or families for stays, meals, or services rendered; and

6) People with criminal convictions, poor credit, or eviction histories are not excluded. Youth, family, and Domestic-Violence Shelters and STEPS may establish requirements that limit access to individuals with a history or record of prior sex offenses. In limited cases, Low-Barrier and non-exclusionary Shelters and STEPS that do not target domestic-violence support, youth, or families may establish requirements that limit access to individuals with a history or record of prior sex offenses.

M. Recovery-Based Sites

Recovery-Based Shelters and STEPS are sites that require sobriety or drug and alcohol treatment but otherwise meet the definition of Low-Barrier sites and meet the unique needs of people in recovery from drugs and/or alcohol.

To be a Recovery-Based site, the following conditions must be met:

1) Sobriety or drug and alcohol treatment is required;
2) No documentation of identification, custody, citizenship, or gender is required. Shelters must ensure services are available to all individuals and families regardless of sexual orientation, gender identity, or marital status;
3) Sites accommodate service animals and make reasonable accommodations for belongings. On-site accommodations for pets are also available, and exceptions to this requirement must be approved and documented by the regional coordinator;
4) No charge (including volunteer/labor requirements) to individuals or families for stays, meals, or services rendered; and
5) People with criminal convictions, poor credit, or eviction histories are not excluded. Recovery-Based sites may establish requirements that limit access to individuals with a history or record of prior sex offenses.

Eligible Shelter Types, Safe Temporary Emergency Placement Sites (STEPS), Habitability, & Services Requirements

All Shelters, whether basic overnight or housing focused, must meet the Shelter standards outlined in 24 CFR § 576.403 at a minimum, regardless of whether 24 CFR § 576.403 independently applies to such Shelters apart from the SSP. Grantees and subgrantees must document how habitability requirements are being met for all Shelter types funded by the SSP. OHCS will

provide technical assistance as reasonably requested to support compliance with habitability requirements. Note: For the purposes of SSP program delivery, STEPS are not considered Shelters and have their own requirements as described below.

A. Shelter

"Shelter" means a Congregate or Non-congregate facility designed to provide temporary living arrangements for individuals and families experiencing Homelessness. Additional standards not specified in 24 CFR § 576.403 but applicable to any SSP-funded Shelter include:

- The ability to close and lock a door (applies to Basic Free-
- Standing structures only);
- Meals provided to Participants or food preparation facilities onsite with a food access plan. This plan may include community coordination referral to local resources;
- Restrooms onsite and access to shower facilities; and
- Hard-surface walls, floors, and roofing.

A **Basic Free-Standing** Structure or cluster of Basic Free-Standing structures may be considered Shelter if it meets all of the Shelter standards as outlined in this manual.

Basic Overnight Shelter means a Shelter intended to keep Participants safe and out of the elements. Basic Overnight Shelters must meet all Shelter standards as outlined in this manual, but are not required to offer housing-focused case management and supportive services. Examples of Basic Overnight Shelter include:

- Inclement weather Shelters; and
- Other overnight only Shelters or night-by-night Shelters

Housing-Focused Shelter means a Shelter intended to keep Participants safe and out of the elements and to provide Housing-Focused Activities that assist Participants in exiting Homelessness into a stable housing destination. Housing Focused Shelters must meet all general Shelter standards as outlined in this manual, as well as the following additional minimum requirements:

- The facility is accessible to Participants throughout the day and night, seven days a week, and during all seasons and weather;

- An individualized housing service plan (IHSP or comparable plan) must be completed and included in the Participant file. If a Participant exits the Shelter before completing an IHSP, a note explaining the reason for omission should be included in the Participant file; and
- The program provides housing-focused case management and supportive services that assist Participants in exiting Homelessness into a stable housing destination.

B. Safe Temporary Emergency Placement Sites (STEPS)/ HMIS Project Type: Supportive Services Only

"STEPS" refers to Vehicular Camping and Basic Free-Standing Structure programs that do not meet all the Shelter standards outlined in this manual but provide Participants with a place to stay either in their vehicle or in a Basic Free-Standing Structure provided by the site when available, that is secure and free from ticketing. Grantees and subgrantees must document how they meet habitability requirements for all STEPS funded under the SSP. OHCS will provide technical assistance as reasonably requested to support compliance with habitability requirements. STEPS must include the following minimum requirements and standards of habitability, amenities, and services:

- Site management plan, including waste management and safety/ security of the site and its Participants, staff, and volunteers;
- Garbage and sanitation services, including restrooms onsite and access to shower facilities;
- Potable water availability onsite;
- Access to electricity onsite and adequate lighting (there must be sufficient electrical sources to permit the safe use of electrical appliances; however, electricity does not need to be available to each individual space);
- Food access plan, which may include community coordination and referrals to local resources;
- Severe weather response strategy, for when vehicles or Basic Free-Standing structures are not adequate to keep Participants safe during a severe weather event; and
- For Basic Free-Standing structures only: hard-surface floors, weather-proofing, and the ability to close and lock a door.

Note: Please refer to the "Definitions" section of this manual for additional information on terms used in the above section.

Regional Coordination, Assessment & Plan Requirements

A. Regional Coordination

Grantees must submit a regional plan and assessment in accordance with OHCS requirements.

Grantees and subgrantees must administer programs in accordance with the policies and guidance in this manual as well as the terms and conditions of any SSP grant agreements.

B. Regional Assessment and Plan

Grantees must submit a regional assessment and plan as required by OHCS. The regional assessment and plan must detail the services and outcomes planned for their region(s) that will be supported by SSP. This process must involve collaboration with planning partners.

