Housing Stabilization Program (HSP)
July 1, 2025

Housing Stabilization Program Operations Manual

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NOTE: If a statute, rule, contract or guidance does not expressly prohibit an activity or expense, it does not mean that the activity or expense is allowable. Statutes, rules, contracts and guidance are meant to express how funds are intended to be used.

Contact OHCS for prior approval before using any OHCS funds for an activity or expense if it is not addressed in statute, rule, contract or guidance. Failure to do so may result in the disallowance of an activity or expense and may result in remedies afforded in contract. It is an incorrect assumption to believe that because language does not say you cannot do something, that it must mean you can. OHCS provides guidance around what is disallowed from frequently asked questions; however, this does not mean to encompass everything that is disallowed.

Contact OHCS for any questions on how to expend OHCS funds if what you want to do is not covered by statute, rule, contract or guidance prior to the use of funds

NOTE: Guidance in this manual is specific to the program identified in this manual. Unless specifically stated, any other guidance from other manuals produced by OHCS does not apply to this program and are not comparable or transferable.

1. Program Summary

The strategic delivery of the Housing Stabilization Program (HSP) can:

- Quickly identify and engage people at risk of and experiencing houselessness while including data sharing strategies that are aimed to improve service delivery and coordination at the ground level;
- Prevent people from losing their housing and divert people from entering the homelessness service system;
- Provide people with immediate access to services while prioritizing interventions that are aligned with a Housing First model to connect people with permanent and individualized housing solutions that include robust wrap-around services; and
- Quickly connect people experiencing houselessness to housing assistance and services tailored to their unique needs and strengths to help them achieve and maintain stable housing.

HSP provides temporary financial assistance and support services to stabilize the housing of TANF recipients who are houseless or unstably housed. For the purpose of HSP and throughout this manual, TANF recipient also refers to a TANF-eligible recipient as determined by ODHS through the Interagency HSP Referral Form (this is not an eligibility factor that is determined at the subgrantee/subrecipient level, but is determined by ODHS through the use of the Referral Form).

U.S. Department of Health and Human Services, Temporary Assistance for Needy Families (TANF) federal funds are provided for one of the following four purposes:

a) assisting needy families, so that children can be cared for in their own homes;

b) reducing the dependency of needy parents by promoting job preparation, work and marriage;
c) preventing out-of-wedlock pregnancies; and
d) encouraging the formation and maintenance of two-parent families.

Pursuant to 45 CFR 260.31 and through an Interagency Agreement with Oregon Department of Human Services (ODHS), the Housing Stabilization Program assists the TANF program meet its specific purpose of assisting eligible needy families so that children can be cared for in their own homes, with non-recurrent, short-term benefits that:

- Deal with a specific crisis situation or episode of need; AND
- Are not intended to meet recurrent or ongoing needs; AND
- Will not extend beyond 120 days from the date of the first HSP assistance payment.

HSP requires subgrantees to identify and match grant funds with TANF Maintenance of Effort (MOE) funds in an amount identified in the funding application for each subgrantee to meet. TANF MOE funds must not originate with the federal government and are not expended as a condition of receiving federal funds under another program. See more information regarding MOE in this manual.

Appendices are included in this manual for common definitions and acronyms, as well as rules and regulations associated with the program.

2. General Program Requirements

(A) *Program Standards*

Subgrantee/subrecipients **must** adhere to all program standards as identified in the Homeless Services Section (HSS) Program Standards Guidance. **Failure to adhere to HSS Program Standards will result in audit findings and may put subgrantee/subrecipient funding at risk**. The HSS Program Standards Guidance includes requirements related to policies and procedures, along with general requirements for financial management of HSS grants, data requirements and records requirements. HSS Program Standards apply to HSP and align across HSS programs. It is **critical** that subgrantee/subrecipients understand their responsibilities in ensuring that they are following all program and funding requirements. Inclusion of the HSS Program Standards Guidance ensures that subgrantees/subrecipients and OHCS has a central location for the consistency of program standards across multiple programs. Find the HSS Program Standards Guidance on the HSS Dashboard or OHCS website.

(B) *Release of Information*

Personally identifiable information is protected by federal laws (Privacy Act of 1974, as amended) and will be collected for the purpose of determining program eligibility, providing assistance/service, data collection, reporting and monitoring. Personally identifiable information will be shared with Oregon Housing and Community Services as is necessary to carry out the intent of an assistance or service program for the benefit of the person applying for such assistance or service and will be disclosed to Oregon Housing and Community Services without written authorization.

As personally identifiable information will also be shared with Oregon Department of Human Services, and may include Oregon Department of Veterans Affairs and Oregon Health Authority as part of the information sharing agreement with OHCS for administering programs with the same or similar clients or populations, participants must sign a Release of Information; however, refusal to sign such authorization cannot be the basis for denying program services to otherwise eligible participants. Participant refusal to sign a Release of Information does not negate the inclusion of personally identifiable in secure reporting to Oregon Housing and Community Services. Oregon Housing and Community Services will de-identify participant demographic data for the purposes of reporting.

Subgrantees and their subrecipients are required to have a signed agency Release of Information form for each adult member of the identified household authorizing the release of information pertinent to determining program eligibility, providing assistance/service and other relevant need for sharing information. Each adult member must complete and sign their own ROI privately and ROIs cannot be shared with other household members. Unaccompanied youth who are the head of household must also have a signed Release of Information form on file. Release forms must be time-limited, with at least a three-year period to cover the period of monitoring requirements, and specific as to with whom and what information will be shared.

The Oregon Housing and Community Services and Oregon Department of Human Services, are required to be listed as entities with which participant information will be shared as it pertains to data collection and monitoring (including third-party audits and reviews), although this requirement can mean they are both listed on the same form or subgrantee/subrecipient can use separate forms for this purpose.

In addition, any Release of Information form for the purpose of releasing information to OHCS and ODHS <u>must</u> include the option of alternative formats including native languages, Braille, large print, computer disk and oral presentation. The MSC3010 form from ODHS meets this obligation. The form can be found on the ODHS website.

Participant refusal to sign a Release of Information must be documented, dated, and kept in the participant file. Participant refusal to sign such authorization **<u>cannot</u>** be the basis for denying program services to otherwise eligible participants.

3. Additional HSP Requirements

(A) *TANF Collaboration*

Communication between ODHS staff and subgrantees/subrecipients administering HSP is fundamental and a priority to maximizing housing-related assistance for families in a more holistic approach while avoiding duplication of benefits or services.

Collaboration with ODHS case managers is required for the period of time in which HSP funds are available for expenditure. Subgrantees/subrecipients must track all participants served with HSP funds, including all ODHS referrals related to HSP funding and coordinate with their local ODHS district to write and sign a collaboration plan that is submitted through the subgrantee's grant agreement/contract Funding Application.

Subgrantee/subrecipients **must** use the Interagency HSP Referral Form to facilitate referrals to and from ODHS. The Interagency HSP Referral Form can be found on the HSS dashboard at: https://app.smartsheet.com/b/publish?EQBCT=8a215621578a4f76ae98113d719d5e64. Only referral forms that are fully completed, in their entirety, meet the requirement for eligibility and eligibility documentation. If a referral form is not fully completed, the subgrantee/subrecipient must ensure that eligibility documentation is received from the client and/or ODHS.

Subgrantees must securely send to their local district office or share in co-case planning meetings with their local district office, the HSP Referral Tracking and Quarterly Provider Report (tracking sheet) at a frequency identified in the Collaboration Plan and must use the template, in form and format, provided by OHCS. If any modifications to the template tracking sheet are desired, they must be prior approved by OHCS **before use**.

OHCS makes available a Collaboration Plan template to subgrantees that **must be used** as part of the subgrantee's grant agreement/contract Funding Application. The Collaboration Plan template may be found on the HSS Dashboard. All subrecipients of a subgrantee's must adhere to the Collaboration Plan approved by OHCS.

Collaboration Plans:

- Must be submitted and approved by OHCS through the subgrantee's grant agreement/contract Funding Application;
- Must be developed in cooperation with Subgrantee and local ODHS District staff and must be signed and approved by both entities and must include the identification of any subrecipients, if subgrantee further contracts the delivery of HSP funds to subrecipients;
- Must include names, email addresses, and phone numbers of Subgrantee (and subrecipients, if applicable) and ODHS personnel responsible for the development and delivery of the collaboration plan. This can be multiple people; however, the main point of contact for communication with OHCS must be identified for all entities;
- Must describe how the subgrantee/subrecipient will work with their local ODHS branch(es) to co-case manage clients;
- Must describe how the subgrantee/subrecipient will communicate their TANF participant list and/or referral tracking sheet to their local ODHS branch(es);
- Must describe the frequency of communication, which must occur at a monthly minimum while subgrantees/subrecipients have HSP funding available; and

- Must describe the method of communication between the subgrantee/subrecipient and their local ODHS branch(es) (include details for specificity, such as dates/times of meetings, how they occur either phone/zoom or in-person, who is responsible for scheduling, and what information will be shared).

Collaboration Plans must include information on Referrals as identified below:

REFERRALS:

- Must describe the referral process (include details for specificity, such as how are referrals sent, how is contact made with client and are there expectations of the participant for response);
- Must describe the timelines for how quickly the subgrantee/subrecipient and local branch(es) will respond to referrals;
- Must describe how actions taken on referrals will be communicated between the subgrantee/subrecipient and the local ODHS branch(es);
- Must describe how the subgrantee/subrecipient will address a crisis need if the frequency of working with their local branch(es) is later than the time needed to address the client's situation; and
- Must include a plan when/if the number of referrals exceed the subgrantee's/subrecipient's capacity to take action on the referrals.

Collaboration Plans must include information on Transportation as identified below:

TRANSPORTATION:

- Must describe how the subgrantee/subrecipient will address serving clients with transportation issues, if clients are unable to access the subgrantee's/subrecipient's physical location; and
- Must describe how such transportation options are communicated to clients.

