



January 2025 MEETING

BOARD OF DIRECTORS

Thursday, January 23, 2025

Addendum A

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COMMUNITY ACTION PROMISE

Community Action changes people’s lives, embodies the spirit of hope, improves communities, and makes America a better place to live. We care about the entire community, and we are dedicated to helping people help themselves and each other.

Helping People Changing Lives

Final Fiscal Monitoring Report

ORGANIZATION: MWVCAA
EXECUTIVE DIRECTOR: Jimmy Jones
CHIEF FINANCIAL OFFICER: Kaolee Hoyle
BOARD CHAIRPERSON: Jane Rutledge
REPORT DATE: 12/03/2024
FISCAL YEAR UNDER REVIEW: July 1, 2023 to June 30, 2024
FISCAL MONITOR & POLICY ANALYST: Angelina Ballew

PROGRAM OVERVIEW

Mid-Willamette Valley Community Action Agency, Inc. (MWVCAA) is a long-standing community action agency that serves Marion and Polk Counties. MWVCAA is registered as a 501(c)(3). MWVCAA provides services that include support for the homeless and those at risk of being homeless, energy assistance, weatherization, a day center for homeless youth, nutrition, Head Start, and Child Care Resource and Referral. Along with Oregon Housing and Community Services (OHCS) grant funds, MWVCAA is supported by other funding sources which include the City of Salem, Marion County Children & Families Department, Department of Education, Oregon Department of Human Services, U.S. Department of Housing and Urban Development, U.S. Department of Justice, U.S. Department of Homeland Security, U.S. Department of Veteran’s Affairs, Oregon Community Foundation, and community donations.

Changes since the prior monitoring review: NONE

BASIS FOR REVIEW

The purpose of the on-site review is to fulfill Oregon Housing and Community Services (OHCS) State and Federal grant monitoring requirements. OHCS shall monitor the activities of sub-recipients as necessary to ensure that the subaward is used for authorized purposes, in compliance with State and Federal statutes, regulations, and the terms and conditions of the subaward.

SCOPE OF REVIEW

Although the monitoring review attempts to cover all required areas for testing, this review does not test 100% in order to provide assurance that compliance has been met in all areas reviewed and that all State and Federal grant funds were spent appropriately. OHCS staff completed a review which included financial records, policies and procedures, and files provided by the organization, as well as interviews with relevant personnel. This report cites the results of this review in the compliance areas tested which include; General Administration, Procurement and Contracts, Property & Equipment, Subrecipient Agreements & Monitoring, Financial Management, Allowability of Costs, Employee Compensation, Financial Reporting, Program Income, and Internal Controls. This year’s review was performed as a desk review as a result of the current public health crisis.

SUMMARY OF PRIOR OHCS MONITORING VISIT(S)

The prior monitoring visit was completed in March 2024. There were 3 Required Actions and 0 Recommendations noted in the report. There is one repeat issue noted in this report.

SUMMARY OF SINGLE AUDIT REPORT

The most recent Single Audit Report identified the organization as a **low-risk auditee**. LIHEAP was the major program. There were no audit findings or questioned costs for the fiscal year July 1, 2022 to June 30, 2023.

MONITORING RESULTS

The report cites the results of the fiscal monitoring tests of compliance and review of policies and processes. These are defined as follows:

Required Action: A violation of state or federal rules and regulations, terms and conditions of the grant agreement, program handbook, or other issuances and that require Required Actions. Required actions are steps necessary to correct the violation and include a written response to OHCS describing the action(s) taken and the timeline for the actions taken.

Observations and Recommendations: During the course of the review, areas were identified that raised some measure of concern or there are suggestions to improve operations or internal controls. Your response may or may not be required.

REQUIRED ACTIONS AND TIME FRAMES

Management response is required to address all Required Actions in writing within 30 days from the date of the Draft Monitoring Report. The response shall indicate how the organization will resolve the matter and must include (1) a detailed explanation as to the action to be taken, (2) the date the action was taken (or will be taken), (3) who will take the action, and (4) any relevant documentation to support the action; including but not limited to the accounting records showing the re-classification of expenditures to unrestricted funds.

Required Action #1:

Subrecipient Monitoring - 2 CFR §200.332(d); MGA, Exhibit F.8.(a)

Monitoring includes an evaluation of subaward agreements with supporting documentation, monitoring reports, and the risk assessment process. MWVCAA identified that they did not complete any subrecipient monitoring in FY2024. This finding is a carryforward from the FY2023 report, MWVCAA's response at that time was MWVCAA has established subrecipient monitoring processes and a manual to perform the subrecipient monitoring in accordance with the OHCS Master Grant Agreement and federal subrecipient monitoring requirements. The CFO will perform subrecipient monitoring and intends to work alongside the Program in order to coordinate this work. The monitoring will commence in April 2024 and be completed with final reporting by the end of May 2024

Subrecipients response shall indicate how the organization will ensure the items above will be corrected. The response must include (1) a detailed explanation as to the action to be taken, (2) the date the action was taken (or will be taken), (3) who will take the action, and (4) any relevant documentation to support the action.

Subrecipient Response:

The Agency (MWVCAA) will continue to conduct a review of all sub-recipient invoices submitted for payment. This includes reviews of sub-recipient requests for expenditure reimbursement under contract, and in collaboration with program and fiscal teams, collects supporting documentation (such as receipts and invoices) to verify the eligibility of expenses before processing the reimbursement.

At a minimum the process does include review of:

- Appropriate invoice format and level of detail
- Signature of the Program Director/Program Manager
- Certification or signature by authorized subrecipient representatives as specified in the subaward agreement

The Agency may disallow invoice charges determined to be unreasonable, unallowable, or unallocable. The Agency will work with the Program Director/Program Manager to document the reason for the disallowance and contact the subrecipient organization to request a revised invoice. This plan of action is the current method of reviewing all sub-recipient invoices submitted for payment already in place, and a thorough review will be completed with final reporting by the end of May 2025.

OHCS accepts this response.

RESOURCES

2 CFR 200 - Uniform Guidance

[eCFR: 2 CFR Part 200 -- Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards](#)

Compliance Supplement

[2024 Compliance Supplement | OMB | The White House](#)

Suspension and Debarment verification

[SAM.gov | Home](#)

Oregon Housing and Community Services (OHCS)

[Oregon Housing and Community Services: Welcome to Oregon Housing and Community Services: State of Oregon](#)

Oregon Revised Statutes (ORS)

[Oregon State Legislature \(oregonlegislature.gov\)](#)

Report:

Sustainable Shelter Work Group

Jointly Convened by Governor Tina Kotek and Representative Pam Marsh, HD-5

DATE: December 23, 2024

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Mission and Objectives

Mission: Build a Sustainable Shelter System

The state has significantly expanded its role in Oregon’s shelter system over the past five years. This effort has maintained critical funding for local governments and services providers which has resulted in stabilizing and rehousing thousands of Oregonians. Now we now need to pause, examine services on the ground, and reflect on lessons learned, with the goal of defining and implementing a coherent, effective, and sustainable structure that will support the existing system over the long term. Policy findings will be incorporated into legislation to be introduced in the 2025 session, and budget related needs will inform budget principles to inform the state’s budget writers.



Objectives

1. Shared understanding of state system today through a review of the continuum of existing funding, facilities, services, expectations, and outcomes.
2. Shared understanding of current shelter definitions, standards and requirements, expectations, outcomes, and allowed and actual uses of funds (operations, services, cost per client/shelter/bed, etc.).
3. Shared understanding of current statute, administrative rule, grant agreement framework to inform discussion about what is appropriate in statute versus rule or funding agreements.
4. Discussion of appropriate shelter definitions, standards and requirements, expectations, and outcome/output measures.
5. Discussion of appropriate role of regional coordination.
6. Analysis of existing state funding criteria and approach.
7. Development of a predictable funding formula that is transparent, equitable, data driven and efficient.
8. Confirmation of appropriate administrative requirements and assurance of timely payments.
9. Discussion of current data collection system (gaps, duplication, administrative burden) and the need/potential for technical upgrades.