The regional assessment and plan must be updated and provided to OHCS every two years and is subject to OHCS' approval.

Grantees must identify and receive OHCS approval for all subgrantees through the regional assessment and plan. For any additional subgrantees, changes to subgrantees or removal of subgrantees outside of the regional plan, grantees must notify OHCS in writing and receive approval.

C. Grievance Process

OHCS provides a process for reviewing, tracking, and supporting the resolution of disputes between grantees and subgrantees. This process is not a legal proceeding and does not issue binding decisions or orders. It is limited to assistance in resolving disputes directly related to the implementation of the SSP.

The OHCS Grievance process is available when disputes between grantees and subgrantees cannot be resolved through regular communication or existing channels. This process is intended to offer structured support, not to override agreements, laws, or administrative rules.

Steps for Requesting Grievance Support

1) Attempt resolution first. Prior to submitting a request to OHCS, the involved parties must make a good faith effort to resolve the dispute independently. These efforts must be documented and retained by the SSP regional coordinator.
2) Submit a request. If no resolution is reached, either party may submit a formal request for OHCS support using the SSP Request for Grievance Support form available on the HSS Dashboard (or other form as OHCS requires).
3) OHCS response timeline. OHCS will acknowledge the request within 5 business days. OHCS may request additional information or schedule a meeting with the involved parties.
4) Support summary. Within 30 business days of receiving the request, OHCS will provide a written support summary to both parties.

Participant Eligibility

Household Composition

"Household" means an individual living alone or a family with or without children, presenting as one economic unit.

Housing Status

Households accessing SSP-funded programs and services must meet one of the following categorical definitions of Homelessness:

A. Category 1: Literally Homeless

Individual or family who lacks a fixed, regular, and adequate nighttime residence, meaning:

- Has a primary nighttime residence that is a public or private place not meant for human habitation; or
- Is living in a publicly or privately operated Shelter designated to provide temporary living arrangements (including Congregate Shelters, transitional housing, and hotels and motels paid for by charitable organizations or by federal, state and local government programs); or
- Is exiting an institution where they have 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.*

***SSP addendum to Category 1:** An individual or family exiting an institution into a place not meant for human habitation is eligible to receive SSP-funded programs and services, regardless of their housing status prior to entering the institution.

B. Category 2: Imminent Risk of Homelessness

Individual or family who will imminently lose their primary nighttime residence provided that:

1) Residence will be lost within 14 days of the date of application for homeless assistance;
2) No subsequent residence has been identified; and
3) The individual or family lacks the resources or support networks needed to obtain other permanent housing.

Note: Includes individuals and families who are within 14 days of losing their housing, including housing they own, rent, are sharing with others, or are living in without paying rent.

C. Category 3: Homeless Under Federal Statutes

Unaccompanied youth under 25 years of age, or families with children and youth, who do not otherwise qualify as homeless, but who:

1) Are defined as homeless under federal statutes;
2) Have not had a lease or ownership interest in permanent housing during the 60 days prior to the program assistance eligibility determination;
3) Have experienced persistent instability as measured by two moves or more during in the preceding 60 days; and
4) Can be expected to continue in such status for an extended period of time due to special needs or barriers.

D. Category 4: Fleeing/ Attempting to Flee Domestic Violence

Any individual or family who:

1) Is fleeing, or is attempting to flee, Domestic Violence;
2) Has no other residence; and
3) Lacks the resources or support networks to obtain other permanent housing.

Note: "Domestic violence" includes dating violence, sexual assault, stalking, and other dangerous or life-threatening conditions that relate to violence against the individual or family member that either takes place in, or has them afraid to return to, their primary nighttime residence (including human trafficking).

Income

There is no income eligibility requirement for the SSP when accessing basic services. This guidance applies only to SSP funded programs.

U.S. Citizenship

There is no Participant United States citizenship requirement to be eligible for SSP-funded assistance.

Oregon Residency

SSP-funded services and programs must be provided within Oregon, with the following exceptions:

- SSP funds can be used for eligible costs associated with moving out of Oregon to a permanent housing destination, provided there is documentation in the Participant's IHSP or comparable plan confirming the destination as a permanent housing destination.
- If a Household's documented housing status is Category 4, Fleeing/ Attempting to Flee Domestic Violence, SSP funds can be used for eligible costs associated with moving out of Oregon to a safe location, provided there is documentation in the Participant's IHSP or comparable plan confirming the destination as a safe housing option, whether temporary or permanent. No SSP funds can be used for rent, hotel/ motel, utilities, or other services outside Oregon. Allowable costs are restricted to moving costs.
- OHCS does not require strict adherence to grantees or subgrantees' service area boundaries. Participants may start intake and assessment with one grantee or subgrantee and then find housing or move to another grantee or subgrantee's service area. OHCS recommends coordination or a soft hand-off between grantees and subgrantees to meet Participant needs and continue support. Roles and responsibilities should be clearly identified to effectively support the Participant.

Allowable Program Components and Costs

General Guidance

There are financial limits on how SSP funds can be allocated. Below are the minimum and maximum funding requirements for each category:

- At least 50% of the SSP award must be spent on Shelter Operations. Details on Shelter Operations can be found below; and
- No more than 15% of the SSP award can be spent on Capacity Building. Details on Capacity Building can be found below.

Grantees must engage with coordinated entry (CE) systems whenever possible.

Street Outreach

SSP funds can be used for Street Outreach services to reach unsheltered homeless Households, connect them with Shelter, housing, or critical services, and provide urgent, non-facility-based care.