(B) *Case Files*

Documentation of participant eligibility and services received must be maintained in printed form or electronically saved and with participant case files. Electronically saved documents must be provided to OHCS in paper format when requested by OHCS. Files for applicants found to be ineligible for assistance or for participants who are no longer eligible to receive assistance documentation must include why they are ineligible and how that was determined and how the applicant/participant was notified of their ineligibility and their grievance rights and such evidence must be in the case file. File documentation will be the basis of OHCS monitoring to ensure subgrantee and subrecipient comply with program requirements and regulations.

(C) *Client Service or Housing Stability Plan*

Case management is one of the primary services offered to individuals and families who face multiple challenges, including severe mental illness, addiction, and houselessness. Effective case management includes **assessment, planning, implementation, coordination, and evaluation**. Best practices in case management skills are available on the OHCS Homeless Services Section dashboard.

A Client Service/Housing Stability Plan **is** needed when:

1) A client is receiving more than one-time only services;
2) Required by the program based on the type of assistance or services provided to the client;
3) A subgrantee/subrecipient is unable to assist a client with the entirety of their funding request. For example, a client owes six months of rent arrears and the subgrantee/subrecipient is only able to cover three months of that arrears. A plan would be needed to determine how the client will be able to avoid eviction and remain housed so that the three months of assistance covered by OHCS funds is not just a debt payment. Minimally, the client stability plan in this case, should document referrals, such as budgeting classes, housing navigation, long-term rental assistance programs, SOAR, assistance in obtaining other needed services, etc., and the subgrantee/subrecipient's best effort to assist the client in understanding how they can stabilize their situation.
4) Plans are required to be client driven, using input and goal setting by the client. An existing and active client service/housing stability plan from other providers, such as ODHS, can be shared and amended for purposes of OHCS-funded programs. Subgrantees and subrecipients can request copies of assessments and case plans from ODHS for TANF recipients.
5) Client Service or Housing Stability plans can include a specific, simplified assessment related to housing barriers. A Barriers to Housing Stability Assessment/Plan is available in the sample forms located on the OHCS website.

(D) *Criminal Records Check*

Subgrantee, subrecipient agencies and subrecipient organization's subrecipients must verify that any employee working with HSP households do not have a conviction of child abuse, offenses against persons, sexual offenses, child neglect, or other offense bearing a substantial relation to the qualifications, functions or duties of an employee scheduled to work with HSP households. There must be documentation on file that includes records of criminal records checks for monitoring purposes.

"Criminal records check" means obtaining and reviewing criminal records and includes any or all of the following for the state of Oregon:

(1) Obtain an Oregon criminal records check from Oregon State Police (OSP) using the Law Enforcement Data System (LEDS). The Oregon criminal records check may also include a review of other criminal information [https://www.oregon.gov/osp/programs/cjis/pages/cch.aspx];

(2) Request a national criminal records check where criminal records are obtained from the Federal Bureau of Investigation (FBI) through the use of fingerprint cards and other identifying information sent to OSP; or

(3) Obtain a state-specific criminal record check from law enforcement agencies, courts, or other criminal records information resources located in, or regarding, a state or jurisdiction inside and/or outside Oregon.

4. Applicant Eligibility

(A) *Household Composition*

Categorical Eligibility: When the eligibility group is receiving TANF (EBT cash benefits, not EBT SNAP benefits), then the eligibility group is categorically eligible to receive HSP, without meeting any other financial or non-financial eligibility criteria. Households must still meet the housing status requirements; however, in cases where there is a written referral from ODHS indicating housing status, no further documentation is required. Confirmation of TANF status must be confirmed, in writing, with the local ODHS branch.

(B) *Housing Status*

The eligibility group **must** meet one of the following categorical definitions of homeless or at risk of becoming homeless. In cases where there is a written referral from ODHS indicating housing status, no further documentation is required.

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

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

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

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

Category 3: Homeless Under Other Federal Statutes—unaccompanied youth under 25 years of age, or families with children and youth who do not otherwise qualify as homeless, but who:

- Are defined as homeless under Section 387 of the Runaway and Homeless Youth Act (42 U.S.C. 5732a), section 637 of the Head Start Act (42 U.S.C. 9832), section 41403 of the Violence Against Women Act of 1994 (42 U.S.C. 14043e-2), section 330(h) of the Public Health Service Act (42 U.S.C. 254b(h)), section 3 of the Food and Nutrition Act of 2008 (7 U.S.C. 2012), section 17(b) of the Child Nutrition Act of 1966 (42 U.S.C. 1786(b)) or section 725 of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11434a); **AND**
- Have not had a lease, ownership interest, or occupancy agreement in permanent housing at any time during the 60 days preceding the date of application for homeless assistance; **AND**
- Have experienced persistent instability as measured by two moves or more during the 60 days period immediately preceding the date of applying for homeless assistance; **AND**
- Can be expected to continue in such status for an extended period of time because of chronic disabilities; chronic physical health or mental health conditions; substance addiction; histories of domestic violence or childhood abuse (including neglect); the presence of a child or youth with a disability; or two or more barriers to employment, which include the lack of a high school degree or General Education Development (GED), illiteracy, low English proficiency, a history of incarceration or detention for criminal activity, and a history of unstable employment;.

Category 4: Fleeing/Attempting to Flee Domestic Violence—household who:

- Is fleeing, or is attempting to flee, domestic violence, dating violence, sexual assault, stalking, or other dangerous or life-threatening conditions that relate to violence against the individual or a family member, including a child, that has either taken place within the individual's or family's primary nighttime residence or has made the individual or family afraid to return to their primary nighttime residence; **AND**
- Has no other residence; **AND**
- Lacks the resources or support networks, e.g., family, friends, and faith-based or other social networks, to obtain other permanent housing.

Category 5: Unstably Housed—household who:

- Is rent-burdened, defined as paying more than 30% of their gross income in rent (documented income/rent amount); **OR**
- Is currently paying more than the Fair Market Rent, defined by HOME FMRs (https://www.oregon.gov/ohcs/compliance-monitoring/Pages/rent-income-limits.aspx) or Small Area FMRs, as applicable (with documented income/rent amount); **OR**
- Is at risk of losing their housing, and does not otherwise qualify as homeless or imminent risk under the above listed (1-4) categories, provided that:
    - They have been notified to vacate current residence or otherwise demonstrate high risk of losing current housing (rationale for high risk of losing current housing must be documented and kept in the client file); **AND**

- Lack the resources or support networks to obtain other permanent housing (must be evidenced by documentation in the client file).

(C) *Income*

A household is categorically eligible to receive HSP funds when they are receiving TANF. All households served with HSP must be TANF recipients. Subgrantee must verify that a household is a TANF recipient, which can be accomplished through the Interagency HSP Referral Form.

Income limits for HSP is at or below 185% of the Federal Poverty Guidelines; however, the Interagency HSP Referral Form when fully completed serves as documentation of income eligibility.

(D) *Resource Limitation*

A household is categorically eligible to receive HSP funds when they are receiving TANF. All households served with HSP must be TANF recipients. Subgrantee must verify that a household is a TANF recipient, which can be accomplished through the Interagency HSP Referral Form.

Resource limitation (i.e., assets) requires that households have less than $10,000 in available resources; however, the Interagency HSP Referral Form when fully completed serves as documentation of resource limitation eligibility.

(E) *Citizenship*

A household is categorically eligible to receive HSP funds when they are receiving TANF. All households served with HSP must be TANF recipients. Subgrantee must verify that a household is a TANF recipient, which can be accomplished through the Interagency HSP Referral Form.

HSP requires that households receiving HSP funding must be a citizen or have qualified non-citizen status; however, the Interagency HSP Referral Form when fully completed serves as documentation of citizenship eligibility.

(F) *Oregon Residency*

A household is categorically eligible to receive HSP funds when they are receiving TANF. All households served with HSP must be TANF recipients. Subgrantee must verify that a household is a TANF recipient, which can be accomplished through the Interagency HSP Referral Form.

To receive HSP assistance, households must be a resident of Oregon; however, the Interagency HSP Referral Form when fully completed serves as documentation of Oregon residency eligibility. Assistance may be issued to help a household return to a former state of residence when there is documentation in the client's service/housing plan that documents the previous resident state; or

(1) If the household, as victims of domestic violence, needs to flee from their current housing situation.

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

5. Eligibility Documentation

(1) Documentation of all participant/applicant eligibility information must be available in participant/applicant files or if kept electronically, available upon request in the format requested. Documentation of all efforts to obtain higher preference of verification (Third-party and Intake Worker/Case Manager Observation) when lower forms of preference are used, must be in writing and kept in the participant/applicant file (see HSS Program Standards Guidance). Third party documentation is a requirement for payment of mortgage assistance/property taxes.

(2) Verification and related documentation must be maintained within the following specific areas:

- Homeless/Housing status (ODHS Referral form for HSP services for a TANF client indicating housing status);
- Citizenship/Qualified Non-Citizen Status (ODHS documentation of TANF status or ODHS Referral form for HSP services of a TANF client);
- Social Security Number (SSN) or application for a SSN (ODHS documentation of TANF status or ODHS Referral form for HSP services of a TANF client);
- Income, resources (ODHS documentation of TANF status or ODHS Referral form for HSP services of a TANF client); and
- Oregon residency status (ODHS documentation of TANF status or ODHS Referral form for HSP services of a TANF client).

6. Allowable Client Expenditures

(A) *General Requirements*

Where state guidance is silent or absent, OHCS-funded programs comply with OMB Uniform Administrative Requirements, Cost Principles and Audit Requirements at 2 CFR 200.

1) Eligible participants can receive HSP assistance for one or more of the following expenditures/services:

- Housing Assistance
- Program Delivery

2) HSP funds shall be provided only for reimbursement of allowable costs incurred by subgrantee/subrecipient. **HSP assistance cannot be paid directly to clients**, but must be paid to the vendor (e.g., landlord, utility company, etc.). Documentation of client expenditures must be included in the client case file.

3) There must be documented evidence of the need to make a housing assistance payment, such as an eviction or late rent notice from the landlord, past due bill from a utility company or other such documentation that a payment must be made in which to stabilize the household. Need can also be documented by joint case management plans with ODHS or by client assessments and vendor documentation.