Work Group Membership

Convenors and Co-chairs

Governor Tina Kotek (*Matthew Tschabold as designee*)

Representative Pam Marsh, Chair: House Committee on Housing and Homelessness

Community Action Agencies Representatives

Jimmy Jones, Mid-Willamette Valley Community Action Agency

Carrie Borgen, ACCESS (Jackson County)

League of Oregon Cities Representatives

Mayor Lucy Vinis, City of Eugene

Amy Fraley, Homelessness Solutions, City of Bend

Daphnee Legarza, City Manager, Lincoln City

Association of Oregon Counties Representatives

Commissioner Cindy Timmons, Umatilla County

Jes Larson, Homeless Services Division, Washington County

Project Turnkey Operator

Andrea Myhre and Dan Easdale, Corvallis Housing First



Navigation Center Operator

Kenny La Point, Mid-Columbia Community Action Council

Shelter Operators

Jody Warnock, Community in Action (Ontario)

Marci Cartagena, Our Just Future (Portland)

Youth Service Provider

Matt Northrop, Maslow Project (Medford)

DVSA Service Provider

Melissa Erlbaum, Clackamas Women's Services

Culturally Specific Organizations

Evelyn McCoy-Harris, Seed of Faith Ministries (Salem)

Kimberly Bacon, Urban League of Portland

Housing Authority

Matt Vorderstrasse, North Bend City/Coos-Curry Housing Authorities

Federally Recognized Tribe

Caroline Cruz, Health and Human Services, Confederated Tribes of Warm Springs

Health/Behavioral Health Service Providers, People Experiencing Homelessness

Amy Boivin, Klamath County Behavioral Health

Regional Coordination Organizations

Tammy Baney, Central Oregon Intergovernmental Council

Kate Budd, Human Services Division, Lane County

Yesenia Delgado, Metro

Philanthropic Organization

Megan Loeb, Oregon Community Foundation

Governor's Office Staff

Matthew Tschabold

Svetha Ambati

Katelyn Coates

Dagny George

Legislative Policy and Research Office Staff

Claire Adamsick

Kaia Maclaren

Oregon Housing and Community Services Staff

Danielle Bautista Sylten



Kay Brooks
Casey Houlihan
Caitlin Rodgers
Mike Savara
Liz Weber

Cross-Cutting Themes

To address the workgroup’s objectives, the workgroup divided its efforts into three subgroups, whose purpose, scope, and recommendations are described in detail in later sections of this report (see pages 11-30). Over the course of workgroup and subgroup deliberations, the following reoccurring themes emerged:

A focus on **outcomes** rather than outputs in shelter services emerged as a major guiding principle of workgroup efforts. This distinction centers the individuals served by the shelter system, and asks: are the people who interact with and move through the shelter system better off for having been served by this system? This focus on outcomes contrasts a possible focus on outputs – beds created, hours spent in case-management, number of people served – which may be easier to measure but which does not capture the progress of a shelter system. The work group was clear that while important, these outputs should not be the ultimate measure of success.

A successful shelter system should ensure the **equity** of outcomes across various groups, particularly groups that have been, because of structural inequities in the housing system, disproportionately impacted by housing instability and homelessness. These groups may include Black and Indigenous Oregonians, as well as the LGBTQ+ community. Robust tracking, accountability, and technical assistance will ensure the shelter system is actively working to support equity and serve all Oregonians justly.

A long-term shelter funding system should maintain **flexibility** so providers can use their experience and on-the-ground expertise to react to the needs of their community. This value is balanced with the need for **accountability**: Oregon Housing and Community Services (OHCS) should create reasonable standards to establish minimum expectations while deferring to provider expertise. A **regional** funding model gives local providers the ability to react to place-based needs and coordinate care across their area. A regionally-coordinated approach will balance local community desire for flexibility while allowing OHCS to track consistent outcomes of state investments. Lastly, a system that is **consistent, predictable, and transparent** is required to enable providers across the state to plan their investments, reduce administrative burden, and hire adequate staff.



Findings

In order to efficiently and thoroughly address the objectives of the Sustainable Shelter Work Group, the membership identified three broad areas of consideration. These topic areas were addressed by subgroups focusing on “How We Fund,” “What We Fund,” and the technical “Data Collection and Reporting” (which also addressed technical assistance and training needs).

“How We Fund” Recommendations Summary:

- Retain Emergency Housing Account and State Homelessness Assistance program funding structure to maintain a “do no harm” approach to entities reliant on this funding.
- Direct any new shelter appropriations through a unified regional coordination model administered by Oregon Housing and Community Services (OHCS).
- Establish a new regional model that allows for provider flexibility for local application of funds, stable and predictable funds, transparency to all interested grantees, as well as clear and consistent standards for outcomes and program reporting. OHCS will review processes and streamline reporting requirements to reduce administrative burden.

“What We Fund” Recommendations Summary:

- Create pathways to fund creative engagement outside of traditional shelters while maintaining consistent habitability standards for sheltering systems.
- Clarify accepted exclusion criteria, taking a region-wide approach to balancing access to services with community safety.
- Direct OHCS to create standards, training, and tracking systems for involuntary shelter exit policies to maintain fairness and ensure equity.

Data and Technical Assistance Recommendations Summary:

- Incorporate HMIS shelter-project-type set up.
- Adopt updated shelter intake data collection requirements.
- Transition to biannual Housing Inventory Count (HIC) submission cadence.
- Develop system performance metrics and outcomes tracking and evaluation.
- Adopt updated shelter bed and unit utilization rate data collection process.
- Adopt qualitative, narrative information collection process.
- Adopt funding pool specific to Data and Training Technical Assistance.



Implementation Framework

<i>How We Fund</i>		
Work Group Recommendation Element	Statute	Administrative Rules or Agreements
Establish Statewide Shelter Program	<ul style="list-style-type: none"> i. Establish state shelter program ii. Establish state policy objectives and values iii. Identify goals and objectives of state shelter program iv. Relevant definitions v. Authorize Oregon Housing and Community Services (OHCS) to establish program service and outcome measures to meet high level goals of state shelter program 	<ul style="list-style-type: none"> i. Administrative rules, program guidance, or funding agreements needed to implement state shelter program as structured in statute
Regional Coordination Model	<ul style="list-style-type: none"> i. Establish regional coordination as primary mechanism for program implementation ii. Authorize OHCS to administer a process soliciting and selecting regions and regional coordination lead entities 	<ul style="list-style-type: none"> i. Administrative rules, program guidance, or funding agreements needed to implement state shelter program as structured in statute <p style="text-align: right;"><i>(continued next page)</i></p>



<p>Regional Plan Requirements</p>	<ul style="list-style-type: none"> i. Establish requirement for regional assessments and planning for shelter program funding eligibility ii. Establish high level minimum requirements for regional assessment and plans <ul style="list-style-type: none"> • Planning partners (<i>local jurisdictions, housing authorities, community action agencies, continuums of care, shelter service providers, day center service providers, rehousing services providers, health and behavioral health service providers, among others</i>). • Status quo assessment (<i>latest data on people experiencing homelessness, including but not limited to disparities, current resources and services</i>). <ul style="list-style-type: none"> a. Community identified needs and priorities related to shelter and shelter services b. Proposed strategies, actions, objectives, timelines, and outcomes c. Proposed funding plan for state shelter program funding iii. Authorize OHCS to establish administrative rules and guidance for regional plans, plan review, and approval. 	<ul style="list-style-type: none"> i. Administrative rules, program guidance, or funding agreements needed to implement state shelter program as structured in statute
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<i>What We Fund</i>		
Work Group Recommendation Element	Statute	Administrative Rules or Agreements
State Shelter Program Eligible Services	<ul style="list-style-type: none"> i. Establish shelter types and services eligible to receive funding • Eligible shelter operation types (<i>emergency shelter, year-round shelter, warming or cool shelter, alternative outdoor shelter, vehicular shelter, transitional shelter, mass shelter, hotel/motel sheltering, navigation center, project turnkey</i>). • Eligible expense types (<i>shelter site acquisition and capital needs, shelter operations, street outreach, day services, case management, among possible others</i>). ii. Authorize OHCS to establish administrative rules and guidance to further define eligible shelter types and services. 	<ul style="list-style-type: none"> i. Administrative rules, program guidance, or funding agreements needed to implement state shelter program as structured in statute ii. Supplemental requirements for eligible shelter types and services <ul style="list-style-type: none"> a. Shelter types (<i>congregate, non-congregate, units</i>) b. Entry barriers (<i>no-barrier, low-barrier, high-barrier</i>) c. Restrictions for accessing services

(continued next page)



<p>State Shelter Program Habitability Standards</p>	<ul style="list-style-type: none"> i. Establish habitability standards for shelter types/sites receiving state funding for capital, operating, or services ii. Authorize OHCS to establish administrative rules and guidance to further define habitability for different shelter types and services. 	<ul style="list-style-type: none"> i. Administrative rules, program guidance, or funding agreements needed to implement state shelter program as structured in statute ii. Additional detail on habitability standards
<p>State Shelter Program Accepted Exclusion Criteria and Shelter Policy Standards</p>	<ul style="list-style-type: none"> i. Establish policy regarding low-barrier and non-exclusionary shelter program ii. Authorize OHCS to establish administrative rules and guidance to further implement standard. 	<ul style="list-style-type: none"> i. Administrative rules, program guidance, or funding agreements needed to implement state shelter program as structured in statute ii. Detail accepted exclusion criteria and shelter policy standards developed by work group
<p>State Shelter Program Exit and Termination Policies</p>	<ul style="list-style-type: none"> i. Authorize OHCS to establish administrative rules and guidance to further implement state shelter program. 	<ul style="list-style-type: none"> i. Administrative rules, program guidance, or funding agreements needed to implement state shelter program as structured in statute ii. Detail program exit and termination policy framework developed by work group



<i>Data and Technical Assistance</i>		
Work Group Recommendation Element	Statute	Administrative Rules or Agreements
Data Collection and Reporting Requirement	<ul style="list-style-type: none"> i. Establish requirement that all regional partners receiving state shelter program funding collect and report service and outcome data to OHCS. ii. Require OHCS to report annually on the services and outcomes of the state shelter program. iii. Authorize OHCS to establish administrative rules and guidance on data collection and reporting standards, processes, and other requirements. 	<ul style="list-style-type: none"> i. Administrative rules, program guidance, or funding agreements needed to implement state shelter program as structured in statute ii. Data collection and reporting standards, processes, and other requirements for recipients of state shelter program funds.