Street Outreach involves going outside of the organization to connect with Households to build rapport and engage meaningfully with unhoused people. This includes assessment, eligibility screening, and case management to help them obtain safe and permanent housing. Street Outreach includes connecting with people experiencing Homelessness who may be disconnected or alienated from supports and services, and is focused on moving people into permanent housing without preconditions for receiving assistance.

OHCS encourages using multi-disciplinary approaches and partnerships with culturally responsive, 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. Health professionals providing specialty outreach services must have proper credentialing and licensure through relevant governing bodies (e.g., Oregon Health Authority, Mental Health and Addiction Certification Board of Oregon, etc.).

A. Requirements for Street Outreach

1) Employ engagement strategies focused on building rapport. This includes basic assessment of needs that engages with the individual or

Household to get an understanding of factors related to immediate health and basic needs, vulnerabilities, and risks, and any other related factors. The basic assessment does not necessarily need to be a formalized assessment tool and completing an assessment tool (such as coordinated entry assessment) is not a precondition for receiving Street Outreach services;

2) Work toward connecting Participants with local (CE) systems as a means of connecting Participants to available permanent housing opportunities, if Participant has this need. If Participant agrees, this will include completing a CE assessment or referring them for a CE assessment/enrollment;
3) Ensure services are person centered, trauma-informed, culturally responsive, and meet requirements of non-discrimination guidelines;
4) Provide appropriate training for staff, covering at least the minimum training requirements identified in the "Training" section of this manual;
5) Use Street Outreach funds to provide Street Outreach consumable purchases, commonly referred to as basic needs supplies (e.g., food, tarps, sleeping bags, clothing, blankets, tents, toiletries, etc.) to non-Participants as a means of building rapport and encouraging program participation;
6) Consumable Purchases must be delivered to the non-Participants where they are at and does not require them to travel or use a voucher or gift card to obtain the item. The goal must be the connection to permanent housing and grantee/subgrantee must utilize donations and other available resources for obtaining these consumable supplies prior to using SSP funds. Efforts to obtain these consumable supplies outside of using state funds must be documented and such document must be available to OHCS, upon request, or the grantee/subgrantee must be able to articulate appropriate measures taken that align with OHCS' intent identified in this manual. Consumable purchases must meet the intent of street outreach, which is to build rapport sufficiently so that the homeless person(s) receives an assessment, eligibility screening, and case management as a Participant (see definitions section) to assist them in obtaining permanent housing; and
7) Enter all Street Outreach events and services into HMIS.

B. Allowable Costs for Street Outreach

1) Assessment, enrollment, and data entry – conducting an initial assessment of Participant basic needs and eligibility, conducting a CE entry assessment, and data entry into HMIS;
2) Street Outreach consumable purchases (see requirements above);
3) Providing crisis counseling;
4) Assessing emergent health, behavioral, and mental health needs, and connecting or referring Participants to these services;
5) Collaborating with health, behavioral, and mental health service providers to connect with Street Outreach Households in the field;
6) Connecting Street Outreach Households to appropriate Shelter services where basic needs can be met, such as access to showers, laundry, food services, and other Shelter resources and services;
7) Organizational costs for hosting Homeless Connect events;
8) Marketing and outreach costs, including written materials, translation, and interpretation services (promotion and marketing must be program-specific to SSP and cannot be for general promotion or marketing of the organization or emergency assistance in general);
9) Cell phone costs for outreach workers and cell phone purchases for Participants;
10) Travel expenses incurred by outreach workers or in conjunction with outreach workers, social workers, medical professionals, or other service providers during the provision of allowable Street Outreach services; and
11) Data entry expenses.

C. Unallowable Costs for Street Outreach

1) Cash gift cards, or cash-equivalent funds provided to Participants;
2) Use of vouchers or gift cards/cash equivalents;
3) Stipends or direct payments to individuals for any purpose; and
4) Personal solar or other powered generators.

Housing-Focused Activities

Housing-Focused Activities are defined in this manual as those that directly connect Participants to critical resources and services that support Participants moving into permanent housing.

A. Requirements for Housing Focused Activities

1) The housing focused activity category must support Participants who are using SSP services;
2) This category is not intended for Homelessness prevention; and
3) An IHSP or comparable plan must be completed and included in the Participant file if housing focused activity funding is used.

B. Allowable Costs for Housing-Focused Activities

1) Rental housing costs such as:
   - First month, last month, pet rent/deposit;
   - Rental arrears;
   - Manufactured home rental space ("lot rent") if used for primary housing;
   - Forward rent if accepted by a landlord as an incentive;
   - Security deposit; and
   - Application fees.
2) Utility deposits, payments, and arrears (including water, sewer, garbage, gas, electricity, phone, and internet);
3) Moving costs (including storage, van/ truck rental, and one-time purchase of move-in necessity basics);
4) Housing focused transportation costs such as bus/ train passes, gas vouchers, and rideshare/ cab fares;
5) Housing focused case management costs such as:
   - Assessment and development of IHSPs or comparable plans;
   - Housing search and placement;
   - Coordinating other resources essential to obtaining and retaining housing;
   - Conducting follow-up and re-evaluation; and
   - Staffing costs;
6) Housing navigation staffing costs; and
7) Data entry expenses.

Shelter Operations

Shelter Operations are those costs associated with maintaining and operating Shelter facilities whose primary purpose is to provide Shelter to the general homeless or specific populations of the homeless.