4) As pursuant to 45 CFR 260.31, allowable expenses are to be <u>Non-Recurrent, Short-Term Benefits</u> that:
   - Deal with a specific crisis situation or episode of need; **AND**
   - Are not intended to meet recurrent or ongoing needs; **AND**
   - Are paid within 120 days from the date of the first HSP assistance payment (see #8 below for further guidance).

5) If any member in the eligibility group received HSP benefits in the past 12 calendar months, from the date of the last financial assistance payment, consider the entire eligibility group as having received benefits and they do not meet eligibility requirements. Verify previous payments with HMIS, other systems or case records. **Agencies must perform due diligence to ensure compliance with this requirement and document in the client file that this due diligence was performed.** Organizations that are contacted, to meet this requirement, must be included in the client's Release of Information. This is not expected to be administratively burdensome; however, be sure to document that the household did not receive HSP in the 12 months prior to providing benefits.

6) Households can receive up to $8,000 of total financial assistance during a 120-day period.

7) Households must comply with their client service/housing stability plan during the 120 days of assistance payments, if receiving more than one-time only housing assistance.

8) The 120-day limitation is a TANF requirement. If a client was to receive HSP benefits for longer than 120 days from the date of the first HSP assistance payment, they would be required to be enrolled in the JOBS program and the state must pursue child support collection, for which OHCS, nor subgrantees/subrecipients, are equipped to administer. **The 120-day limitation cannot be altered**.

9) The 120-day period begins on the date of the first <u>assistance</u> payment. There is no limit to the number of payments during the 120-day period as long as all payments are equal to or less than the maximum amount of $8,000 and as long as all payments are for eligible costs and paid within the 120-day period. This is NOT equal to a

number of months for which a household can receive rent/mortgage assistance. For example, a household can receive rent assistance for 6 months of arrears, current rent and 5 months of future rent for a total of 12 months of rent; however, the payments must all be made within the 120-day period in which a client can receive HSP assistance.

10) Case management (program delivery) activities, including housing navigation services, can occur before and after the 120-day limitation of financial assistance payments and do not count towards the 120-day limitation.

11) Use of other OHCS resources (such as EHAP) is encouraged to continue assisting HSP clients past the 120-day limitation of HSP funds. Many participants' barriers to housing stability cannot be fully addressed in 120 days. Continued case management and collaboration with ODHS can help to ensure long-term housing stability and produce more effective participant outcomes.

12) Extension beyond a 120-day period is **not** allowed; however, if the household exits HSP, but returns for additional assistance <u>before</u> their 120-day period of assistance would have ended, the case manager can issue additional payments up to the assistance limit and all payments must be made within the original 120-day period. The eligibility group must continue to meet all program eligibility requirements. For example, a client receives a one-time rent assistance payment on January 5th and is exited from the program. In March, the client returns and is need of further assistance. Further assistance payments could be issued through May 4th.

(B) *Roommate Situations*

1) In situations where there is a roommate in the household, the "need" must be calculated to determine how much assistance would be allowable for the household. This "need" applies to HSP, while it does not apply in other OHCS-funded programs. Additionally, such situation must be documented through evidence of a lease/rental agreement, with wet signature or valid/verified digital signature, that identifies the other member of the household as a roommate

2) "Roommate" situations are areas of high fraud probability and due diligence is needed to ensure that such situations are adequately documented. Self-certifications or dependence on a client's statement **are not** valid methods of meeting documentation requirements for roommate situations.

   a. For example, Tenant A is the "landlord" tenant, Tenant B is the "roommate" tenant. Whether Tenant B will be placed into Tenant's A unit or whether Tenant B currently lives with Tenant A, if OHCS funds are to be used for Tenant B, Tenant B must provide evidence that Tenant A has the authority to enter into a roommate agreement. Such documentation may be a copy of the amended rental agreement providing approval of the tenancy arrangement or it may be evidence that Tenant B paid an application fee to the landlord to be placed as an occupant in the unit. If a lease/rental agreement includes prohibitions for subleasing or unauthorized occupants, this could denote a fraud attempt.

3) If paying rent/utilities in a roommate situation whereby the rent/utilities is being paid to Tenant A and not the actual landlord, clear documentation of a roommate arrangement **must** include the authority document listed above, a lease/rental agreement with wet signatures (or valid/verified digital signature) demonstrating the tenant/landlord relationship between Tenant A and Tenant B **AND** documented financial records showing a pattern of financial transactions (bank statements, money order receipts, Paypal/Venmo statements, etc.) from Tenant B to Tenant A for rent/utility payments. If such evidence does not exist, payments must only be made directly to the landlord/utility company rather than to Tenant A. Hand-written receipts and client self-certification **are not** allowed for this purpose, due to the high risk of fraud. All records must be kept in the client file for monitoring purposes.

4) Placing Tenant B into a roommate situation must not jeopardize Tenant A's housing stability with an unauthorized occupant.

5) If Tenant A is seeking assistance, Tenant A must declare the income received from Tenant B as part of their income for eligibility requirements.

6) Payments made directly to the landlords is required and must adhere to rent, rent-related and rent arrears standards (see #3 above for exception).

(C) *Housing Assistance*

Requirements to Housing Assistance

1) Housing assistance is meant to provide funds to move a houseless client into permanent housing or to keep a client from losing their permanent housing. Housing assistance is not meant for emergency shelter purposes.

2) **Rent** for a client's primary residence in which the lease/rental agreement is verified (lease/rental agreement with signature, if digital, must follow requirements for a digital signature) and/or through a past due notice from the landlord. Rent payments may include a tenant's portion of a Housing Assistance Payment/Voucher rent amount when there is proof of need. A tenant's portion of a Transitional Housing rent amount is not eligible with OHCS funds. Rent can include first and last month's rent. Rent payments must be paid to the landlord, not to a tenant (see Section B above).

3) **Mortgage payments** (inclusive of property tax) are allowable for a client's primary residence and requires third-party documentation. Arrears for mortgage payments (inclusive of property tax) cannot exceed six months and must be for the purpose avoiding foreclosure.

a. **Rent/Lease-to-Own.** Rent payments (inclusive of late fees) are allowable when there is documented evidence of the amount owed and an active lease/rental agreement with the landlord. When a houselessness prevention tenant is under a rent/lease-to-own contract, a contractual monthly payment (or arrears per this manual's guidance) is allowable to keep a tenant from being houseless; however, program funds may not be used to enter into a rent/lease-to-own contract (rehousing) and cannot pay the portion of the rent/lease-to-own agreement applicable to an equity/interest/tax payment. OHCS program funds cannot be used for potential asset building. Client file must include documentation that identifies the portion of payment applicable to both rent and equity payments to ensure payment covers only the rent portion. If such evidence is not provided, the cost is unallowable.

4) **Rent arrearage** means past due rent owed to a current landlord. Payment of arrears is restricted to 6 month's past due rent, once per period of assistance payments (120 days). A copy of the lease/rental agreement may be necessary in order to determine that any lump-sum past due amount does not exceed the 6-month limitation and to validate the tenancy. Any equity/interest/tax payments within a lease-to-own agreement are unallowable and rent arrearage would apply only to the past-due rental portion amount. Third-party documentation must be included in file for lease-to-own agreements identifying the portion of rent arrears applicable to rent and equity payments when paying for rent arrearages in a lease-to-own agreement. Subgrantees and subrecipients have the discretion to further limit payments for rent arrearage with a policy that details such further restrictions, their purpose and identification of how those restrictions are communicated to the participants. Such policy must be made available to OHCS upon request Subgrantees must ensure that subrecipients have policies that align with OHCS requirements and are consistent with the intent of such a policy as outlined by OHCS.

5) **Previous Landlord Rental-related expenses.** include other expenses incurred such as rent, filing fees, property damage, court fees, late fees, lease break fees or unpaid rent owed to a previous landlord (or collection agency) **<u>when being required by a prospective landlord</u>**, with a case manager's supervisor's approval; however, total expenses cannot exceed 6 months of the rent amount charged at the previous unit. There must be **documented evidence** from the prospective landlord that payment of the arrears is necessary for the participant to obtain permanent housing and maintain stability in that housing and a unit **must** be lined up and available for the participant's occupancy if such expenses are to be paid.

6) Use of **hotel/motel voucher** (or RV space lot) must only be for a period of time in which a client is awaiting the readiness of a designated rental unit availability and not a means of emergency shelter costs (a permanent housing solution must be lined up and awaiting the client's tenancy). RV space lots can only be paid under these conditions and not as an alternative housing placement.

7) **Utility assistance** programs **<u>must be deferred to first</u>**. Utility assistance is only eligible when other utility assistance cannot be obtained and payment of utility assistance is in the context of, and documented in, an action plan or goal designed to increase housing stability, along <u>with documentation of the steps taken to defer to other utility assistance first.</u> There must be documented evidence of a utility bill in the participant's name. If paying a utility deposit for a client to obtain or retain services, there must be documented evidence of the need to pay such a deposit.

8) **Utility arrearage** assistance is past due utilities and can only be provided when there is documented evidence of a utility bill in the participant's name. If arrears are owed to a previous utility company or to a collection agency, these arrears can be paid, but only when there is documented evidence that payment of the arrears is necessary for the participant to obtain or retain utility service by the current utility company. Payment of utility arrears to a previous utility company or to a collection agency must result in the utilities remaining on or the connection/reconnection of utility service. Documentation in the client file must show the steps taken to defer to other utility assistance first.

9) **Utilities** are only water, sewer, garbage, gas, electricity, or other fuel source when required to be paid by the tenant through a rental/lease agreement. There must be documented evidence of a utility bill in the participant's name. Utilities does not include phone or internet services for the purposes of HSP, unless the need is documented in the client service/housing stability plan and identified as a means of obtaining/maintaining permanent housing (see below).

10) **Phone services** must be in the client's name and must only be provided for one line of service (either landline or cellular line) per household and only when such billing statement clearly identifies the costs of a single line of service, or such cost can be ascertained from the phone service provider. Arrearages are allowed , up to 6 months of service, in alignment with the limitation of a single line of service. Purchases of phones are unallowable. Connect clients to Oregon LifeLine (www.lifeline.oregon.gov) to meet the need.