Subgroups

“How We Fund” Subgroup

“How We Fund” Subgroup Objectives

The “How We Fund” Subgroup was directed by Representative Marsh and Matt Tschabold, co-chairs of the Sustainable Shelter Funding Workgroup, to address the following objectives:

- Review and assess the advantages and disadvantages of the current Oregon Housing and Community Services (OHCS) funding models for shelter (regional funding, service provider block grants, direct contracts).
- Develop recommendations and considerations on the best funding model(s) for the state shelter program beginning in the 2025-2027 biennium.

Background and Discussion Topics:

Emergency Housing Assistance (EHA) and State Homeless Assistance Program (SHAP)

These are non-competitive, need-based formula funds that have historically flowed through Community Action Agencies (CAAs). EHA/SHAP funds are state funds disbursed by OHCS. OHCS reports that in last two biennia (2021-2023 and 2023-2025), approximately 7.5 percent of EHA funding has been directed to emergency and transitional shelter operations; between 45-55 percent of SHAP funding has been directed toward these uses.

Pros: EHA/SHAP funding is easily braided with other funding sources; it is flexible and predictable.

Cons: Funding formulas have the potential to overlook community need, and culturally-specific or other organizations outside the Community Action Agency model have not historically received formula-based funds.

Executive Order 23-02 Funds

Funding allocated by the Legislature in response to Governor Kotek’s Executive Order 23-02 (through Senate Bill 5511 and House Bill 5019 in 2023) was disbursed through Multi-Agency Coordination (MAC) groups. This funding was leveraged using the existing federally defined Continuum of Care (CoC) structure, and was focused



on expanding new shelter capacity alongside the work already in progress in each region. In addition to MAC groups, Local Planning Groups (LPGs) representing local nonprofit and government partners were eligible to submit a plan to access Executive Order funding to create shelter beds locally.

Pros: MAC group structure revitalized the Continuum of Care/CAA relationship in some regions, though merging services and sources was at times complicated. Up-front payments from the state encouraged quick action and transparency in decision making.

Cons: Executive Order funds initially focused only on new shelter capacity as opposed to supporting continuing shelter operations. Initial delays in funding disbursements due to legislative process; ongoing challenges for some cities in accessing shelter dollars. Some providers noted struggles with communication and timely payments.

Direct Shelter Funding Awards

Oregon Housing and Community Services (OHCS) issued direct funds to existing shelters for operational supports based on legislative appropriations: \$24.1 million via Senate Bill 5511 in 2023 and \$65 million via Senate Bill 1530 in 2024. OHCS disbursed SB 5511 funds directly to shelters, where SB 1530 funds have been disbursed using the CoC/LPG structure, with the exception of direct awards to shelters where the regional entity has opted out of serving as the pass-through entity.

Pros: Flexibility for local providers, especially where regional entity is not as strong. Allows mission-based nonprofit recipients to fund programs directly tied to their mission without the complication of local politics.

Cons: Lack of communication with regional body limits coordination and can lead to gaps in funding. Lack of shared knowledge and coordination with the regional coordinator and within the local provider community on fund use and intended outcomes.

“How We Fund” Subgroup Recommendations:

Regional Funding Approach

Subgroup members recommend the following long-term funding approach in the 2025-2027 biennium. This regionally-focused approach reflects the values and considerations that emerged in subgroup discussions.



1. The State’s Emergency Housing Assistance (EHA) and State Homeless Assistance Program (SHAP) retain their current structure and formula funding model, and are reserved for current work under the Community Action Agency system and their sub-grantees. This protects current clients and does no harm to individuals currently utilizing EHA and SHAP-funded shelters. Within current structure, pursue reductions to administrative burden in alignment with workgroup values.
2. New sheltering funds in the next biennium would run through a single unified funding system using the following approach:
 - a. In the spring of 2025, Oregon Housing and Community Services (OHCS) announces for Requests for Information (RFIs) or Requests for Quote (RFQs) on a county-by-county basis, as appropriate.
 - b. Interested entities would need to express a commitment to state values as articulated by OHCS, inclusive of
 - i. Low-barrier shelter systems;
 - ii. Anti-racist client and employment practices;
 - iii. Harm Reduction models;
 - iv. Existing shelter beds prioritized for ongoing stability;
 - v. Housing-focused shelter inclusive of vehicular, non-congregate, and other options;
 - vi. Support of culturally-specific providers and of the unique needs of rural communities;
 - vii. Emphasis on development and support for 24/7 shelter models with housing-focused programming (as opposed to 12-hour emergency weather models);
 - viii. Integration and support in those systems for Tribal sovereignty and self-governance in system design;
 - ix. Low-barrier priority for any new shelter beds, with some set-asides for recovery-based designs;¹
 - x. Shelters that are aligned with Housing First practices, inclusive of client choice, evidence-based practices, immediate access to

¹ Please see p. 23 of this report, “What We Fund: Low-Barrier Definition.” No more than 30 percent of the shelter bed capacity in each community is permitted to be subject to required sobriety or drug and alcohol treatment service.



- permanent housing, recovery orientation inclusive of harm reduction systems, individualized client-driven supports, a commitment to social integration over exclusion, and relevant supportive services. Funding and activities associated with the regional program must support best practices that affirm respect for the individual; funds cannot be used for policing activities.
- xi. Commitment not to impose additional requirements that are not in alignment with state-directed philosophy beyond state expectations for sub-contractors;
 - xii. Commitment to fund local Coordinated Entry and Homeless Management Information System (HMIS) Systems to ensure integration with federal system and data orientation;
 - xiii. Outcomes-based shelter systems aligned toward permanent housing but mindful of regional housing stock, the benefit of diverse shelter options to meet diverse needs, positive client impacts, reductions in exits to unsheltered homelessness, and exits to more stable destinations, including to permanent housing.
- c. OHCS will select the best applicant on a county-by-county basis, but submissions will be allowed for a multi-county regional coordinator that is in alignment with OHCS values, outcomes-based contracting expectations, and capacity to develop and accomplish a community plan that outlines service delivery strategies and regional goals. OHCS would commit funding to that regional coordinator for a period of 5-6 years upon which a renewed application would take place to allow for changes to the system depending on which organization is best positioned to deliver on the outcomes.
- d. Once regional coordinators are selected in Spring 2025, OHCS would provide formula funding to the organizations based upon factors such as the number of shelter beds they need to sustain, the number of people experiencing homelessness, and other factors decided upon through an engagement process OHCS would conduct. The state would still be free to fund line-item or direct allocation and pass-through models where there is demonstrated need.



- i. The model would allow for a portion of the formula to be based on past biennia performance of the region. Communities that meet more of their overall objectives and deliver on the outcomes they set will receive a slightly higher weight in the formula than regions that fail to deliver on outcomes they set. OHCS would set up guardrails to ensure smaller regions aren't unfairly penalized but would also ensure that the formula rewards communities that deliver on their commitments with high achievements based on their own individualized goals. OHCS would not be comparing performance between communities, because there are too many variables outside of the control of the system, but they will ensure that the formula prioritizes an outcomes-based orientation.
- ii. OHCS would monitor the formula and modify each biennium to ensure consistent alignment with the commensurate amount of shelter beds that would be supported with the resource.
- iii. OHCS shall create a formal redress process for service providers to report performance issues the regional coordinating groups may be exhibiting. The primary objective of the redress process will not be to adjudicate local decision-making or select shelter sites to receive awards, but to ensure the regional coordinating group is fulfilling their obligations pursuant to the approved regional plan, the various local, state or federal laws or regulations, and the values of the state homeless services system. This redress process for reporting issues will be directed to the Housing Stabilization Division of OHCS, who will engage with the impacted parties to ensure the outcomes-oriented approach to partnering with local experts is being carried out.²

Values for Funding Models:

In discussion of existing funding models, subgroup members developed the following values that a sustainable shelter funding delivery system in Oregon would be expected to put into practice:

² Some members of the subgroup, including subgroup lead, expressed concern that the language in 2(d)iii is weak and insufficient for holding errant parties to account. Further review of this process is necessary.



<p>Provider Flexibility</p>	<p>Deliver funding that can be adapted to the unique needs in each community and enable service providers to lean on best practices for reaching the specific communities they serve.</p> <p>Allow flexible use of funding so that it can be easily paired with other resources, and providers can effectively communicate the impacts of their programming with the broader community.</p>
<p>Regional Coordination</p>	<p>Ensure regional coordination to identify shelter needs and determine how state funds are spent. Regional coordination should support efficient and outcome-oriented use of all available funding, including federal and local funding sources, and minimize any inefficiencies created through indirect allocations. Regional coordination must emphasize collaboration among city, county, tribal and regional governments, and community-based organizations.</p>
<p>Stability, Predictability, and Reduced Administrative Burden</p>	<p>Provide consistent, predictable investments allowing service providers to plan for and successfully implement shelter programs.</p> <p>Reduce administrative burdens on service providers by providing adequate technical assistance, administration allowances, and by streamlining reporting requirements, so that similar information can be reported and collected across multiple funding channels.</p>
<p>Accountability and Transparency</p>	<p>Provide reasonable state oversight that allows communities to decide how funds are distributed, while ensuring that practices are in alignment with state values of human dignity, compassion, and cultural sensitivity.</p> <p>Ensure funding opportunities are accessible to organizations that have not previously received state shelter funds.</p> <p>Create clear and consistent standards for outcomes and program reporting to measure the impact of programs, as well as metrics that are limited to what can be achieved within funding constraints.</p>



Further Considerations

Subgroup members highlighted the following considerations that state leaders and Oregon Housing and Community Services (OHCS) must observe in determining and implementing a new funding methodology.