A. Requirements for Shelter Operations

1) At least 50% of the total SSP award must be used for Shelter Operations; and
2) At least 70% of the Grant-funded Shelters beds must meet Low-Barrier requirements.

Grantees must have an animal policy to ensure the safety and welfare of all Participants and animals. This policy must be available to OHCS upon request. Animal policy should distinguish between Pet and Service Animal and must align with The Americans with Disabilities Act (ADA) requirements.

B. Allowable Costs for Shelter Operations include:

1) Lease or rent payments for the Shelter facility;
2) Utilities (including water or water delivery systems, sewer, greywater recycling or disposal, garbage, gas, electricity, alternative power sources, internet, and phone) for the Shelter facility;
3) Security equipment or services for the Shelter facility;
4) All supplies and services for the Shelter facility (e.g. janitorial, hygiene, office, first aid, and laundry);
5) Facility management costs (e.g. staff to manage day-to-day operations necessary to support the Shelter's needs and core function, essential permits, fire suppression);
6) Maintenance to the Shelter facility. Prior written approval from OHCS is required for any activities beyond Maintenance that meet the definition of Rehabilitation and are essential to maintain Shelter Operations.
7) Furnishings necessary for the operation and maintained bed capacity of the Shelter facility;
8) Food for Shelter facility settings;
9) Costs to board and care for Shelter Participants' animals, such as boarding costs, kennels, leashes, food, toys, veterinary services not available or inaccessible within the community (such costs must be limited and reasonable);
10) Shelter site staff costs;
11) Equipment purchases that are necessary for day-to-day Shelter Operations, including but not limited to:
    - ADA upgrades;
    - Kitchen equipment;

- Onsite or portable toilet/ shower equipment; and
- Storage;

12) Communicable disease and pest prevention treatment equipment/ services;
13) Transportation costs for Shelter Participants;
14) Shelter operation costs listed above as they apply to day centers;
15) Data entry expenses;
16) Translation services;
17) SSP-specific training for staff; and
18) Hotel/motel vouchers as a means of providing Shelter.

C. Unallowable Costs for Shelter Operations include:

1) Housing payments, deposits, or arrears for Shelter Participants;
2) Utility deposits, payments, or arrears for Shelter Participants;
3) Moving costs for Shelter Participants;
4) Operation costs for STEPS sites; and
5) Facility, land, or real property acquisition.

STEPS Operations

"Safe Temporary Emergency Placement Sites (STEPS)" operations cover the costs of operating programs that provide Participants with a safe place to stay either in their vehicle, or in a Basic Free-Standing Structure provided by the site when available. STEPS must be secure, free from ticketing, and meet the SSP requirements outlined below.

A. Requirements for STEPS Operations

1) STEPS must be free from ticketing for SSP Participants;
2) At least 70% of the Grant-funded STEPS must meet Low-Barrier requirements; and
3) Grantees must have an animal policy to ensure the safety and welfare of all Participants and animals. This policy must be available to OHCS upon request. Animal policy should distinguish between Pet and Service Animal and must align with The Americans with Disabilities Act (ADA) requirements.

B. Allowable Costs for STEPS Operations

1) Lease or rent payments for STEPS;

2) Utilities (includes water or water delivery systems, sewer, greywater recycling or disposal, garbage, gas, electricity, alternative power sources, internet, and phone) for STEPS;
3) Security equipment or services for STEPS;
4) All supplies and services for STEPS (e.g. janitorial, hygiene, office, first aid, and laundry);
5) STEPS management costs (e.g. staff to manage day-to-day operations necessary to support the STEPS' needs and core function, essential permits, fire suppression);
6) STEPS site staff costs;
7) Equipment purchases that are necessary for day-to-day STEPS site operations, including but not limited to:
    - ADA upgrades;
    - Kitchen equipment;
    - Onsite or portable toilet/ shower equipment; and
    - Storage;
8) Maintenance to STEPS. Prior written approval from OHCS is required for any activities beyond Maintenance that meet the definition of Rehabilitation and are essential to maintain STEPS operations.
9) Costs to board and care for STEPS Participants' animals, such as boarding costs, kennels, leashes, food, toys, veterinary services not available or inaccessible within the community (such costs must be limited and reasonable);
10) Mobile shower units or access to showers;
11) Portable toilets or access to toilet facilities;
12) Potable water system installation and Maintenance;
13) Laundry supplies and laundry vouchers for STEPS Participants;
14) Electricity installation and Maintenance;
15) Warming and cooling units;
16) Meals and refrigeration equipment;
17) Towing services for abandoned or inoperable vehicles at the STEPS;
18) Fire suppression costs;
19) Communicable disease and pest prevention treatment equipment/services;
20) Costs to remove barriers to meet the habitability standards necessary to be considered Shelter under 24 CFR § 576.403; and
21) SSP-specific training for staff.

C. Unallowable Costs for STEPS Operations include:

1) Tents;
2) Housing payments, deposits, or arrears for STEPS Participants;
3) Utility deposits, payments, or arrears for STEPS Participants;
4) Moving costs for STEPS Participants;
5) Operation costs for Shelter facilities; and
6) Facility, land, or real property acquisition.

Capacity Building

Capacity building covers costs that help grow, develop, and increase the ability to support SSP services for people experiencing Homelessness. It also includes strengthening community efforts and providing technical assistance for grant administration, best practices, system design, and other important areas.

A. Requirements for Capacity Building

No more than 15% of the SSP award can be spent on capacity building.