11) **Internet-related fees and taxes, equipment** (modem/router) rental fees are allowed and must be capped at no more than $300 per biennium and must be in the client's name. Subgrantees and subrecipients must attempt to obtain a client's documentation or perform outreach to the internet provider to acquire monthly internet service costs; however, if either of these options are unduly burdensome, the subgrantee and subrecipient **must** have a policy/procedure that applies a reasonable process to determine the amount of the bill that is applicable to the internet costs; however, total internet assistance cannot exceed $300 per funding biennium. Such policy/procedure must be available to OHCS upon request. Subgrantees must ensure that subrecipients have policies/procedures that align with OHCS requirements and are consistent with the intent of such a policy as outlined by OHCS. OHCS retains the right to require modification of any policy/procedure that in its determination does not meet basic principles or requirements of such a policy/procedure.

    Internet providers retain a "price list" which can be requested to determine the separate costs for each type of service which will provide subgrantees/subrecipients a reasonable process to determine the amount to be paid. Connect clients to Oregon Lifeline to help meet the need for internet services (www.lifeline.oregon.gov).

    The costs of internet-related fees and taxes, equipment rental fees can only be provided when there is documented evidence in a client service/housing stability plan that such payment of the expense is needed for the purpose of obtaining/retaining permanent housing as a means of accessing needed services, attending required appointments or needed as part of job search.

12) **Home repairs** can be covered when necessary to make the applicant's housing habitable and if less costly than moving to other housing. Documentation in client's file must show that such costs are less costly than moving the client to other housing (or that client is restricted from moving to another housing option) and must be made on a **client-owned** property. The use of funds for home repairs, must still not exceed the total amount of assistance to the client of $8,000 for a 120-day period. Home repairs must be minimal to meet habitability standards and not as a means of major repair or rehabilitation. Documentation must include a Habitability Standards Inspection identifying the deficiencies and costs must be documented and reasonable to assist a unit meet the requirements of health and safety identified in a Habitability Standards Inspection (a Habitability Standards Inspection form can be found on the OHCS website and is not the same as an HQS or NSPIRE inspection).

13) **Pet Deposit** means a security deposit required by a landlord in order to house a family. Clients must meet the definition of literally homeless. This may be referred to by landlords as a one-time pet fee at move in or a non-refundable pet deposit. This does not include a pet deposit for clients during an existing rental/lease agreement and such expense is unallowable. Pet deposits are limited to one pet. Pet deposits for multiple pets is unallowable. Pet deposit does not include repayment of any damages caused by a pet.

14) **Pet Rent** means a monthly rent charged for a single pet and required by the landlord through a rental/lease agreement, which must be included in the client file for purposes of documentation. Pet rents for multiple pets is unallowable.

15) **Moving costs** within the state of Oregon can be provided to secure the rental of a moving van/truck. In cases where need is demonstrated, moving costs can cover the professional expenses of a contracted moving company. Moving costs do not include cash or gift cards/cash equivalents. In circumstances in which a client meets the definition of fleeing domestic violence and there are safety concerns with remaining in Oregon, moving costs can be used to assist the client to safely move to another state; however, the client file must have written documentation that a safe place is available in the destination state and such allowability must be in alignment with the client's service/housing plan. This allowability does not extend to paying an out-of-state landlord for rent, security deposit, application fees, etc., and only encompasses moving costs. Moving costs do not include cleaning of the unit which the client is leaving, disposing of trash/furnishings or other costs associated with moving out of the unit.

16) **Storage Fees:** Storage fees can be allowed for clients who meet the housing status of Category 1, Category 3 or Category 4 (literally homeless statuses). Storage fees are not allowable for clients who meet the housing status of Category 2 or Category 5 (unstably housed statuses). These costs are allowed if using funds for storage fees of personal items, such use of funds must be not more than three months of storage rent and provided as a means of securing a houseless person's belonging while

obtaining permanent housing for the purpose of rapid re-housing only. Costs can include arrears, current or future costs or any combination of those costs for the maximum total assistance of 3 months. Such households must be actively in the process of obtaining permanent housing and are awaiting placement in their home.

17) **Food** costs as a one-time benefit, emergency basis, when other resources are not available for this service and at a maximum amount of the standard for SNAP benefit (https://www.fns.usda.gov/snap/recipient/eligibility) for one month, based on household size, inclusive of any grocery delivery fees (for those clients that are home-bound). Clients receiving this service must be connected to SNAP benefits and if needed, assistance must be given to help a client apply for SNAP benefits. Client file must document steps taken to ascertain that other food resources were not available to mee the emergent need. Gift cards/cash equivalents can only be used when a gift card policy has been pre-approved by OHCS and the limitation for food costs are identified in such policy and cannot exceed the limitation stated above.

Allowable Costs for Housing include:

(1) rent and rent arrears (inclusive of first, last, pet rent, and if accepted by landlord as an incentive, forward rent);
(2) mortgage (mortgage arrears up to six months);
(3) property taxes, up to one year, if necessary to avoid foreclosure (evidence of foreclosure notification must be kept in the client's file);
(4) late fees;
(5) move-in fees;
(6) security deposit (inclusive of pet deposit as identified in requirements above);
(7) application fee;
(8) utility payments/deposits/arrearages (inclusive of water, sewer, garbage, gas and electricity);
(9) phone and internet (as identified in requirements above)
(10) moving costs (van/truck rental);
(11) storage fees;
(12) food;
(13) hotel/motel voucher until rental unit available; and
(14) costs of home repairs necessary to make the applicant's housing habitable and if less costly than moving to other housing.

Unallowable Housing Assistance

(1) Cash;
(2) Cash-equivalent funds provided to applicants/participants, except through an OHCS-approved gift card policy;
(3) Consumer debt payment;
(4) Hotel/motel expenses (except as identified above while awaiting placement in permanent housing with a unit lined up for the client's placement)
(5) Civil or criminal legal services;
(6) Parking/carport/garage rent/fees;
(7) Childcare/eldercare services/nursing care/cleaning services;
(8) Renter's insurance, even if required by landlord;

(9) Stipends or direct payment to client for any purpose;
(10) Phone purchases for clients;
(11) Property damages to a unit, except as otherwise provided in Previous Landlord Rental Related expenses
(12) Landlord damages or loss mitigation programming; and
(13) HOA fees.

(D) *Case Management/Program Delivery*

Case Management/Program Delivery are costs determined necessary to enable a household to obtain/retain their housing and achieve housing stability as identified and documented in their client service/housing stability plan (when receiving more than one-time assistance). Case management is one of the primary services offered to families who face multiple challenges, including severe mental illness, addiction, and homelessness. Effective case management includes **assessment, planning, implementation, coordination and evaluation**. Best practices in case management skills are available on the OHCS Homeless Services Section dashboard.

Case Management is a Program Delivery expense in OPUS.

Requirements to Case Management/Program Delivery

(1) Case management costs are allowable for all recipients of HSP.
(2) **Case management DOES NOT include time spent for eligibility determinations.** Per TANF rules and regulations time expended on eligibility determinations cannot be included in case management expenses but must be attributed to administration costs (this is different than in other OHCS HSS programs, so be sure to follow this guidance).
(3) Case management/program delivery cannot exceed more than 20% of a subgrantee's total fiscal year allocation.
(4) Costs that can be directly attributed to program delivery can be paid with program funds, such as a direct staffing costs attributable to the delivery of the program (case worker, housing navigators, mediation, tenant readiness education, etc.). Indirect costs, by their nature (such as a subgrantee's utilities or maintenance of a copier used for many programs) are not a direct cost and may not be directly attributed to the delivery of program services. Indirect costs charged to program delivery must be in accordance with an organization's written cost allocation plan or Negotiated Indirect Cost Rate Agreement (NICRA) and must be consistently applied to all programs, whether OHCS-funded or not. See OMB 2 CFR 200 Subpart E for more information
(5) Case management can occur before and/or after client assistance payments begin.
(6) Case management is not required for one-time only assistance; however, subgrantees are encouraged to include case management planning in their ODHS Collaboration Plans
(7) If providing case management, the client must have a client service/housing stability plan and case management must be used to assist clients in meeting their goals identified in such plan.

Allowable Costs for Case Management include:

(1) Providing diversion benefits and services;

(2) Providing program information to clients;

(3) Screening and assessing a household's needs (**excludes eligibility determination, which is a part of admin**);

(4) Development of a Housing Stability Plan, which may include employability plans, work activities, post-employment services and work supports;

(5) Salaries and benefits costs for staff providing program services;

(6) Building relationships with landlords, property managers, and other housing service providers;

(7) Monitoring and evaluating household progress, identifying creative and immediate housing solutions outside of the traditional homeless service system (diversion), and ensuring that households' rights are protected;

(8) Services that increase access to the income supports of disability benefits programs administered by the Social Security Administration for eligible members of the household and have a serious mental illness, medical impairment, and/or a co-occurring substance use disorder (i.e., SOAR or similar style services);

(9) Identifying available housing units and providing housing navigation to assist a household navigate the housing market, which can include referrals to available housing or housing search assistance, assistance with completing applications for available housing or for other state or federal on-going rent assistance program, such as Housing Choice Voucher Program (Section 8);

(10) Tenant counseling, assisting households to understand leases, inspections, securing utilities, making moving arrangements, and representative payee services concerning rent and utilities;

(11) Mediation and outreach to property owners/landlords related to assist a client in managing their housing stability;

(12) Connecting clients to resources available in the community, such as state or federal benefits that provide income to the household, employment assistance; health and mental health or behavioral health referrals or substance abuse referrals, domestic violence intervention, legal referrals or tenant education referral; and

(13) Costs associated with data entry into HMIS.