- Outcomes-based shelter system aligned toward permanent housing but mindful of regional housing stock, the benefit of diverse shelter options to meet diverse needs, positive client impacts, reductions in exits to unsheltered homelessness, and exit to more stable destinations, including to permanent housing.
- The State should recognize the key role of the Continuum of Care (CoC) in local homelessness crisis response systems and work collaboratively with the CoCs to do no harm to system and align with system performance measure in order to leverage HUD funding.
- If a regional funding methodology is used, the State must ensure funding levels are adequate to sustain existing program operations.
- In a regional funding methodology, further consideration must be given to how regional entities are determined and should include feedback from local communities and options for unique approaches across different regions.
- If a new funding methodology is determined, the State should put significant controls in place to ensure there are not adverse impacts on current shelter programs reliant on current funding methodologies.
- A new funding distribution methodology for shelter programs must take into account the distribution and availability of funds for housing programs that help move people out of shelters with funding eligibility for case management and client assistance funds to help shelter guest secure housing.
- Any funding approach should include technical assistance supports to enable providers around the state to implement best practices, ideas, and innovations, and share their work with peers in “communities of practice.”
- Support new and existing shelter operators by developing a “toolkit” that includes strategies for securing other available funding resources.
- Please see implementation notes in the ***Appendix***, page 31.



“What We Fund” Subgroup

The “What We Fund” Subgroup was directed by Representative Marsh and Matt Tschabold, co-chairs of the Sustainable Shelter Funding Workgroup, to address the following objectives:

- Review and assess eligible shelter types, services, and operational costs based on current federal and state guidelines, as well as the advantages and disadvantages of the current framework.
- Consider and recommend changes to the state guidelines for eligible shelter types, services, and operational costs for the state shelter program beginning in the 2025-2027 biennium.

Focus-area Background:

As the subgroup worked through these objectives, members identified four focus areas for possible changes and recommendations. These focus areas fell broadly into two groups: Issues relating to **what models** of shelter and/or service were eligible for funding, and issues relating to the **definition of Low-Barrier Shelter**.

Focus areas concerning what models were funded:

- Vehicular safe rest / safe parking
- Non-congregate shelter standards

Focus areas concerning Low-Barrier definitions:

- Accepted exclusion criteria
- Involuntary exit/separation policies

Vehicular Camping and Supports for Unsheltered Individuals:

Background: Providing safe parking spaces and/or areas of safe rest that are outside of traditional shelter definition to people experiencing unsheltered homelessness has proved to be a successful strategy stabilizing some individuals, as well an efficient mode of connecting people to services. Providers report that although these spaces are not funded through the Executive Order 23-02, they nonetheless require infrastructure investments (lights, toilets, water, among others) and staffing.

Challenge: Adjusting habitability standards for shelters more broadly in order to include vehicular safe-rest could negatively impact the quality of shelters statewide. It is similarly not feasible to update vehicles to fit the habitability standard, and that would exclude vehicles currently included in these models that are not intended for habitation (such as private cars). At the same time, lack of funding for these service



types excludes a successful interim model in the continuum of homelessness from expansion and investment.

Non-Congregate Shelter Standards:

Background: Some regions find that some non-congregate shelters which do not meet the current habitability definitions are nonetheless popular, high-usage shelter options. Their continued operation is challenged because they are not eligible for state-funding through programs that require shelter to meet habitability standards (such as EO-23.02).

Challenge: The needs of non-congregate shelters may be different than congregate in terms of the built environment. Non-congregate shelters may have more practical barriers to providing each unit with habitability requirements, such as individual heating units and hardened-walls. They may nonetheless be filling a need for privacy and autonomy that is desired by shelter users and represent a lower-barrier model than congregate shelters. At the same time, changing habitability standards for shelters generally in order to be inclusive of novel non-congregate models could have unforeseen consequences for shelters statewide.

Accepted Exclusion Criteria:

Background: State-provided definitions of “low-barrier shelter” do not currently address scenarios in which low-barrier shelters may exclude individuals based on criminal-justice-system involvement. Executive Order 23-02 recommends a best-practice of “not excluding] people with criminal convictions, poor credit or eviction histories,” but providers recognize that there are sometimes uses for such (as in family shelters or DVSA shelters, for example).

Challenge: Criminal-justice-involvement can be a major barrier for Oregonians seeking shelter. Rules excluding people on this basis may be a particular barrier for people of color because of overrepresentation in the criminal justice system due to systemic racism. At the same time, shelter-providers may identify uses for these exclusions, such as screening for sexually-harming behaviors in shelters that also serve children. There also may be times when *not* agreeing to limit use may jeopardize the shelters’ ability to find a suitable site in some localities in the state.

Involuntary Exit/Separation Policies:

Background: Policies and guidance for shelter exit-policy currently exists only at the local organizing level. Best practices for shelter exit prioritize communication, equity, and safety. An absence of exit-policies may contribute to unintended negative outcomes for equity and shelter-retention for vulnerable individuals.



Action item: Should the State definitions of eligible shelter include exit policies? Should OHCS and/or local Continuums of Care / Community Action Agencies / Local Planning Groups provide training and technical assistance that further racial equity and the low-barrier model?

“What We Fund” Subgroup Recommendations

Having identified these issues in the current funding model, the What We Fund subgroup worked with Oregon Housing and Community Services (OHCS) staff to craft policy recommendations that would address these topic areas. The resulting policy recommendations are as follows.

Vehicular Camping and Supports for Unsheltered Individuals

OHCS recognizes that providing options for engagement with people living outside or in places not meant for human habitation is a critical part of the system in each region of the state. As part of a broader shelter strategy, OHCS should ensure that each region of the state has a plan to build relationships with and support those living outside through various outcomes-driven strategies that help to ensure people can access housing and support services. These services may include the following:

- Street outreach services, including staffing, vehicles and supplies;
- Pathways for allowing street outreach workers to exit people to permanent housing, shelter, or other solutions based on participant choice and needs;
- The provision of day centers that provide various services for engaging people who live outside, including access to meals, sanitary facilities, mail services, linkage to Coordinated Entry or other permanent housing opportunities, and case management;
- Vehicular camping engagement strategies, including the set-up of specific sites for this purpose
- Support 24/7 access to basic sanitation like handwashing stations and restrooms.

These strategies must be part of a broader approach that ensures people in need of housing services can get access to support regardless of their willingness to engage in other parts of the system, such as shelters or transitional housing.



Safe Temporary Emergency Placement Sites

OHCS Funding Eligibility for Safe Temporary Emergency Placement Sites (STEP)

Safe Temporary Emergency Placement Sites (STEP) includes Vehicular Camping and Basic Free Standing Structure programs that provide participants with a place to stay (either in their vehicle, or in a free-standing structure provided by the site when available) that is secure and free from ticketing, where they have access to garbage and sanitation services, and where site management ensures the safety of participants, site cleanliness and adherence to site rules. Participants in STEP programs are provided access to participant services, if available. A vehicle includes a car, RV, camper or trailer that the participant supplies. Basic Free-standing structures that are structurally sound (hard roof and walls), weatherproof, and have a locking door may also be part of the site. Examples of basic free-standing structures that meet basic standards include Conestoga huts, yurts, and other free-standing and hard-sided cloth structures. Tents do not meet these standards. These structures must be supplied using local resources. OHCS funds will not pay for these structures if they do not meet shelter habitability standards. However, OHCS can pay for operations and services at the site. Programs can use OHCS funds to convert basic-free standing structures to meet shelter habitability standards (See Non-congregate shelter standards).

This Funding Eligibility definition above is only to be used for determination of OHCS-funded sites. OHCS acknowledges that there may be other models that differ in the services and structures provided already in existence across the State. This definition helps to set the expectation for what OHCS funding will and will not pay for but does not impose restrictions on local governments who set up alternative requirements for safe parking. This is an active and changing area of the homeless services response system that will require consistent feedback and updating of guidance to ensure best practices are consistently adopted as they are developed.

STEPs programs are separate from emergency shelter and street outreach program types. Unlike emergency shelter, these programs do not need to meet HUD habitability standards. Street Outreach funding through OHCS may be used to pay for staffing and other vital services that will be based out of or delivered at a site that doesn't meet the vehicular camping and basic free-standing structure, non-congregate shelter or shelter requirements. For instance, a street outreach worker may visit a homeless services site (day center, safe rest village, self-managed sanctioned encampments) to provide necessary linkage to services, even if this site does not meet the requirements to receive state funding under STEP or shelter site.