B. Allowable Costs for Capacity Building include:

1) Training for staff or community partners to develop skills related to addressing homelessness;
2) Technical assistance, including fiscal training, grant management support, policy refinement and development, strategic planning, and improving data collection methods;
3) Establishing or expanding outreach to identify resources, avoid service duplication, cultivate new partnerships and relationships, including with organizations that identify as culturally responsive or culturally specific, and create seamless service pathways;
4) Increasing organization staffing;
5) Training, support, and continued education for HMIS and coordinated entry;
6) Costs associated with compliance;
7) Costs to develop and coordinate grantee's regional plan and assessment; and
8) Costs to acquire and maintain insurance coverage required by an SSP grant agreement.

C. Unallowable Costs for Capacity Building include:

1) Direct assistance to SSP or Shelter Participants; and
2) Shelter facility or STEPS operations costs.

Financial Management

Grantees and their subgrantees must maintain accurate, transparent, and appropriate fiscal controls to ensure proper stewardship of SSP funds. All financial management practices must comply with state and federal laws, rules, policies, and procedures, including Generally Accepted Accounting Principles (GAAP).

Fiscal Standards

These fiscal standards ensure that grantees and their subgrantees have accurate, transparent, and appropriate fiscal controls. Technical assistance regarding these standards can be provided by OHCS when requested by the grantee:

1) Charge administrative duties (executive leadership) to "Administrative Costs";
2) Allocate proportionately to all activities performed;
3) Costs must be allocated and charged to the appropriate grant. Costs cannot be allocated or charged if the costs are not related to the grant.;
4) Explain errors in bank records and avoid moving funds between accounts to prevent insufficient funds;
5) Ensure the accounting system used provides prompt and timely reporting of transactions;
6) Have a written and adequate cost allocation plan that includes all activities and identifies included and excluded costs for an indirect cost rate. This plan must be available for monitoring;
7) Have a documented base for allocating costs;
8) Ensure adequate documentation supports all costs charged to the SSP;
9) Ensure travel costs are adequately documented and support business purposes;
10) Ensure appropriate separation of duties in determining cost allowability, cost allocation, and monitoring activities;

11) Reconcile bank statements monthly and ensure different individuals reconcile and approve the reconciliation (appropriate separation of duties). Ensure appropriate oversight and risk mitigation; and
12) Establish an internal process for reviewing compliance with grant requirements.

Advance Requests for Funds

OHCS is mindful of grantees' operational needs and cash flow in delivering this critical program. OHCS expects grantees to invoice for expenses as reimbursements, but advance payments can be requested in rare cases. These requests must minimize the time between the disbursement and expenditure of funds. Grantees must have financial management systems that meet fund control and accountability standards. Advance requests are subject to OHCS approval and are at OHCS' sole discretion. Requirements for advance requests include:

1) Limiting advance requests to the minimum amount needed and be timed to be in accordance with the actual, immediate cash requirements;
2) Ensuring the timing and amount of advance payments are as close as possible to the actual expenditure of funds for allowable costs;
3) Making timely payments to contractors and subgrantees in accordance with any contract or grant provisions;
4) Use the "Projected" field in OPUS on the Agency Grant Request (AGR) screen to request an advance. Justify the need by stating, "see attached" in the AGR "Comment" field and including an "Advance Request for Funds" form. This form must provide details to justify the request and demonstrate the impact to grantee's operations and cash flow; and
5) Fully expend and report advanced funds in a subsequent request for funds (general ledger submitted in OPUS through a request for funds) before requesting additional funds.

For additional questions or to discuss operational and cash flow needs, email the grant administrator or OHCS at HSD.HomelessServices@hcs.Oregon.gov.

Disallowance of Costs

OHCS is not responsible and will not reimburse grantee for any disallowed costs. If a cost is disallowed by OHCS after reimbursement has occurred,

grantee must repay all disallowed costs to OHCS upon written notice within the time frame specified by OHCS, which in no event shall exceed 30 calendar days.

Grantee must, and must cause its subgrantees to, cooperate with OHCS and all appropriate investigative agencies to assist in recovering invalid payments.

Use of OPUS

The OPUS System is a web-based centralized data system for business-processing needs. Grantee staff must complete training before being authorized to use OPUS. Access is limited to business needs. Training can be provided by OHCS, and a video replay of OPUS Fiscal Training is available on the Homeless Services Section (HSS) Dashboard.

OHCS maintains an OPUS user manual and an OPUS help desk. You can view the OPUS user manual from the OPUS landing page under the "Help" tab after logging in. This manual includes detailed information on notices of allocations, requesting funds, submitting financial status reports, and more.

The OPUS help desk can be reached at:

- Email: opushelp@hcs.oregon.gov
- Phone: 503-986-2099
- Toll Free: 800-453-5511, Option 6

Request for Funds Documentation

Grantees and subgrantees must retain supporting documentation for all costs charged to the SSP and provide evidence that grant funds were spent on allowable costs. Requirements for documentation include:

1) When submitting an Agency Grant Request (AGR)/Request for Funds (RFF) in OPUS, upload documentation of the costs for which payment is requested. Requests without proper documentation will be voided and returned with instructions to resubmit;
2) Submit AGR/RFFs frequently and regularly to meet spending targets. This means at least once every 60 days; however, OHCS prefers and recommends submissions every 30 days. Failure to submit regularly may result in recapture of funds by OHCS; and
3) An AGR/RFF can be denied or voided if:

- Documentation is insufficient;
- Unallowable costs are included;
- Funds are drawn from the incorrect category; or
- The request is submitted after the grant close-out period.