Unallowable Costs for Case Management include:

(1) Food, candy, treats or gifts for employees

(E) *Gift Cards*

Use of gift cards/cash equivalents must be rare; however, gift cards/cash equivalents can be allowable when given to eligible HSP clients **only for food costs** as identified in this manual, within the limitations specified, and must be in support of the client's written housing goals and only allowable when adequate documentation exists to support the purpose and the expense. "Rare" means very unusual or not occurring often. It is not rare if, for example, 10% of your clients receive gift cards/cash equivalents, which would denote that gift cards/cash equivalents are used as a method of service delivery, which is unallowable when other methods are available. There are multiple alternatives to using gift cards/cash equivalents which are highly recommended:

- Partner with bus or transportation services that bill for their eligible clients.
- Partner with stores for a voucher system. A voucher is a document which is worth a maximum dollar value, and which may be used only for specific items at a specific vendor. Vouchers are very similar to purchase orders. In advance, the organization establishes agreements with a vendor under which the vendor agrees to accept a “voucher” at the point of sale and then invoices the organization for the actual purchase. The voucher is created in multiple parts with one copy being sent to the vendor, one copy given to the individual making the purchase and at least one copy retained by the organization. The voucher must be uniquely numbered and must clearly detail the allowed item(s) and the maximum cost the purchaser is allowed to spend on the item(s). The vendor invoices for the actual amount of the purchase up to the maximum established cost listed on the voucher.
- Partner with clothing stores that will bill for clothing selected by eligible clients and the clothing can be picked up once the bill is paid (for example, Salem-Keizer Schools currently has this arrangement with Kohl’s).
- Online purchases. Subgrantees can use a credit card to purchase the item through an online vendor and have the item shipped. Some online vendors (such as Walmart.com) also offer a same day pick up option for items currently available in local stores. Same day pick up allows an organization to make the purchase online and specify the name of an individual(s) authorized to pick the item up at their local store.
- Employee purchase. An employee goes to a store and purchases the needed items with either a company credit card or receives reimbursement by submitting detailed receipts for allowable costs.

Gift Card Requirements:

1) Subgrantee must have prior approval of a stand-alone gift card policy by OHCS **before incurring costs for gift cards/cash equivalents**. Prior approval must occur through the funding application only. Email, text or phone calls cannot be a method used for the approval of a Gift Card Policy/Procedure. Approval of a Gift Card Policy in one biennium, does not mean approval is provided in a prior or subsequent biennium. The date in which a Gift Card Policy/Procedure is approved, is the date in which costs may be incurred for such purpose and does not allow for purchases of gift cards/cash equivalents prior to the approval date, retroactively, and will be disallowed. Approval runs through the end of the biennium in which the policy/procedure was approved. The gift card policy/procedure must be prior-approved each biennium during the OHCS funding application. OHCS retains the right to require modification of any policy/procedure that in its determination does not meet basic principles or requirements of such a policy/procedure.
2) Subrecipients of a subgrantee **must** follow the provision of the subgrantee’s approved gift card policy/procedure and all OHCS requirements for the use of gift cards/cash equivalents; however, subrecipients can create their own procedures

for how they will implement the subgrantee's OHCS-approved policy/procedure (such as the position title of an approver, etc.). Subrecipients cannot have their own policy that does not comply with OHCS requirements and if funds are awarded under a policy not meeting OHCS requirements, costs will be disallowed.

3) Costs will be disallowed without a prior OHCS-approved Gift Card Policy/Procedure.

4) Subgrantees must document in their Gift Card Policy the justification as to why they must use gifts cards/cash equivalents rather than providing assistance through conventional means, such as partnerships with service providers, checks for goods/services to providers, or voucher options.

5) Gift cards/cash equivalents <u>cannot be used in HSP for anything except for the food costs identified in this manual</u> and in support of a client's written housing goals

6) Subgrantee must maintain complete record of gift card/cash equivalent purchases and issuance and gift cards/cash equivalents must be kept in a secure location.

7) Issuance of a gift card/cash equivalent must be in the context of an action plan or goal designed to increase housing stability and such plan/goal clearly documents, in writing, how the purpose of the gift card/cash equivalent is helping the client obtain or maintain housing stability.

8) Documentation will be reviewed during monitoring and costs will be disallowed without sufficient documentation.

9) The cost must be allocable, within program guidelines and must adhere to internal controls (OMB 200.403, 200.303) and must clearly meet the intent of ORS 458.650(1), showing a connection to housing stabilization.

10) Gift cards/cash equivalents for the purchase of food must follow OHCS guidance for limitation.

11) Subgrantee procurement policies must be followed when purchasing gift cards/cash equivalents.

12) Gift cards/cash equivalents must be purchased and issued to clients within the same grant period. For any gift cards/cash equivalents that are not issued within the same grant period in which they were purchased, subgrantees must submit a negative request for funds for the grant period in which the gift cards/cash equivalents were purchased totaling the amount of the unissued gift cards/cash equivalents and other non-OHCS funds must be used for the cost of the gift cards/cash equivalents. Such negative request for funds must be submitted within 60 days after the end of the performance period (Aug 30).

13) Subgrantee must identify the dollar limitation for gift cards/cash equivalents per client, in alignment with allowable food costs.

14) Client must receive documentation that identifies the purpose and intent of the gift card/cash equivalent and must acknowledge, by written, legible, wet signature, the same, and such documentation must be kept in the client's file. Gift cards/cash equivalents require an in-person exchange and **must not** ever be mailed to a client.

15) Issuance of a gift card/cash equivalent must be in the context of an action plan or goal designed to increase housing stability and such plan/goal clearly documents, in

writing, how the purpose of the gift card/cash equivalent is helping the client obtain or maintain housing stability.

16) Even if a Gift Card Policy/Procedure is approved by OHCS for general uses (such as is allowable in other OHCS programs, for the purpose of HSP, gift cards must only be used for food costs.

Gift Card Policy must include the following:

1) Justification as to why they must use gifts cards/cash equivalents rather than providing assistance through conventional means, such as partnerships with service providers, checks for goods/services to providers, or voucher options (i.e., why are other options of providing assistance not available?);
2) When gift cards/cash equivalents are used for food purchases, policy/procedure must clearly identify the limitations as stated in this manual;
3) Identifies internal controls on how gift cards/cash equivalents are purchased and issued to clients within the same grant period;
4) Identifies internal controls on how gift cards/cash equivalents are securely maintained, who has access to gift cards/cash equivalents, and how the issuance of gift cards/cash equivalents is tracked;
5) Identifies, per client, dollar limitation for gift cards/cash equivalent and frequency limitation for how often a client can receive a gift card/cash equivalent, in alignment with allowable food costs. Additionally, policy must identify internal controls on how these limitations are tracked to ensure compliance with the limitation;
6) Requirement that issuance of gift card/cash equivalent is in context to a client's action plan or goal designed to increase housing stability and that such plan is included in the client file; and
7) Written, legible, wet signature statement from client that identifies purpose and intent of gift card/cash equivalent and acknowledging and agreeing to the receipt of the gift card/cash equivalent under the intended purpose.

7. Maintenance of Effort (MOE)

Subgrantees shall make Maintenance of Effort (MOE) contributions in compliance with 45 CFR 92.24, 92.3, 263.2 through 263.6 to supplement the program in an amount required by OHCS each fiscal year, unless otherwise directed by OHCS. Subgrantees will be notified of the required MOE obligation for each subgrantee in the subgrantee's grant agreement/contract Funding Application (subgrantee's grant agreement/contract Funding Application Process)

Allowable MOE expenditures that are made on behalf of an eligible needy household, must comply with HSP allowable client expenditures within the 120-day HSP expenditure limitation as detailed in this manual.

MOE funds must serve TANF families whose income is at or below 250% of the Federal Poverty Level (FPL), when the allowable MOE requirements are met. MOE requirements can be met through ODHS documentation of TANF status or ODHS Referral form for HSP services of a TANF client and include:

(1) Eligible families with income up to 250% of FPL, must also have a
(2) Qualifying dependent child, be a
(3) Citizen or have Qualified Non-Citizen Status; be a
(4) Resident of Oregon, and have a
(5) SSN; and
(6) Meets the TANF requirement for funding that MOE be provided for one of the following four purposes:
   a) assisting needy families, so that children can be cared for in their own homes (HSP MOE typically meets this purpose);
   b) reducing the dependency of needy parents by promoting job preparation, work and marriage;
   c) preventing out-of-wedlock pregnancies; and
   d) encouraging the formation and maintenance of two-parent families.

Countable TANF MOE funds are other state, county, local governments, and other such public or private funds. MOE can be:

(1) Cash, or
(2) Third party in-kind contributions, such as volunteer services, or professional services. In- kind services must be identified through a MOU with partner organizations. **OHCS must approve the methodology used for valuation prior to including the value on the quarterly report.**

MOE funds must not be otherwise counted towards a federal cost-sharing or matching requirement. Examples of cash and in-kind MOE funds can be found on the HSS dashboard.

Expenditures counted towards MOE cannot exceed the limitation of assistance as identified for HSP.

The following does NOT count as MOE:

- Any funds that originated with the Federal government;
- State funds expended under the Medicaid program;
- State funds from a prior fiscal year; and
- Any funds used as MOE for a previous HSP grant.

If subgrantee/subrecipient wish to use other state funds, they **must** make sure that they do not originate from TANF funding. If using an ODHS source for MOE, you **must document** your due diligence that such funds are not otherwise counted for the purposes of MOE and that the funding source does not originate from TANF federal funds, but are actually state dollars and not Medicaid state dollars. Be sure to connect with your ODHS office before trying to use their funding source as MOE.

In addition, when using state funds that pay for child support collection services, childcare services, alcohol or drug abuse treatment, or educational services, there are a few other guidelines that apply. These are not common sources, but more information is available. Be sure you know how and when you can count them for MOE. Use the Appendix in this manual for additional guidance.

8. Financial Management

(A) *Administration*

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

Allowable administrative costs, including indirect administration cost allocations, benefit the organization as a whole and cannot be attributed specifically to a particular program.

For HSP, eligibility determinations must also be included as part of administrative costs per TANF rules and regulations and **cannot be considered as part of case management/program delivery costs**.

All amounts billed to administration must be supported by actual costs. Administration funds may be used after the end of the expenditure period until the final report is due (August 30 of each fiscal year) in order to close out the grant (2 CFR 200.403(h)). If incurred, these costs must be liquidated prior to the due date of the final report(s) (Aug. 30) and charged to the final budget period of the award. Closing out grants is defined as payroll costs incurred after the end of the expenditure period, such as:

1. costs associated with completing final reports;
2. submitting final requests for funds; and
3. closing the grant within the subgrantee's/subrecipient's organization.