Street outreach can also be used to pay for staffing and other vital services for sites that do meet vehicular camping and basic free-standing structure requirements.

Programs should seek to be as low barrier as possible, consistent with recommended best practices and have strategies and services available to exit participants out of homelessness as quickly as possible. Services to ensure participants can access housing and other critical services are an eligible cost under this category, and OHCS recommends that all participants be provided these services. Additionally, vehicular camping and basic free-standing structure programs must meet the minimum requirements outlined below:

- Sanitary facilities, including the potential to use porta-potties, and potable water available on-site (may be provided through regular water deliveries if plumbed water is not available or feasible);
- Access to electricity on-site (alternative strategies for ensuring residents have opportunity to recharge devices or access electricity are acceptable, including regular or intermittent opening of nearby facilities to allow for recharging or portable electric generators being made available. Electricity does not need to be available to each individual space);
- Waste management plan, including plan to address spills and RV wastewater disposal;
- Safety and security plan, including evacuation plans and plans to respond to fires or other safety threats, as well as a plan for reasonable site management to ensure the safety of program participants (as determined by localities);
- A plan for food access, which may include referrals to local resources or space onsite that allows for food preparation and storage;
- A severe weather response strategy, recognizing that in the most severe temperatures, vehicles do not represent an adequate option for many households. The severe weather response strategy may leverage other sites or utilize operational funding to create community warming spaces during these times;
- Access to showers on-site or made available through other partnerships;
- Clear and documented processes for requests for reasonable accommodations;
- For sites providing basic free-standing structures: Any basic free-standing structures need to be structurally sound (hard roof and walls), weather-proof, and have a locking door.



Non-congregate Shelter Standards

OHCS recommends updating State Operations Manuals to include existing language from the Executive Order contracts on habitability requirements. (See Appendix A: Habitability Requirements). This section would mirror the federal standards for emergency shelter with some additional and specific requirements as outlined. The standards would match the current state funding such as those through the Executive Order and Shelter Operations Funding.

Accepted Exclusion Criteria and Shelter Policy Standards:

OHCS recognizes shelters may develop specific exclusion criteria based on special considerations for vulnerable populations like youth and domestic violence survivors, insurance requirements, and siting challenges. Such policies and practices can disproportionately affect access to needed shelters for communities who have been systemically oppressed such as LGBTQ+ populations or communities of color. As part of the OHCS goal to further racial equity practices, shelters should minimize exclusion criteria and promote low-barrier practices whenever possible. OHCS will require Grantees to create exclusion criteria guidelines that encompass the following principles:

1. Shelters must follow minimum low-barrier shelter requirements, as described below;
2. Use of racial equity lens to ensure exclusion criteria do not disproportionately limit access to shelter for Black, Indigenous, and People of Color;
3. Culture responsiveness and trauma informed care when setting program admission policies and procedures;
4. Clear, accessible, and documented information on reasons the shelter may deny admissions;
5. Regular evaluation of shelter entry and outcomes data to assess for any disparities, and
6. Regular staff training including but not limited to cultural competency, implicit bias and other racial equity related topics, trauma informed care, harm reduction and fair housing.

Low-Barrier Shelter

Shelters must meet the minimum low-barrier best practices:

- Sobriety and treatment are voluntary*.
- No required documentation of identification, custody, citizenship, or gender. Furthermore, shelters must meet the Department of Housing and Urban



Development's Equal Access Rule, 81 FR 64763, to ensure services are available to all individuals and families regardless of sexual orientation, gender identity, or marital status; and

- Shelter accommodates pets and belongings.

*OHCS funding can be used to fund shelters that require sobriety and/or drug and alcohol treatment services but otherwise meet the definition of low-barrier shelter as outlined in this document in order to provide access to the special needs of people who are in recovery from drugs and alcohol. For example, a facility that meets the definition of Alcohol and Drug Free Community housing as outlined in ORS 90.243 may qualify for funding. No more than 30 percent of the shelter bed capacity in each community is permitted to be subject to required sobriety or drug and alcohol treatment service.

Formal Process

Shelter providers are required to have a written policy outlining the circumstances that would result in a denial to admission to the shelter. The policy should outline the reasons for denial, the process to appeal or review the decision, and circumstances under which an individual or family could receive further assistance. The process must also include a reasonable accommodation request policy to accommodate people with disabilities. At minimum the policy and process should:

- Provide the individual or family with a written copy of eligibility criteria, program rules and expectations, including the termination and grievance policies, prior to the household receiving assistance;
- A process for documentation of steps or actions were taken to avoid the denial, limitation or reduction of benefits such as restorative justice engagement, mediation or similar step;
- Provide written notice to the individual or family outlining the reasons for denial;
- Allow for a review and/or appeal of the decision, including the individual or family an opportunity to present objections to a person other than the person who made the decision;
- Provide written notice (which may be delivered through electronic means, such as text or email) of the final decision to the individual or family;
- Ensure the policy and any notices are available in English and Spanish, at minimum, and consistent with the agency's Limited English Proficiency policy.

Additionally, shelters are required to have written grievance and appeal policy consistent with OHCS policy.



Staff Training

It is important shelters proactively address bias as they could create inequitable access to shelter for certain populations. Shelters should ensure staff are trained in cultural competency, implicit bias, and other racial equity topics to promote and further racial equity within their programs.

Exit/Separation Policies

Emergency shelter is an important piece to an effective homeless service system. However, as communities of color experience higher rates of unsheltered homelessness in some parts of Oregon, shelters must ensure access and services are equitable and do not perpetuate these racial disparities.

OHCS will require Grantees to create exit/termination guidelines that encompass the following principles:

- Use of racial equity lens to ensure termination policies do not disproportionately impact BIPOC and other people from historically underserved communities;
- Cultural responsiveness and trauma informed care when setting program rules and procedures;
- Regular evaluation of shelter exit data to assess for any disparities;
- A process for ensuring documentation of steps or actions were taken to avoid the denial, limitation or reduction of benefits such as restorative justice engagement, mediation, or similar step;
- Clear, documented information on reasons for termination and an appeals process;
- Involuntary exits should occur only as a last resort in the most serious cases to protect the health, safety and respect of shelter participants and staff;

OHCS will continue to engage with shelter operators to ensure future policy requirements are aligned with their practices.

Data and Technical Assistance Subgroup

The “Data and Technical Assistance” Subgroup was directed by Representative Marsh and Matt Tschabold, co-chairs of the Sustainable Shelter Funding Workgroup, to address the following objectives:

- Review existing data collection practices and propose standardized methodologies;



- Identify gaps in current data and recommend strategies for improving data collection and accuracy across the state;
- Provide technical assistance and support for service providers, as well as guidance and resources to other subgroups on data-related issues;

Background and Discussion Topics:

As the subgroup worked through these objectives, the members identified two focus areas for possible changes and recommendations. These focus areas fell broadly into the following groups: data collection/reporting, and technical assistance.

Focus areas concerning **data collection** and **reporting**:

- Housing Management Information System (HMIS) Project Types for Shelter
- Shelter Intake Data Collection Requirements
- Housing Inventory Chart (HIC)
- System Performance Metrics and Outcomes
- Utilization Rates

Focus areas concerning **technical assistance**:

- Incorporating Lived Experience
- Data Collection and Reporting
- Program and Operations

“Data & Technical Assistance” Subgroup Recommendations

The Data and Technical Assistance subgroup identified seven recommendations. These recommendations align with the needs to reduce unnecessary, labor-intensive data collection and reporting; reorient shelters from outputs focused to outcomes focused; incorporate qualitative data and analysis; and provide meaningful training and technical assistance.

1. Incorporate HMIS Shelter Project Type Set Up
2. Adopt Updated Shelter Data Collection Requirements
3. Transition to Biannual HIC Submission Cadence
4. Develop System Performance Metrics and Outcomes Tracking and Evaluation
5. Update Shelter Bed and Unit Utilization Rate Data Collection Process
6. Adopt Qualitative, Narrative information Collection Process
7. Adopt Data and Training and Technical Assistance Specific Funding Pool



Incorporate HMIS Shelter Project Type Set Up

An important aspect of accurate data collection and reporting is to ensure that projects are set up properly in the Homeless Management Information System (HMIS). Currently, all shelter projects are set up as an Emergency Shelter Project in HMIS. This means that all shelters, regardless of their program model and design, collect the same minimum data elements and follow similar reporting.

The Data and Technical Assistance subgroup recommends categorizing shelters into one of two distinct project types:

- **Emergency Shelter** (night-by-night)
- **Transitional Shelter** (entry-exit)

Emergency shelter may be used for some high-volume shelters and where a significant proportion of clients spend a night at the shelter as needed on irregular basis. These shelters often provide a basic, lifesaving space for someone to stay to avoid unsheltered homelessness. Examples of emergency shelter may include mass shelters and severe weather shelters.

Transitional shelter would include more housing focused shelters that provide supportive services to exit clients into permanent housing. The distinction between the two project categories accounts for the different levels of services and functions. As a result, this change would allow for the ability to make meaningful comparative analysis between similar shelter types, delineate statewide inventory between emergency vs transitional shelters, and align with recommended updates for expedited shelter intake data collection requirements. (See next recommendation on shelter data collection.)