Budget Change Requests

All budget changes require OHCS approval by submitting a "Budget Change Request" form electronically to mga.fiscal@hcs.oregon.gov. Requirements for budget change requests include:

1) Budget changes will not be approved if they limit a grantee's ability to meet minimum percentage standards required for the SSP;
2) No budget change request will be approved if submitted within 10 calendar days of the grant's final Financial Status Report (FSR) due date (08/30), as there is not enough time to process the request and draw the funds to meet the FSR timeline; and
3) OHCS may require additional information for a budget change request, in a form and format specified by OHCS.

Funds Spenddown

Grantees are expected to fully expend grant funds during the grant's performance period. Manage expenditures so that services are available throughout the intended service delivery period. Any funds not drawn within 60 days after the funding period ends are subject to recapture or deallocation by OHCS. Exceptions are not guaranteed and must be requested before the 60-day deadline. Approval of exceptions is at OHCS's sole discretion. Requirements for funds spenddown include:

1) Ensure expenditures are managed so services are available throughout the performance period;
2) Exceptions must be requested before the 60-day deadline and cannot be due to late invoicing by subgrantees or lack of adequate staffing. Approval is at OHCS' sole discretion.

Internal Controls for Fraud

Grantees and their subgrantees must maintain an internal controls framework that meets OHCS standards and ensures compliance with program requirements. This includes having written, documented policies and

procedures, which are subject to OHCS monitoring. Requirements for internal controls include:

1) Establishing and maintaining clear policies and/or procedures for managing program applicants and Participants who may have committed fraud, and for handling public complaints about potential fraud. This includes preventing, detecting, investigating, and addressing fraud;
2) Establishing and maintaining clear policies and/or procedures for preventing, detecting, investigating, and addressing employee fraud;
3) Report all incidents of fraud to the OHCS grant administrator or to OHCS at hsd.homelessservices@hcs.or.gov; and
4) Grantees and subgrantees are responsible for repaying SSP funds to OHCS that were obtained through any act of fraud.

Purchases and Procurement

Purchases of fixed assets (equipment) or property are subject to additional requirements. Grantees must ensure that their agreements with subgrantees include terms and conditions that address these requirements:

A. Fixed Assets (Equipment)

1) Fixed assets valued at $10,000 or more (including computer equipment, electronic equipment, photography equipment, hand tools, etc.) require pre-approval by OHCS before purchase. Purchases made without OHCS approval will be disallowed and SSP funds must be repaid;
2) Requests for approval must be made using the Equipment Purchase Approval form available on the HSS Dashboard (or other form as OHCS requires);
3) Subgrantees must coordinate with their grantee to obtain OHCS' pre-approval for fixed asset purchases. It is the grantee's responsibility to obtain OHCS' pre-approval for any subgrantee's fixed asset purchase. OHCS will not accept requests directly from subgrantees; and
4) A copy of the title to all fixed assets, where titles are available, must be provided to the OHCS grant administrator for fixed assets purchased in whole or in part with SSP funds.

B. Vehicles

1) All vehicle purchases require pre-approval from OHCS; and

2) Requests for approval must be made using the Vehicle Purchase form available on the HSS Dashboard (or other form as OHCS requires).

C. Disposition of Assets

1) Disposal of items funded by the SSP with an original cost or current fair market value of $10,000 or more requires pre-approval from OHCS;
2) Requests for approval must be made using the Equipment Disposition Request form available on the HSS Dashboard (or other form as OHCS requires);
3) Proceeds from the disposal of any fixed asset or vehicle exceeding $10,000 must be used for the intent and purpose from which the funds originated and used for allowable program expenses; and
4) Report theft or loss of fixed assets or vehicles purchased with SSP funds as a disposition request. Insurance claim proceeds must be used for the intent and purpose from which the funds originated and used for allowable program expenses. Documentation of expenditures made with insurance proceeds must be available during monitoring. Consult with an accountant or financial advisor for guidance on how to report insurance proceeds on financial statements.

D. Restrictions

1) Items purchased with SSP funds cannot be used as collateral or to secure financing;
2) Fixed assets and vehicles purchased with SSP funds cannot be donated or borrowed by another entity without OHCS prior approval; and
3) Fixed asset and vehicle purchases are unallowable as an administrative cost.

E. Procurement and Contracting

Grantees and subgrantees must follow all applicable federal, state, and local law and rules, as well as their own internal procurement and contracting policies. OHCS does not prescribe specific procurement procedures.

Program Income

Grantees and subgrantees must not charge any fees to applicants or Participants to access SSP funds. Charging fees creates a disparate impact

on disadvantaged populations and is not allowed. Program income generated from SSP funds are also not allowed, apart from the OHCS-approved sale of equipment or vehicle.

Program income means gross income received by the grantee or subgrantee that is directly generated by or earned as a result of an SSP award during the award period.

Administrative Costs

Grantees can use up to 15% of the SSP funds for administrative costs. Grantee must further allocate SSP funds to SSP Providers, by written agreement. SSP funds expended by an SSP Provider on administrative costs will count toward the grantee's 15% administrative cost cap. Grantee's allocation to each SSP Provider must specify the allowed administrative percentage. Prior to finalizing SSP Provider allocations, grantee must obtain Agency's written approval of the methodology used to determine allocations.