This allowability only applies to administrative funds needed to close out the grant, such as payroll costs for fiscal staff. This DOES NOT apply to any program delivery or financial assistance category of funding, but applies only to administrative funds and subgrantee/subrecipients must be able to identify in any audit/monitoring that costs were <u>incurred</u> after the end of the expenditure period were for the sole purpose of closing out the grant. All program funds must be fully expended within the expenditure period of the grant.

There is no universal rule for classifying certain costs as either direct or indirect under every accounting system. A cost may be direct with respect to some specific service or function, but indirect with respect to the award. Therefore, it is essential that each item of cost incurred for the same purpose be treated consistently in like circumstances either as a direct or an indirect cost in order to avoid possible double-charging of awards and that this consistency is included in all grants received by the subgrantee, whether or not they originate from OHCS. Indirect costs must be in accordance with an organization's written cost allocation plan or Negotiated Indirect Cost Rate Agreement (NICRA) and must be consistently applied to all programs, whether OHCS-funded or not. Subgrantee/Subrecipients **must** have a written cost allocation plan or NICRA. Guidelines for determining direct and indirect costs charged to awards are provided in OMB 200.

Travel costs must be adequately documented and support business purposes (documentation is insufficient if verifying the reservation only and not the completed travel). Payment for travel expenses must be authorized in advance, in writing, unless the individual has previously been approved to travel by virtue of an approved description of job duties that include travel. Reimbursement of travel expenses does not count as wages or remuneration.

Record of travel expenditures must be kept, including purpose, mileage and payment. When reimbursing for meal, lodging and travel, subgrantees/subrecipients **must** use the U.S. General Services Administration per diem rates located at: https://www.gsa.gov/travel/plan-book/per-diem-rates and applied consistently to all volunteers and employees for actual and necessary expenses backed by receipts. In the case of volunteers, the cost of meals when there is no overnight stay and not associated with an official state business meeting is reportable as income. Any funds expended on the reimbursement of expenses for travel must be appropriately documented and cannot be provided through a cash or cash equivalent payment.

Per 45 CFR 263 the term “administrative costs” means costs necessary for the proper administration of the program.

(1) It excludes direct costs of providing program services.

  (a) For example, it excludes costs of providing diversion benefits and services, providing program information to clients, screening and assessments, development of employability plans, work activities, post-employment services, work supports, and case management. It also excludes costs for contracts devoted entirely to such activities (see Case Management/Program Delivery section of this manual).

  (b) It excludes the salaries and benefits costs for staff providing program services and the direct administrative costs associated with providing the services, such as the costs for supplies, equipment, travel, postage, utilities, rental of office space and maintenance of office space.

(2) It includes costs for general administration and coordination of these programs, including contract costs and all indirect (or overhead) costs. Examples of administrative costs include:

  (a) Salaries and benefits of staff performing administrative and coordination functions;

  (b) Activities, staff costs related to eligibility determinations;

  (c) Preparation of program plans, budgets, and schedules;

  (d) Monitoring of programs and projects;

  (e) Fraud and abuse units;

(f) Procurement activities;

(g) Public relations;

(h) Services related to accounting, litigation, audits, management of property, payroll, and personnel;

(i) Costs for the goods and services required for administration of the program such as the costs for supplies, equipment, travel, postage, utilities, and rental of office space and maintenance of office space, provided that such costs are not excluded as a direct administrative cost for providing program services under Case Management/Program Delivery in this manual;

(j) Travel costs incurred for official business and not excluded as a direct administrative cost for providing program services under Case Management/Program Delivery in this manual;

(k) Management information systems not related to the tracking and monitoring of requirements (e.g., for a personnel and payroll system); and

(l) Preparing reports and other documents.

Unallowable costs include, but are not limited to:

(1) Late fees assessed due to a subgrantee/subrecipient failure to pay in a timely manner;

(2) Subgrantee/subrecipient facility mortgage payments;

(3) Food, candy, treats and gifts for employees; and

(4) Lobbying.

(B) *Request for Funds Documentation*

Timely submission of AGRs/RFFs are crucial for HSP. Submit AGRs/RFFs frequently (frequently is defined as every 60 days or sooner**). All HSP funds MUST be expended and all funds drawn from OPUS by the 20th day following the end of the fiscal year.**

The final FSR (Financial Status Report) must be submitted in OPUS within 60 days of the end of the fiscal year, per subgrantee's grant agreement/contract requirements or funds will be subject to recapture/deallocation by OHCS. See the HSS Program Standards Guidelines for more information.

(C) *Funds Spend Down*

Any funds not drawn by 60 days following the end of the funding period, are subject to recapture/deallocation by OHCS. **There are no exceptions allowed for HSP funds**. See HSS Program Standards Guidance for more information.

9. Reporting Requirements

(A) *Submissions/Reporting Requirements*

Program reporting (as identified below) is a program delivery expense.

It is critical that subgrantees meet deadlines for the submission of data, budgets, and reports (including, but not limited to annual, quarterly, implementation, and financial status reports, etc.) as required by OHCS. Subgrantees must submit materials requested by OHCS by the deadline provided by OHCS and in the form and format required. **Any submission that is incomplete and/or does not provide accurate information or is submitted after the deadline will be considered by OHCS to be late and out of compliance with requirements**.

Subrecipient reporting to subgrantee **must** occur timely, so that subgrantees can meet the required deadline for reports to OHCS. It is the subgrantee's responsibility to ensure that subrecipients provide information to the subgrantee as required so that subgrantees can meet the reporting requirements of OHCS inclusive of subrecipient information. Lack of compliance by a subrecipient in meeting reporting requirements does not provide an exception to, or reprieve of, the requirements for the subgrantee to report timely and accurately.

Failure to provide required data or reports can result in an audit finding in the Monitoring Report and other remedies as afford in the OHCS Grant Agreement/Contract.

At the discretion of OHCS, other reports can be required when deemed necessary by OHCS and subgrantees are subject to such requirement.

See the HSS Program Standards Guidance for more information.

(B) *HSP Referral Tracking and Quarterly Provider Report*

Subgrantees are required to submit the HSP Referral Tracking and Quarterly Provider Report, in form and format required by OHCS including subrecipient information, by the 20th of the month following the end of each quarter (Oct 20, Jan 20, Apr 20 and Jul 20). **OHCS CANNOT allow extensions for HSP**, so it is imperative that reports are provided by this date. Even if extensions are provided on other OHCS programs, subgrantee must submit the HSP reports by the due dates. If OHCS is unable to meet ODHS requirements for reporting, ODHS will not be able to use the MOE reported within their reporting period to HHS and this can decrease TANF funds to the state and can reduce the funds awarded to this program.

If any modifications to the HSP Referral Tracking and Quarterly Provider Report are desired, they must be prior approved by OHCS before use and during the subgrantee's grant agreement/contract Funding Application process. Subgrantees MUST NOT add any restrictions, protections, or other permissions to the HSP Referral Tracking and Quarterly Provider Report. Any report submitted that has been altered in form or format and/or includes restriction, protections or permission will be returned to the subgrantee for correction and resubmission. The deadline for submitting the report is not extended for reports submitted that do not meet OHCS requirements. Submissions that occur after the deadline are considered late by OHCS and out of compliance with program requirements. If the requirement for complete and accurate reports by the due date, in the form and format required by OHCS, are not met, the subgrantee is out of compliance with program requirements and may result in a monitoring finding or other remedies as afforded in the OHCS Grant Agreement/Contract.

If an error on a previous quarter's reporting is discovered by the subgrantee, the subgrantee **cannot** go back and make changes to a previously submitted report; but must make corrections in the next quarter's report. For example, if MOE is reported as $900 in Quarter 1 and it was determined that only $800 was provided, subgrantee must reflect in Quarter 2 the deduction of $100 – subgrantee cannot modify Quarter 1's MOE to reflect $800. This information will have already been reported to ODHS, so corrections must be made in the quarter in which the error was discovered.

Blank templates for the HSP Referral Tracking and Quarterly Provider Report can be found on the HSS Dashboard at: https://app.smartsheet.com/b/publish?EQBCT=8a215621578a4f76ae98113d719d5e64

(C) *Fiscal Reporting*

All HSP funds MUST be expended, and all funds drawn from OPUS by the 20th day following the end of the fiscal year.

The final Agency Grant Status (AGS)/FSR (Financial Status Report) must be submitted in OPUS within 60 days of the end of the fiscal year.

10. Appendix 1: Applicable Rules and Regulations

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

1. TANF Rules and Regulations: See https://www.acf.hhs.gov/ofa/programs/tanf/laws-regulations.
2. Food Stamp Act: 7 USC §2020(e)(8), 7 CFR § 272.1(c); ORS 411.320 and 411.990; OAR 461-105-0010 through OAR 461-105-0140.
3. Temporary Assistance to Needy Families (TANF): 42 USC § 602(a)(1)(A)(iv); ORS 418.130 and 418.990; OAR 461-105-0010 through 461-105-0140.
4. Health Insurance Portability and Accountability Act of 1996, as amended: Public Law 104–191—Aug. 21, 1996
5. Medicaid: Medicaid Services under the Medicaid Act, Title XIX, 42 USC § 1396 et. seq; including § 1396a(a)(27); 42 CFR § 431.107(b)(1) & (2); 42 CFR Part 1002.3(a); 42 CFR Part 455 Subpart (B); 42 USC § 1396(a)(57) and (w); 42 CFR Part 431.107(b)(4); 42 CFR Part 489 Subpart I; Section 6032 of the Deficit Reduction Act of 2005, 42 USC § 1396a(a)(68).; ORS 411.320 and 411.990; OAR 461-105-0010 through 461-105-0140.
6. Income Eligibility Verification System (IEVS): 5.3.1.4.1 42 USC § 1320b-7, 20 CFR § 603; ORS 411.320, 411.990, ORS 418.130, 418.990; OAR 461-105-0010 through 461-105-0140.
7. Social Security Numbers: 5 USC § 552a, 42 USC §405 and § 408, and individual programmatic confidentiality provisions; ORS 411.320, 411.990, ORS 418.130, 418.990; OAR 461-105-0010 through 461-105-0140.
8. Tax Information: 26 USC § 6103, 26 USC § 7213(a) (2); ORS 314.835, ORS 314.840 and ORS 314.991.
9. Unemployment Insurance Information: ORS 657.670; ORS 411.320, 411.990, ORS 418.130, 418.990; OAR 461-105-0010 through 461-105-0140.
10. Alcohol and Drug Information: 42 USC § 290dd-2; 42 CFR § 2.1; ORS 411.320, 411.990, ORS 418.130, 418.990; OAR 461-105-0010 through 461-105-0140.
11. Mental Health Information: 42 USC § 6041, 42 USC § 10841(1) (H); ORS 179.505 and ORS 192.515 through ORS 192.525.
12. Child Abuse Information: ORS 419B.035.
13. Support Enforcement Information: 42 USC § 654(26), ORS 25.260 and 25.990; OAR 461-200-1140.
14. Criminal Background Check Information: ORS 181.536, 181.537 and ORS 181.540; OAR 461-165-0400.; OAR 407-007-0000 through 407-007-0640.
15. School Records: ORS 192.496(4) and ORS 326.565; OAR 581-021-0330 and OAR 581-021-0350.
16. Disclosure: 42 CFR Part 455.104 and 455.434.
17. Public Records In General: ORS 192.496 through 192.530.