Adopt Updated Shelter Data Collection Requirements

Shelters are required to collect minimum data elements at the time of intake. Currently, this process is labor intensive where some programs may require up to 31 data elements. Some regions, particularly rural areas, struggle to maintain consistent data entry, oftentimes contributing to lower data quality and analysis. The required data elements are also misaligned across OHCS funding streams and programs. As such, the Data and Technical Assistance workgroup recommends adopting updated shelter data collection requirements. As shown in the tables below, the workgroup recommends that Emergency Shelters (night-by-night) collect Universal Data Elements (UDEs) and Bed night (14 total data elements), and Transitional Shelters collect UDEs only (13 total data elements).

One data element to note is the subgroup recommends to not include health insurance data element at intake. Given the high demands and limited time at



shelter intake, health insurance information is challenging for shelter providers to obtain in a consistent, reliable manner. This information may not be readily available, and as a result, data quality collected is often poor. The subgroup recommends that emergency shelters not be required to collect this information; transitional shelters would collect health insurance information at a later, secondary point during shelter stays. Health insurance data would also be collected during intake for rehousing programs.

These changes in data collection requirements would expedite shelter intake process, particularly for emergency and seasonal shelters; reduce staff and labor time dedicated to unnecessary data entry requirements; and improve consistent data entry and quality.

Emergency Shelter	Required
Name	X
Social Security Number	X
Date of Birth	X
Race & Ethnicity (Primary & Secondary)	X
Ethnicity	X
Gender	X
Veteran Status	X
Disabling Condition (Y/N)	X
Project Start & Exit Dates	X
Destination	X
Relationship to Head of Household	X
Client Location (Enrollment CoC)	X
Prior Living Situation	X
Bed-Night (Overnight Start/End)	X

Transitional Shelter	Required
Name	X
Social Security Number	X
Date of Birth	X
Race & Ethnicity (Primary & Secondary)	X
Ethnicity	X
Gender	X
Veteran Status	X
Disabling Condition (Y/N)	X
Project Start & Exit Dates	X
Destination	X
Relationship to Head of Household	X
Client Location (Enrollment CoC)	X
Prior Living Situation	X

Transition to Biannual Housing Inventory Count (HIC) Submission Cadence

Housing Inventory Count (HIC) reports provide a snapshot of beds and units available dedicated to serve persons who are homeless. The current OHCS annual HIC cadence inadequately captures interim shelter inventory fluxes. The subgroup discussed the need to increase the frequency of relevant data reporting and inventory updates but also acknowledges the labor-intensive process of updating the HIC more than biannually.



Biannual cadence meets the need for OHCS to have a stronger understanding of current statewide shelter inventory and an opportunity for improved data quality, while also responding to need for increased data relevancy and feedback to mitigate labor intensive processes.

Develop System Performance Metrics and Outcomes Tracking and Evaluation

The Data and Technical Assistance subgroup recommends updating system performance metrics and outcomes.³ The current process focuses on outputs (such as shelter utilization and number of clients served) rather than outcomes. The proposed tracking methods and outcomes are as follows:

- length of stay
- exit destinations
- exit reasons

Tracking length of stay is an important indicator of larger homelessness response system's challenges. Exit destinations and exit reasons demonstrate efficacy of homelessness response system. Requiring exit reason would also considerably improve data quality and allow for more meaningful racial equity evaluation on which populations may be disproportionately exiting shelter and why. The shift toward outcomes allows for stronger analysis in longitudinal evaluations and can help policy makers make more informed answers to the question, "Are we seeing a decrease in unsheltered homelessness?" It also prioritizes solutions and questions of how the homeless service system can achieve goals.

Update Shelter Bed and Unit Utilization Rate Data Collection Process

Shelter bed and utilization information are key metrics for analyzing if homelessness response system is being used properly and to its best ability. It also helps to identify gaps in the system. However, communities have different methods on definitions of shelter types and how utilization is calculated. The subgroup recommends adopting standardized utilization rate data collection process which will increase evaluative accuracy in efficacy of homeless response system.

Adopt Qualitative, Narrative Information Collection Process

The subgroup recommends adopting qualitative, narrative information collection process. This would allow shelters to share with OHCS the unique challenges or

³ <https://files.hudexchange.info/resources/documents/FY24-HMIS-Programming-Specifications-CoC-APR-and-ESG-CAPER.pdf>



information about the shelter that are not available in existing reports like the HIC. Qualitative data can include the number of set-aside beds the shelter may have for the following needs:

- behavioral health
- health
- hospice
- law enforcement
- refugee status

Qualitative data can also include gaps in broader service continuum in regions. Subgroup members shared that shelter operators often provide services outside the scope of their funding and need the ability to convey the issues and the challenges of their region and their work.

Adopt a Specific Funding Pool for Data-Training and Technical Assistance

The subgroup discussed the need for ongoing, dedicated, data-training and technical assistance funding pool related to providing:

- homeless services,
- financial and grant management,
- cohort models of community convenings,
- Housing Management Information System (HMIS) and data quality, and
- other data training and technical assistance (TA) needs.

The subgroup recommends OHCS should be permitted to set aside state resources to fund data training and TA to ensure providers across the state can offer low-barrier access to these services. Additionally, OHCS should develop a comprehensive strategy to ensure TA can be delivered in a variety of ways optimizing OHCS-funded services, including shelter resources.

Specific training and TA needs, collected by all three subgroups, include the following elements:

- incorporating lived experience
- HMIS and reporting
- equity related training, including restorative justice, racial equity lens, cultural competency, and implicit bias
- harm reduction
- trauma informed care
- sustainable shelter handbook
- program operations



Appendix: Implementation Notes on How We Fund

Recommendations from the **How We Fund** subgroup attempted to hit the right “altitude,” creating a framework for funding without being prescriptive or defining technical details. However, as some members of the group noted, for a program to work for providers and clients alike, the “devil is in the details.” Therefore, we are including a letter from Kenny LaPoint, of the Mid-Columbia Community Action Council, with specific reflections on issues that plague the current funding models.

Letter to Representative Marsh, Matt Tschabold and the Sustainable Shelter Work Group,
“How We Fund” Subgroup

November 8th, 2024

EHA/SHAP:

I would prefer to see EHA and SHAP (and ideally ERA, and EHA VET, and EHA DRF....all the other funds included in the State Homeless Funds Program Operations Manual) become one big flexible funding pool rather than differentiating between them and giving us several smaller funding streams we have to braid to get our work done anyway. That would allow for the most flexibility at the local level depending on the needs and help cut down on the number of distinct but similar funding streams we have to navigate administratively. I have mentioned a budget consolidation bill as an avenue to achieve this. I will note that the bifurcated funding streams create huge disadvantages and capacity constraints for smaller rural and/or culturally specific organizations.

It would be great to see a model where funds are distributed in two funding categories (like they do with ORE-DAP): Admin and Program. Then have agencies complete two funding draw downs and reports per year where we must:

- Submit our financials or GL to relevant OHCS program AND fiscal staff at the same time to 1) draw down funds for the past 2 quarters and 2) demonstrate we’re using the funds in allowable ways for both categories.
- Report out on qualitative and/or quantitative outcomes of the work we've done with those funds over the past two quarters both by meeting twice annual HMIS data reporting deadlines, and completing a small narrative reporting template.



- We need the legislature's (or someone's!) help to get OHCS to cut down on the incredible amount of unnecessary red tape and administrative work that currently comes with these funds! The process is currently so unnecessarily complicated and is a hugely unnecessary, bureaucratic burden for our staff because OHCS departments aren't talking to each other or coming up with more streamlined processes to administer these funds. Process currently includes:
 - Tell OHCS if we want to accept our portion of the formula funding allocation available to us each biennium/year or not.
 - Review program manuals that are dozens of pages long (though I think OHCS recently published a 10-page cheat sheet which is at least a little more helpful) to decide how much funding we want in each distinct funding category for each distinct funding stream, ranging from data to acquisition/rehab to financial assistance to program delivery to shelter operations to admin, etc.
 - Fill out and submit IRs for each individual funding stream detailing what amount of funding we want in each funding category and whether we plan to use a standard or time-bound expenditure approach
 - Spend time answering a lot of questions from OHCS about if we have actually put various activities/priorities in the right funding streams and/or categories based on what's allowed for those funding streams and categories (and telling them more about if we have particular outcomes we're aiming for in terms of number of households served, even though EHA/SHAP's/ERA's program manual currently allows us to use those funds to support/supplement other programmatic work rather than having to be tied to serving a specific number of distinct households),
 - Wait for OHCS to then upload the funds into the NOA once they have approved our IR. Another disadvantage to small agencies as front loading funding is difficult without cash flow.
 - Submit budget change requests and then having OHCS process those/reflect those in the NOA if we want to move funds from one category to another partway through the year. The change process can take a significant amount of time for OHCS staff to approve.
 - Submit separate HMIS reports on a different cadence for these funds and other funds we're blending to support our shelter/housing work



- Serve on committees where OHCS is asking us for help improving their program manuals because they keep hearing from us that they're making the programs too complicated to administer
- Have our staff spend additional time making condensed 2-3 page "cheat sheets" to make it easier for our fiscal team and program managers/frontline staff to easily engage with/use these funds even though on an economies of scale basis it would be ideal if OHCS just generated something like this for the whole state in the first place...
- Have our finance team submit at least quarterly requests for funds (RFFS) to OHCS's fiscal department based on what we've spent, entirely separate from the program side reporting process, and with mushy guidance around what kind of financial back-up documentation we're supposed to submit when we submit an RFF which means we have to do more work down the road like during monitoring if there are questions about exactly what those RFFS represented
- Fill out an annual report to say what we accomplished with the funds. I will note that some of the funds we get via formula from the State Homeless Funds bucket are small enough portions that the admin burden of making sure we're using them according to the slightly different yet similar guidelines given to us almost outweighs the benefit of getting the funds in the first place. For instance our agency receives about \$10k in ERA funds per year, a small portion of which is admin. That's enough to help maybe 1, 2 households.