Administrative costs include, but are not limited to:

- Senior executive management personnel costs;
- Administrative staff travel costs;
- General operating costs, such as accounting, budget, human resources, contracting, marketing, audit, and organization insurance;
- Board expenses (excluding meals);
- Organization-wide membership fees and dues specific to homeless systems and programs;
- Facility costs not directly related to Shelter, such as rent, depreciation, operation, and Maintenance;
- Equipment rental or purchase, utilities not directly related to a Shelter or STEPS, and information technology costs; and
- Costs to develop and coordinate grantee's regional plan and assessment;
- Costs to acquire and maintain insurance coverage required by an SSP grant agreement; and
- Costs to maintain adequate digital security.

Data, Submissions and Reporting Requirements

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 three (3) business days after a service has been provided unless the local CoC HMIS policies/procedures require more stringent timeliness. Project types, such as Emergency Shelter and Coordinated Entry may require more stringent data timeliness standards. Data not entered by the regular reporting deadline of the 20th of the following month will be considered out of compliance.

Data Entry Requirements

HMIS Project Setup is an essential responsibility of Grantees and Subgrantees. Grantees and Subgrantees are required to work with their local CoC HMIS Administrator to adhere to the guidance and direction of OHCS staff when creating or modifying OHCS-funded projects in HMIS. Accurate configuration of projects during setup is necessary to ensure data entry and required reporting can be completed. More information on the HMIS standards identified below can be found on the HSS Dashboard.

A. Project Setup and Grant ID:

Each OHCS-funded project is assigned a specific Grant ID tied to the OHCS funding source, which is required for tracking and reporting purposes.

B. Project Type and Data Elements:

HMIS project types are affiliated with specific services and therefore data collection requirements. For funding streams with multiple project types, each project type will have requirements. Each project type will have different requirements dependent on the funding stream, and the Grantee must select SSP as a funding source and follow the project type requirements for SSP.

C. Service Transactions:

Each allowable service that utilizes SSP funds must be represented with a Service Transaction according to CoC Policy or OHCS data standards, whichever is more stringent. Same-day services will have the same Service Start and End Date. Service Transactions that utilize direct financial

assistance, including all payments, arrearages, deposits, fees, landlord engagement and client non-categorical services, must include a HMIS fund source and amount.

All allowable components require HMIS entry/exit and HMIS service transactions in accordance with the Data Collection Requirements.

Comparable Database

The Violence Against Women Act (VAWA) and the Family Violence Prevention and Services Act (FVPSA) contain strong, legally codified confidentiality provisions that limit HUD-defined Victim Service Providers (VSPs) from sharing, disclosing, or revealing victims' personally identifying information (PII), including entering information into shared databases like HMIS. To protect Participants, VSPs must enter Participant-level data into a comparable database that is comparable to and complies with all HUD HMIS requirements and in accordance with OHCS or local CoC's HMIS policies/procedures. Grantees/subgrantees defined as HUD VSPs are still subject to reporting requirements to OHCS of the grant for which they receive OHCS funding even if using a comparable database; however, no PII will be shared, only aggregate counts.

VSP Data Reporting: OHCS Grantees are responsible for submitting all non-HMIS data reporting on behalf of VSP subgrantees to OHCS by the 20th of each month, aligning with standard HMIS data reporting.

Reporting Requirements

Grantees must follow the reporting requirements in the grant agreement.

Participant Files

Documentation of Participant eligibility and services or funds expended on Participants must be maintained in the Participant files (paper or electronically). File documentation will be the basis of OHCS monitoring to ensure grantee and subgrantee comply with program requirements, rules, and regulations. OHCS recommends that grantees and subgrantees use a Participant file checklist to ensure adequate documentation of case files.

Records Access

Grantees, their subgrantee organizations and subgrantee organization's subgrantees are required to permit OHCS, the Oregon Secretary of State's

Office, and the duly authorized representatives of such entities access to, and the right to copy, all program records, applicant/Participant records 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 as necessitated by OHCS or their duly authorized representative.

Records Retention

Grantees, subgrantee organizations and subgrantee organization's subgrantees shall retain all program records pertinent to applicant/Participant services and expenditures incurred in a manner consistent with the requirements of state and federal law and in accordance with the grant agreement.

Records can be stored electronically; however, electronic records must be maintained securely and confidentially and be available in paper format if requested by OHCS for monitoring, audit, or other purposes. HMIS can be used as a method of document collection and Maintenance when it represents all required records and is appropriate.

Grantees, subgrantee organizations and subgrantee organization's subgrantees shall retain and keep accessible all such fiscal and program records, applicant/Participant records, digital and electronic records, books, documents, papers, plans, and writings for a minimum of (6) six years, or such longer period as required by applicable law, whichever date is later. Destruction of records must occur timely and in compliance with applicable law and retention schedules. Retention begins from the later of the date that final payment is made or from the termination of program funding, or until the conclusion of any audit, controversy or litigation arising out of, or relating to the program.

Definitions

The terms included in this section have the meanings provided below. They are listed in alphabetical order.

Appeal means a formal contesting of any decision that terminates, denies, limits, reduces, or modifies a Participant's SSP services for any reason

Basic Free-Standing Structure means an alternative to traditional Shelter that may meet either Shelter criteria or STEPS criteria depending on features,

standards, and amenities. These structures typically do not include a foundation, and are assembled with prefabricated parts and materials. Examples include: Pallet Shelters, Conestoga Huts, yurts, and other tiny home models.

Basic Overnight Shelter means a Shelter intended to keep Participants safe and out of the elements. Basic Overnight Shelters meet all Shelter standards as outlined in this Grant but are not required to offer housing-focused case management and supportive services. Examples include: inclement weather Shelters and other overnight only Shelters or night-by-night Shelters.