18. <u>Misuse of Confidential Information:</u> ORS 162.425.
19. <u>Refugee Program:</u> 45 CFR 400.27, OAR 461-105-0010 through 461-105-0140.
20. <u>Faith-Based Organizations</u>: 45 CFR Part 87; Federal Register, July 16, 2004, Vol. 69, #136.
21. Federal Intellectual Property Rights Notice: 37 CFR Part 401
22. <u>Federal Whistleblower Protection:</u> 41 USC 4712, Pilot Program for Enhancement of Employee Whistleblower Protection; Attachment 4, "Information Required by 2 CFR Subtitle B and 2 CFR 200.331(a)(1)".
23. ORS 456.515 through 456.725: *Housing and Community Services Department*
24. ORS 458.505 through 458.545: *Community Services Program*
25. OAR 166-300: *State Agency General Records Retention Schedules*
26. OAR 813-051: *Housing Stabilization Program*
27. Inter-Agency Agreement between ODHS and OHCS
28. **This manual** as guidelines for HSP, and all other references made within this manual.
29. HMIS Data Standards Manual: https://www.hudexchange.info/resource/3824/hmis-data-dictionary/
30. **CFRs** cited are amended from time to time and can be found at: http://www.ecfr.gov/cgi-bin/text-idx?c=ecfr&tpl=%2Findex.tpl
31. **ORS** cited are amended from time to time and can be found at: https://www.oregonlegislature.gov/bills_laws/Pages/ORS.aspx
32. **OARs** cited are amended from time to time and can be found at: https://secure.sos.state.or.us/oard/ruleSearch.action
33. **OMBs** cited are amended from time to time and can be found at: https://www.whitehouse.gov/omb/information-for-agencies/circulars
34. The ODHS Oregon Programs Eligibility Notebook can be found at: https://www.oregon.gov/dhs/ssp/fsm/pages/index.aspx **Limited English Proficiency** federal interagency website can be found at: http://www.lep.gov/ and FAQs can be found at: https://portal.hud.gov/hudportal/HUD?src=/program_offices/fair_housing_equal_opp/promotingfh/lep-faq.

11. Appendix 2: Acronyms

Acronyms commonly used in this program are:

AGR	Agency Grant Request
AGS	Agency Grant Status
CFR	Code of Federal Regulations
FPL	Federal Poverty Level
FSR	Financial Status Report
HHS	U.S. Department of Health and Human Services
HMIS	Homeless Management Information System
HSP	Housing Stabilization Program
HUD	U.S. Department of Housing and Urban Development
MOE	Maintenance of Effort
OAR	Oregon Administrative Rule
ODHS	Oregon Department of Human Services
OHCS	Oregon Housing and Community Services
ORS	Oregon Revised Statute
OSP	Oregon State Police
RFF	Request for Funds
SNAP	Supplemental Nutrition Assistance Program (formerly food stamps)
SSI	Social Security Income
SSN	Social Security Number
TANF	Temporary Assistance for Needy Families

12. Appendix 3: Definitions

Barriers to Employment include lack of childcare, education, transportation, or work experience, lack of a high school degree or GED (General Educational Development) Certificate, illiteracy, low English proficiency, a history of incarceration or detention for criminal activity, or a history of unstable employment.

Caretaker Relative:

The Dependent Child must live with a Caretaker Relative:

Any blood relative of the dependent child's, stepfather, stepmother, stepbrother, stepsister or **an individual who has legally adopted the dependent child.**

U.S. Citizen

A U.S. citizen includes the following people:

(a) A person born in the U.S.;
(b) A naturalized citizen;
(c) A person born outside of the U.S., but whose parents (both mother and father) are U.S. citizens;
(d) A person born outside of the U.S., who is over 18 years of age, but who has at least one parent who is a U.S. citizen. The person must either have a certificate of U.S. citizenship or meet one of the following criteria:
    (i) Born on or after December 24, 1952, and prior to November 14, 1986, and their citizen parent was physically present in the U.S. or its outlying possessions for 10 years or more, at least five of which were after age 14;
    (ii) Born on or after November 14, 1986, and their citizen parent was physically present in the U.S. or its outlying possessions five years or more, at least two of which were after age 14.
(e) A child born outside of the U.S., who is under 18 years of age and has at least one parent who is a U.S. citizen. The child is residing in the U.S. in the legal and physical custody of the citizen parent pursuant to a lawful admission for permanent residence;
(f) A person lawfully adopted by U.S. citizens; or
(g) A citizen of Puerto Rico, Guam, the Virgin Islands, the Northern Mariana Islands (Saipan, Tinian, Rota and Pagan), American Samoa and the Swains Islands.

(1) Qualified Non-Citizen

Qualified non-citizens are individuals who are admitted to the United States with a lawful immigrant status. The person who is granted that status either enters the United States as a lawful permanent resident or will be eligible to become a lawful permanent resident in the future. A lawful permanent resident is eligible to be naturalized as a U.S. citizen usually after five years of lawful permanent residency in the U.S.

A qualified non-citizen includes the following people:

(a) A person who is lawfully admitted for permanent residence under the Immigration and Nationality Act (INA);
(b) A person who is admitted to the United States as a refugee under section 207 of the INA;

(c) A person admitted to the United States under the Trafficking Victims Protection Act of 2000;
(d) A person who is granted political asylum under section 208 of the INA;
(e) A person whose deportation is being withheld under section 243(h) of the INA;
(f) A person who is paroled into the United States under section 212(d)(5) of the INA;
(g) A person who is granted conditional entry pursuant to section 203(a)(7) of the INA as in effect prior to April 1, 1980;
(h) Battered immigrant spouse, battered immigrant child, immigrant parent of a battered child or an immigrant child of a battered parent, with a petition under 204(a)(1)(A) or (B) or 244(a)(3) of the INA;
(i) Cuban/Haitian persons who are either public interest or humanitarian parolees; or
(j) A person granted immigration status according to the Amerasian Homecoming Act, section 584(a) of the INA.

(2) Additional Qualified Non-Citizens

The following people also meet qualified non-citizen status requirements for HSP:
(a) American Indians born in Canada; or
(b) Non-citizens (regardless of INS status) who are currently victims of domestic violence or are at risk of victimization by domestic violence.

(3) Non-Qualified, Non-Citizen

Non-qualified non-citizens are:
Individuals who are admitted lawfully into the United States but do not have immigrant status (i.e., they are residents for a specific period, but cannot stay in the country for longer than their travel visa allows them). Foreign students, tourists, diplomats, performers, artists, entertainers, certain private company employers, etc., are included in this category.

If there any further questions on non-citizens, find the information at the following link of the ODHS Oregon Programs Eligibility Notebook:
https://www.oregon.gov/odhs/benefits/pages/open-manual.aspx.

Client means a household who has received an assessment of need, has been entered into an OHCS-funded program (intake) and who is receiving financial assistance. Once a household receives financial assistance, they are considered a client.

Dependent Child: *A dependent child must be one of the following:*
(1) An individual who is living with the caretaker relative and is under the age of 18, **OR** is under 19 and a full-time student in high school or the equivalent level of vocational or technical training; **OR**
(2) A minor parent whose parents have chosen to apply for benefits for the minor parent (this does not apply to a minor parent who is married and living with his or her spouse); **OR**
(3) An unborn child (see client eligibility requirement for pregnancies)

Domestic Violence: This definition includes domestic violence, dating violence, sexual assault, stalking, attempting to cause, or intentionally, knowingly or recklessly causing or placing another in fear of imminent serious physical injury or emotional, mental or verbal abuse, and using coercive or controlling behavior. This does not include other criminal acts such as violence perpetrated by a stranger, neighbor, acquaintance or friend, unless those persons are family members, intimate partners or household members.

HMIS means Homeless Management Information System. Victim Service Providers must use an HMIS comparable database.

Marriage means the union of two individuals who are legally married. Legally married means a marriage uniting two individuals according to the provision of:

(1) The statutes of the state where the marriage occurred;

(2) The common law of the state in which the two individuals previously resided while meeting the requirements of common law marriage in that state; or

(3) The laws of a country in which the two individuals previously resided while meeting the requirements for legal or cultural marriage in that country.

Parent means the biological mother or father of an unborn child or the biological, step, or adoptive mother or father of a child.

Participant means a household who may or may not be a client, but is receiving OHCS-funded services (such as case management).

Spouse means an individual who is legally married to another individual.

Stand-Alone Policy/Procedure means a written policy/procedure that includes all the requirements for such a policy/procedure and is either its own separate document or it is included in a larger document, such as a policy and procedures handbook, that can easily be separated from the larger document for the purpose of approval and review by OHCS.

Subgrantee Agency: Community Action Agencies (or other qualified entities) that receive funding from the Grantee (OHCS) and provides client assistance payments/services. Subgrantee agencies may contract client assistance payments/services to subrecipients.