Other issues of note:

Contracts:

The number of contracts and contract changes we receive annually is very large. They each need executive review and legal review. This takes a ton of time and money.

Insurance:

Every time a new contract is signed or changed we must, again, provide evidence of insurance and often the insurance requirements change. We then need to request for OHCS to provide an exception to the requirement or we have to have our insurance company update our policy. This occurs many times annually. Additionally, insurers are really questioning whether they want to be in this business. MCCAC has been non-renewed twice in the last 24 months and has had to seek out a new insurer. Options are very limited and costs have increased a ton. We recently saw a 150% increase in insurance costs. I will note that we have not had a single claim.

Burnout:

Staff, many of whom have lived experience, are becoming burnt out on the increasing administrative work (data entry, file maintenance, etc.). They do this work to connect with people and use their lived experience as a tool to show clients that there is hope. The administrative burdens are taking the heart out of the work and that results in burnout. This is not why our staff are in this business.

The Heart (client story):

Just the other day I was doing room inspections at The Annex, MCCAC's Project Turnkey site and was speaking with one of the guests, let's call her Jenny, who currently has stage 4 liver disease. Her condition is terminal. She was in tears because of fear as she faces death, likely in the near future. I ended up spending about 30 minutes with the client, holding her hand and telling her that love is surrounding her in this place. After sitting with her I went back into the Annex office where I spoke with her case manager who was neck deep in administrative paperwork. I have to say that I felt significant anger that my team is spending time doing paperwork rather than sitting next to Jenny and caring for her. Jenny needs love now more than ever. Love that will bring her solace in the face of fear. This is the difficult work that my team should be focused on.

For me, this says that we have lost our way as we have created a system that is sucking the heart out of the people who have dedicated their lives to the work. The humanity of the work is starting to get lost in administrative confusion. I am sure I sound like a broken record but that record refuses to stop playing. I believe that we can create change and instill hope in people. But it takes us to see that this work is centered in heart and remove the barriers that exist in accessing the heart.

Thank you for reading and considering my words. Happy to have further conversations, as needed.

Best Regards,

Kenny LaPoint

Executive Director, Mid-Columbia Community Action Council



National Alliance to
END HOMELESSNESS

INTERIM STRATEGIES *for* RESPONDING TO UNSHELTERED HOMELESSNESS

TOPLINE MESSAGES

- **Permanent housing strategies remain both an immediate and the sole long-term solution to homelessness.** Whenever possible, people should be connected directly to housing from wherever they are currently residing.
- Interim strategies (i.e., temporary solutions offered as communities scale permanent housing options and accompanying services) should be **grounded in evidence-based practices, such as low-barrier and housing-focused approaches** to providing immediate access to safer places to sleep while service and health needs are addressed.
- **No interim strategy should be coercive.** A choice to forgo an offer of temporary, safe accommodation should not come at the risk of citations or arrests, nor should it jeopardize access to long-term housing and services.

BACKGROUND: THE RISE OF UNSHELTERED HOMELESSNESS

In recent years, communities across the United States—including urban, suburban, and rural places—have seen a rapid and alarming rise in unsheltered homelessness, with more people sleeping in public spaces. This is the result of a nationwide lack of investment in affordable housing, stagnant incomes, an inadequate healthcare system, a criminal legal system that punishes too many and limits opportunity upon release, and a long history of racism and other forms of discrimination baked into our systems and society. These challenges—which have long manifested in visible homelessness in large, urban coastal communities—are increasing in every region of the country and in every type of community.

These sharp increases in the number of people sleeping unsheltered in public spaces brings greater visibility and heightened attention from community members and lawmakers. This increased attention can bring pressure on local and state lawmakers to focus on this critical issue. While this pressure can create momentum and opportunity to advance evidence-based solutions to address homelessness, it can also lead to local and state lawmakers seeking out strategies that can swiftly make homelessness less visible such as evicting encampments and passing enforcing laws and ordinances that fine, cite, arrest, and jail people experiencing homelessness. But [these efforts are short-sighted](#), leaving the most vulnerable households at even higher risk and often only making homelessness worse.

MEETING BOTH SHORT-TERM AND LONG-TERM NEEDS

The only permanent solution to ending homelessness is housing that is affordable, and which is paired with accessible, culturally appropriate, voluntary healthcare and supportive services. Communities can consider [a range of options](#) to increase housing opportunities, promote public and community health, and advance racial equity. However, the severe shortage of affordable housing, inadequate safety net, and other systemic challenges that result in homelessness are problems that cannot be solved overnight: the tools to create deeply affordable housing quickly are rarely at the disposal of local leaders.

Recognizing that these challenges cannot be solved quickly and unilaterally, the Alliance acknowledges that communities typically cannot access the full scope of housing and resources needed to address homelessness in their area. Permanent housing is the ultimate solution to homelessness, but a community’s lack of affordable housing and shelter leaves a gap in how they can most effectively serve people experiencing unsheltered homelessness in a dignified manner. While communities strive towards providing permanent housing for all who need it, they are still faced with serving the existing unsheltered population, prompting the question: “What do we do in the meantime?”

The strategies in this document represent explanation, not endorsement, of how communities might respond in these situations. Many may create temporary structures and spaces to offer temporary programming and spaces that can be used “in-the-meantime” to be responsive to public pressure, while also prioritizing the safety, autonomy, and health of people experiencing unsheltered homelessness as permanent housing is being secured.



Examples of these structures and spaces to create safe and temporary places for people to reside include:

- **Non-congregate shelter** that temporarily leases motel/hotel space or repurposed space from other non-residential buildings;
- **Safe Parking** sites which provide a safe, fixed location for people to park vehicles overnight in locally sanctioned spaces;
- **Tiny Homes** which provide nonpermanent accommodation in small, private units;
- Large tents or tent-like structures which can be erected quickly to provide a covered sleeping area; or
- **Self-governed supported encampments** which provide residents with the resources and infrastructure, such as mobile bathrooms, to stabilize in place.



Investing in any of these interim strategies should only happen in conjunction with continued efforts to expand permanent housing options and increase access to healthcare and services that people may want and need. Interim strategies do not solve homelessness but instead are intended to create temporary alternative options where people can safely choose to reside while on their path back to housing. This document seeks to provide guidance on universal standards and criteria for operations, design, and implementation that should always be accounted for when adopting and investing in any of these strategies.

The Alliance **does not endorse or in any way support** approaches that are not human-centered and which restrict individual choice and autonomy, such as models for:

Sanctioned Encampments. A specified location that is established as the only place where people can safely reside in tents (or other temporary structures) without the threat of law enforcement action. In essence, people are forced to go to these locations—which also are high-barrier—or otherwise, face arrest, fees/fines, or other punitive actions.

Transformation Centers. A model which focuses on rewarding ‘positive’ behaviors and giving out consequences for ‘negative’ behaviors (e.g., by creating varying levels of comfort or privilege within a facility and punishing bad behavior by demoting participants to a less comfortable or safe sleeping area).

CONSIDERATIONS FOR INTERIM STRATEGIES

Although the Alliance does not endorse any of the specific types of strategies discussed in this guidance, it supports the below overarching principles and standards which can guide community-decision-making.

Fundamental System Principles

The following principles should be at the forefront of any planning discussions, and should be considered before implementing any temporary strategy on unsheltered homelessness:

Treat Strategies as Temporary

- “Interim strategies” identified in this document should be designed with a clear understanding that they are intended to create temporary capacity within the community. These strategies should aim to create safe locations for people experiencing unsheltered homelessness while permanent solutions are expanded.
- Communities should include a sunset plan in the planning and design process on the front end so that the community recognizes this site as temporary, but that ultimately the need for such sites will decrease as housing opportunities are increased.

Take Inventory of Current Resources

Before considering investment in any of the strategies discussed herein, communities should first account for existing resources including funding, workforce capacity, land, and property. Communities should assess whether current resources are being maximized and should use homeless system data to determine what system capacity is actually needed. In resource-constrained environments, there are always tradeoffs. However, investing these types of interim strategies should only be considered when the community has maximized other resources and is also incorporating other housing-focused tactics throughout their system, including:

- Integrating **housing problem-solving** into every part of the homelessness response system, including the coordinated entry process, to help those with fewer barriers and less acute health needs avoid homelessness altogether or exit homelessness as quickly as possible with only light touch assistance;
- Implementing **direct-to-housing efforts** whenever possible to move people who are in unsheltered locations such as encampments directly into housing, including through investing in housing-focused street outreach; and
- **Removing barriers** from existing emergency shelters that may otherwise be keeping people from accessing resources.