Congregate Shelter means a Shelter involving shared living spaces where multiple people sleep in close proximity.

Continuum of Care or CoC means one of the HUD recognized CoCs in Oregon, which area coordinated network of community-based programs and stakeholders that work together to prevent and end homelessness. The CoC ensures that services are client-centered, locally responsive, and aligned with broader state and federal goals to reduce homelessness

Day Center means a facility designed to provide services to individuals and families experiencing Homelessness during specified daytime hours.

Domestic Violence or DV means dating violence, sexual assault, stalking, and other dangerous or life-threatening conditions that relate to violence against the individual or family member that either takes place in, or has them afraid to return to, their primary nighttime residence (including human trafficking).

Domestic Violence Shelter means a Shelter that specifically serves victims of Domestic Violence.

Grievance means a written or verbal complaint initiated by a Participant in situations where they feel their rights have been violated and/or they have received unfair treatment.

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

Housing-Focused Shelter means a Shelter intended to keep Participants safe and out of the elements and to provide Housing-Focused Activities that assist Participants in exiting Homelessness into a stable housing destination. Housing Focused Shelters must meet all general standards as outlined in this manual.

Homeless Management Information System or HMIS is defined in 24 CFR 576.2.

Homelessness means lacking a fixed, regular, or adequate night-time residence in accordance with the Participant Eligibility, Housing Status section of this manual.

Housing-Focused Activities means activities that directly connect Participants to critical resources and services that support Participants moving into permanent stable housing destination.

Low-Barrier means policies and Shelters with minimal preconditions required to access services.

Maintenance means activities that slow or halt deterioration of a building and do not materially add to its value or adapt it to new uses. If activities that would otherwise be considered Maintenance are done as part of an extensive remodeling or renovation of a building, the activities no longer meet the definition of Maintenance and would fall under the definition of rehabilitation.

Non-congregate Shelter means a type of Shelter that provides private sleeping spaces.

Participant means an individual who directly receives services provided by Regional Coordinators or their subgrantee SSP Providers. Participants are the end beneficiaries of the SSP's funding and support.

Planning Partners include Shelter Providers, local jurisdictions, housing authorities, community action agencies, Continuums of Care, Day Center service providers, rehousing services providers, county mental health providers, and coordinated care organizations.

Recovery-Based means sites that require sobriety or drug and alcohol treatment but otherwise meet the definition of Low-Barrier sites, and meet the unique needs of people in recovery from drugs and/ or alcohol.

Rehabilitation means action taken to return a Shelter property to a useful state by means of repair, modification, or alteration. Bringing a property to the point where it is usable, safe, comfortable, hygienic, and habitable, but not expanding or improving on the existing property.

Safe Temporary Emergency Placement Sites or STEPS means Vehicular Camping and basic-free standing structure programs that do not meet all Shelter standards outlined in this Grant but provide Participants with a place to stay

either in their vehicle or in a Basic Free-Standing Structure provided when available, that is secure and free from ticketing.

Shelter means a Congregate or Non-congregate facility designed to provide temporary living arrangements for individuals and families experiencing Homelessness.

Shelter Operations are those costs associated with maintaining and operating Shelter facilities whose primary purpose is to provide Shelter to the general homeless or specific populations of the homeless.

Shelter Provider has the meaning provided in House Bill 3644 (2025).

SSP Provider has the meaning provided in OAR 813-275-0020.

Street Outreach means services to reach unsheltered homeless Households to connect them with Shelter, housing, or critical services, and provide urgent, non-facility-based care.

Vehicular Camping means temporarily residing in a car, RV, camper, or trailer that the Participant provides.

Mid-Willamette Valley
COMMUNITY ACTION
Compassion in Motion

23 February 2026

Misty Bolger
Executive Director
Mid-Willamette Valley Homeless Alliance

Dear Director Bolger,

I am writing today on behalf of the majority of shelter bed providers in Marion and Polk, concerning the regional coordinator designation for Marion and Polk Counties. Both of our organizations have been advanced to a second round of competition by Oregon Housing and Community Services, but I want to pause for a moment and consider other options.

This competition and community conflict, between our organizations, has done significant damage to the provider community, and effectively undermined our collective ability to provide services and act with unity in a time of enormous need for the homeless community. I think we have a unique opportunity to resolve that conflict ourselves, in the best interests of all parties.

We recognize too that the Continuum of Care has an important role in our community. It helps to create unity, coordinate resource opportunities, assess community needs, advocate for additional resources for our collective work, and organize the Coordinated Entry and the HMIS system. We want to see it continue to grow and develop capacity for a larger community role.

We do believe, however, that the Continuum of Care should withdraw from the current competition. The withdrawal is in the best interest of all parties, including the Alliance, the provider community, and most importantly the homeless clients it exists to serve. If the Alliance withdraws, we can commit to:

- The Alliance receives financial support annually (so long as current resource commitments last) to support HMIS, Coordinated Entry, and organizational capacity; as determined by a future negotiation between MWVCAA and the Alliance.

- The Alliance, in partnership with Community Action and other providers, continues to make review-and-ranking recommendations for state funds coming into the region.

Any agreement would need the approval and blessing of the funder, Oregon Housing and Community Services.

We regret how divisive this competition has been for the Marion-Polk community. Our goal here is to effectively manage community resources, provide Alliance capacity, and restore trust and alignment among all parties. If the Alliance chooses to move forward with this plan, we can move quickly to formalize an agreement.

Respectfully,

Jimmy Jones
Executive Director