Subrecipient: Subrecipients are entities that, by contract with the subgrantee agency, provide assistance payments/services and receive funding directly from the subgrantee agency. Through its agreements with subgrantee agency, subrecipients mustl comply with all requirements for the Housing Stabilization Program. Subrecipients include a subgrantee's subcontractors, contractors, vendor, subrecipients and any subcontractors, contractors, vendors or subrecipients of a subcontractor, contractor, vendor or subrecipient. Subrecipients are those organization that receive OHCS funding from the Subgrantee or from the Subgrantee's subrecipient.

Support Network: Examples include family, friends and faith-based or other social networks.

Target Population means persons a subgrantee/subrecipient wishes to reach out to who are under-represented in their service population (such as refugees, teen parents, SSI recipients).

Temporary Living: Residing in a facility for fewer than 90 days

Unaccompanied Youth with Child/ren: For the purpose of household composition, includes a minor parent under the age of 18 or a teen parent under the age of 20 and has not completed a high school diploma or GED program.

If the Unaccompanied Youth with Child/ren is a Minor Parent (under the age of 18), to be eligible for benefits, the Minor Parent must live with his/her parent, legal guardian or another adult relative. If it is determined that it is in the best interest of the minor parent to live on their own, the minor parent must attend high school or its equivalent full-time or participate in the Department of Human Services JOBS or other training program to develop employment or self-sufficiency skills.

Operational Flexibility: Sexual abuse or other physical or emotional abuse is grounds to waive the requirement that a minor parent live with their parent(s), legal guardian or other adult relative in order to receive benefits. The decision to waive this requirement may also be based on the unavailability of the parent(s), legal guardian or other adult relative in providing the minor parent's care, control and supervision. This is true when they are not living in the same state, or when the minor parent has been living on his/her own for over 12 months before or since the birth of his/her last child.

If a Minor Parent returns to live with his/her parent, parents or legal guardian, consider the parent, parents, or legal guardian's income during application for benefits.

(End)

13. Appendix 4: MOE FAQs

1. What kinds of expenditures DO NOT count towards MOE:

(1) Funds that originated with the Federal government;
(2) State funds expended under the Medicaid program;
(3) State funds from a prior fiscal year;
(4) Any funds used as MOE for a previous HSP grant (not used again for MOE on a subsequent grant award).

2. What are some examples of Cash contributions that DO NOT count towards MOE:

- Low-Income Home Energy Assistance Program (LIHEAP)
- HOME Tenant Based Assistance (HTBA)
- Community Development Block Grant (CDBG)
- Community Services Block Grant (CSBG)
- Continuum of Care (CoC)
- Emergency Food and Shelter Program (EFSP)
- Supplemental Assistance for Facilities to Assist the Homeless Program (SAFAHP)
- Supplemental Nutrition Assistance Program (SNAP)
- Women Infants & Children nutrition program (WIC)
- US Housing & Urban Development Family Unification Voucher (HUDFUV)

3. What are some examples of Cash contributions that DO count towards MOE:

- Emergency Housing Assistance (EHA)
- Elderly Rental Assistance (ERA)
- State Homeless Assistance Program (SHAP)
- Private funds
- Foundation funds
- State funds (as qualified by #5 in this FAQ and not already counted by another source)
- Local government funds (as qualified by #5 in this FAQ and not already counted by another source)
- *IF YOU PLAN TO USE STATE OR LOCAL GOVERNMENT FUNDS, THESE FUNDS MUST NOT ALREADY BE COUNTED AS MOE BY ANOTHER SOURCE. PLEASE CONTACT THE SOURCE OF THESE FUNDS TO ENSURE THAT THEY ARE NOT ALREADY COUNTED AS MOE.*

4. What are some examples of In-Kind contributions that DO count towards MOE (funds not already counted by other sources, such as Oregon Food Bank, and with prior approval – see Section 4 of this manual):

- Volunteer driver hours
- Volunteer food pantry hours
- Other volunteer worker hours

5. What kinds of State expenditures count toward meeting a State's basic MOE expenditure requirement?

(a) Expenditures of State funds in TANF MOE may count if they are made for the following types of benefits or services:

(1) Cash assistance, including the State's share of the assigned child support collection that is distributed to the family, and disregarded in determining eligibility for, and amount of the TANF assistance payment;

(2) Child care assistance (see §263.3);

(3) Education activities designed to increase self-sufficiency, job training, and work (see §263.4);

(4) Any other use of funds allowable under section 404(a)(1) of the Act including:

(i) Nonmedical treatment services for alcohol and drug abuse and some medical treatment services (provided that the State has not commingled its MOE funds with Federal TANF funds to pay for the services), if consistent with the goals at §260.20 of this chapter [these services are not allowable with HSP]; and

(ii) Pro-family healthy marriage and responsible fatherhood activities enumerated in part IV-A of the Act, sections 403(a)(2)(A)(iii) and 403(a)(2)(C)(ii) that are consistent with the goals at §§260.20(c) or (d) of this chapter, but do not constitute “assistance” as defined in §260.31(a) of this chapter; and

(5)(i) Administrative costs for activities listed in paragraphs (a)(1) through (a)(4) of this section, not to exceed 15 percent of the total amount of countable expenditures for the fiscal year.

(ii) Costs for information technology and computerization needed for tracking or monitoring required by or under part IV-A of the Act do not count towards the limit in paragraph (5)(i) of this section, even if they fall within the definition of “administrative costs.”

(A) This exclusion covers the costs for salaries and benefits of staff who develop, maintain, support, or operate the portions of information technology or computer systems used for tracking and monitoring.

(B) It also covers the costs of contracts for the development, maintenance, support, or operation of those portions of information technology or computer systems used for tracking or monitoring.

(b) With the exception of paragraph (a)(4)(ii) of this section, the benefits or services listed under paragraph (a) of this section count only if they have been provided to or on behalf of eligible families. An “eligible family” as defined by the State, must:

(1) Be comprised of citizens or non-citizens who:

(i) Are eligible for TANF assistance;

(ii) Would be eligible for TANF assistance, but for the time limit on the receipt of federally funded assistance; or

(iii) Are lawfully present in the United States and would be eligible for assistance, but for the application of title IV of PRWORA;

(2) Include a child living with a custodial parent or other adult caretaker relative (or consist of a pregnant individual); and

(3) Be financially eligible according to the appropriate income and resource (when applicable) standards established by the State and contained in its TANF plan.

(c) Benefits or services listed under paragraph (a) of this section provided to a family that meets the criteria under paragraphs (b)(1) through (b)(3) of this section, but who became ineligible solely due to the time limitation given under §264.1 of this chapter, may also count.

(d) Expenditures for the benefits or services listed under paragraph (a) of this section count whether or not the benefit or service meets the definition of assistance under §260.31 of this chapter. Further, families that meet the criteria in paragraphs (b)(2) and (b)(3) of this section are considered to be eligible for TANF assistance for the purposes of paragraph (b)(1)(i) of this section.

(e) Expenditures for benefits or services listed under paragraph (a) of this section may include allowable costs borne by others in the State (e.g., local government), including cash donations from non-Federal third parties (e.g., a non-profit organization) and the value of third party in-kind contributions if:

(1) The expenditure is verifiable and meets all applicable requirements in 45 CFR 92.3 and 92.24;

(2) There is an agreement between the State and the other party allowing the State to count the expenditure toward its MOE requirement; and,

(3) The State counts a cash donation only when it is actually spent.

(f)(1) The expenditures for benefits or services in State-funded programs listed under paragraph (a) of this section count only if they also meet the requirements of §263.5.

(2) Expenditures that fall within the prohibitions in §263.6 do not count.

(g) State funds used to meet the Healthy Marriage Promotion and Responsible Fatherhood Grant match requirement may count to meet the MOE requirement in §263.1, provided the expenditure also meets all the other MOE requirements in this subpart.

6. When do child care expenditures count?

(a) State funds expended to meet the requirements of the CCDF Matching Fund (i.e., as match or MOE amounts) may also count as basic MOE expenditures up to the State's child care MOE amount that must be expended to qualify for CCDF matching funds.

(b) Child care expenditures that have not been used to meet the requirements of the CCDF Matching Fund (i.e., as match or MOE amounts), or any other Federal childcare program, may also count as basic MOE expenditures. The limit described in paragraph (a) of this section does not apply.

(c) The child care expenditures described in paragraphs (a) and (b) of this section must be made to, or on behalf of, eligible families, as defined in §263.2(b).

7. When do educational expenditures count?

(a) Expenditures for educational activities or services count if:

(1) They are provided to eligible families (as defined in §63.2(b)) to increase self-sufficiency, job training, and work; and

(2) They are not generally available to other residents of the State without cost and without regard to their income.

(b) Expenditures on behalf of eligible families for educational services or activities provided through the public education system do not count unless they meet the requirements under paragraph (a) of this section.

14. HSP REFERRAL TRACKING AND QUARTERLY PROVIDER REPORT

The HSP Referral Tracking and Quarterly Provider Report is available each biennium through the subgrantee's grant agreement/contract funding application and can be found on the OHCS website at: https://app.smartsheet.com/b/publish?EQBCT=8a215621578a4f76ae98113d719d5e64.

If any modifications to the template HSP Referral Tracking and Quarterly Provider Report are desired, they must be prior approved by OHCS before use. Subgrantees MUST NOT add any restrictions, protections or other permissions to the HSP Referral Tracking and Quarterly Provider Report. Any report submitted that has been altered in form or format and/or includes restriction, protections or permission will be returned to the subgrantee for correction and resubmission.

The deadline for submitting the report is not extended for reports submitted that do not meet OHCS requirements. If the report is submitted prior to the deadline, but is incomplete or requires correction, if such correction occurs after the deadline, the submission will be considered late by OHCS and not submitted within the requirements of the program.

There are no extensions for the submission of the HSP Referral Tracking and Quarterly Provider Report and complete and accurate reports must be submitted in form and format as required by OHCS by the due date, Oct 20, Jan 20, Apr 20 and Jul 20 of each fiscal year. See Section 9(B) of this manual for more information.