Communities should carefully evaluate emergency shelter rules and remove rules that make it difficult to access or remain in emergency shelter.

Communities should survey shelter staff and residents, as well as people experiencing unsheltered homelessness, to **better understand the formal and informal rules and practices** that could be affecting decisions about access to emergency shelter and services.



**COMMON
BARRIERS
THAT
SHELTERS
SHOULD
REMOVE**

Restrictive household configuration requirements

Unreasonable restrictions on personal time and space.

Rules that prohibit pets

Charging fees to access resources

Identification and documentation requirements

Inconvenient or inaccessible emergency shelter locations

Unclean, unsafe, or overcrowded conditions within shelter

Lack of personal space and/or access to sufficient and secure storage for personal belongings

Limited access to emergency shelter during certain times of day (i.e., curfews)

Strict adherence to sobriety and required participation in sobriety activities

Unflexible “good behavior” and/or cooperation with emergency shelter rules

Restrictive income or criminal background screenings

Consult with Partners Inclusively and Strategically

- Directly involve people with current and prior experience of unsheltered homelessness in the planning and design process of these interim solutions. The [inclusion of people with lived experience](#) helps to ensure that these solutions actually meet the needs and preferences of the community for which they are intended.
- To the extent that the community seeks to hire a consultant to assist in the planning and design process, there should be a competitive process to ensure that there is no financial gain related to any particular type of model, material, product, etc.

Integrate Efforts within the Continuum of Care Structure

- Participation in the [Continuum of Care](#) (CoC)’s coordinated entry system should be expected so that, at a minimum, anyone that is supported through this type of programming should have access to the CoC’s coordinated entry process for assessment and referral to any resources they may be eligible for within the CoC, particularly for permanent housing. CoCs should ensure their coordinated entry policies are up to date and clearly define how these temporary strategies will be incorporated.
- Participation in the CoC’s [Homeless Management Information System](#) (HMIS) and following of local HMIS policies regarding data quality and privacy to ensure greater levels of care coordination throughout the CoC.

Design Thoughtfully

Ensure that residents will be able to maintain community connections, employment, access to services, and more. Utilize the Alliance’s [Five Keys to Effective Emergency Shelter](#) as a starting point for developing an implementation plan, as the same overarching principles should apply across temporary interventions.

Universal Design Principles

Considerations for Space and Safety

- **Accessibility.** Must be accessible to all those experiencing unsheltered homelessness, regardless of disability, gender, or language. For example, ramps and other assistive devices must be available to accommodate a broad range of needs throughout the physical space. Staff and/or assistive devices should be available to ensure that people who don't speak English as a first language can access services.
- **Security and Safety.** Provide a reasonable expectation of safety, including for those people fleeing abuse, human trafficking, and stalking. [Safety practices](#) extend from operational and administration rules to physical spaces, staff training, and trust building. Safety considerations should also include relief from environmental threats such as extreme heat, excessive rain, or flooding.
- **Personal Space.** Offer sufficient space to prevent overcrowding, and infringement on personal space (to allow for privacy), as well as to prevent the spread of communicable diseases. In sites such as tiny homes or non-congregate shelter, sharing space should only be offered as a choice and not a requirement.
- **Adequate and Secure Storage.** Offer secure storage spaces for personal belongings and property. Residents must have unlimited access to their belongings. If need be, communities may provide storage just outside the site for critical belongings that are not allowed on-site (e.g., a resident who is employed as a security guard may require storage for a licensed weapon). To ensure the safety of people fleeing domestic violence, stalking, and harassment, each person should also have a deidentification code that connects the items stored to the owner.
- **Pets.** Maintain a low-barrier orientation and allow individuals to [bring and keep their pets on site](#). Pets provide an irreplaceable form of companionship and sites that fail to support people's pets are unlikely to be an attractive (or even viable) interim option for unsheltered individuals. If necessary, sites should provide options for kenneling pets, offering veterinary care drop-ins, etc.
- **Households.** Must be able to accommodate [households](#) as they present regardless of familial status, marriage, and/or the gender identities of household members.



Considerations for Health and Wellness

- **Sanitation.** Communities must maintain sanitation through providing supplies and equipment for cleaning personal and communal spaces, as well as for proper waste disposal. Communities must also ensure regular garbage removal from site and regular cleaning and sanitizing of restroom facilities.
- **Bathroom Access.** Must ensure 24/7 access to clean restrooms and showers, situated closely to participants and which maintain privacy and adequately meet the needs of all, particularly people living with disabilities.
- **Water and Food Supply.** Must ensure access to clean water and common eating areas. Protocols need to be in place to ensure food and water is free from contamination.
- **Proper Medication Storage.** When necessitated, communities must ensure access to refrigeration for required medication that is needed for a resident or their pet.
- **Overdose Prevention.** All staff, residents, and volunteers should be trained in overdose prevention strategies, including the use of Naloxone (also known as Narcan). Naloxone should be distributed to participants. Ensure access to sharps containers to safely discard needles. Staff and residents should conduct routine wellness checks (not inspections) to quickly identify and respond to potential overdoses.
- **Thermal Environment and Air Quality.** In indoor settings, every space and unit should be equipped with cooling or heating elements to ensure the comfort and safety of participants. In open-air facilities, alternative arrangements must be made available during extreme weather, such as heavy rain or extreme heat, as well as during emergencies such as fires, to protect the safety and health of participants.

Considerations for Program Design Elements

- **Immediate and Low Barrier Access.** Must ensure immediate and easy optional participation by removing barriers to entry and access to resources, such as requiring identification or documenting need. Any programming should be culturally appropriate* and accessible to those whose first language is not English. Communities should limit requirements related to sobriety or treatment as a pre-condition to program entry, as these barriers are shown to impede progress and prolong time to get housed. It is reasonable, however, to require residents to agree to respect the personal space and property of other residents.
- **Housing-Focused Strategies.** The goal for every resident is permanent housing. Whenever possible, people should be connected directly to housing from wherever they are currently residing. However, when housing is not immediately available, these accommodations may be offered as a temporary place for people to choose to reside while pursuing permanent housing.

* **Culturally Appropriate Programming and Policy** respond to the cultural and linguistic needs of the community being served as defined by the community and demonstrated through needs assessment activities, capacity development efforts, policy, strategy and prevention practice implementation, program implementation, evaluation, quality improvement and sustainability activities.

- **Staffing and Case Management.** Outreach and program staff, including housing navigators and peer supports, should routinely engage residents to address a broad range of needs. To the maximum extent possible, some form of onsite staff support should be available 24/7. Communities should offer connections to community-based health-care, treatment, and other voluntary supportive services and provide onsite whenever possible. At a minimum, every resident should be engaged with case management staff to work on a housing plan that will allow them to access housing options as quickly as possible, depending upon housing availability and personal autonomy and choice.
- **Substance Use Considerations.** People with substance use disorders have different needs at different times. While some people may be in active use, necessitating the availability of harm reduction interventions, others may be in recovery, choosing sobriety or abstinence. Understanding and respecting individual journeys is important to ensure that people are supported where they are and given access to the resources they need when they need them. Onsite substance use treatment services can help provide initial support. Permanent housing remains the foundation from which people can most stably access and benefit from these types of services.
- **Data to Measure Performance.** Collecting data is important to know who is using specific services, their effectiveness, and if any resources need to be shifted and allocated towards different needs. At a minimum, track outcomes by measuring data on percentage of exits to housing, average length of stay, and returns to homelessness to evaluate the effectiveness of the temporary structures and improve outcomes.
- **Strategies for Subpopulations.** Consider the unique needs and experiences of different subpopulations accessing temporary accommodation in your community (i.e., older adults, LGBTQ people, veterans, people whose first language is not English, etc.). For example, onsite behavioral health supports can be critical for people living with a severe mental illness, but certain interim strategies may not be appropriate settings to meet these needs. Furthermore, implementing policies such as de-identifying stored personal possessions through anonymous codes can help maintain the safety of people fleeing domestic violence, trafficking, or stalking.
- **Geographically Accessible Sites.** Should be located in the most geographically accessible and strategic areas as possible, where participants can readily access transportation options and services, as well as necessities such as grocery stores or health care clinics/hospitals. In rural communities where options may be more limited, planning should explicitly include how the programming will ensure participants have access to transportation and community resources. Avoid locations which may expose and threaten participants to environmental hazards, including but not limited to air pollution, toxic waste, and/or heat islands.

CONCLUSION

When considering investing in one of the interim strategies discussed in this guidance, it is important to remember that these strategies should never be viewed as a permanent solution to reducing homelessness in the community. In fact, people residing in these sites are still considered, by definition, to be experiencing homelessness for the duration of their stay. These strategies are not a substitute for moving unsheltered persons directly into permanent housing and should only be considered as a way to create healthier and safer spaces for people to reside temporarily until their permanent housing is secured.