



# ANNUAL ACTION PLAN PORTLAND

## FY 2019-2020

*This FY 2019-2020 Portland Action Plan is the fourth Action Plan of the five-year Consolidated Plan. These plans are the federal application for federal housing and community economic development resources for the Portland Consortium of the City of Portland, City of Gresham, and Multnomah County. The Consolidated Plan is updated each year of the five years with an annual Action Plan for each jurisdiction.*

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# Executive Summary

## AP-05 Executive Summary - 91.200(c), 91.220(b)

### 1. Introduction

Since 1995, the U.S. Department of Housing and Urban Development (HUD) has required a single consolidated submission for the planning and applications aspects of the Community Development Block Grant (CDBG), Emergency Solutions Grant (ESG), HOME Investment Partnerships, and Housing Opportunities for Persons with Aids (HOPWA) formula programs. The multi-year Consolidated Plan and annual Action Plans have replaced the Comprehensive Housing Affordability Strategy (CHAS), the HOME program description, the Community Development plan and the CDBG final statement, and the ESG and HOPWA applications.

The City of Portland is the lead agent for the Consolidated Plan Consortium, which also includes the City of Gresham and Multnomah County. In accordance with HUD regulations, the Consolidated Plan Consortium is required to submit a Consolidated Plan every five years as a condition of receiving four Federal formula grants: Community Development Block Grant, HOME Investment Partnership Grant, Emergency Solution Grant and Housing Opportunities for Persons with AIDS. The Consolidated Plan contains a snapshot of the community's housing and community development needs, identifies local priorities, and establishes the strategies each jurisdiction will use to address those priority needs. The Consolidated Plan also includes five-year numeric goals; each jurisdiction will be expected to measure its progress against those goals in the Consolidated Annual Performance Report filed in the fall. The 2016-2020 Consolidated Plan will be the fifth, five-year plan. Consortium members also submit an annual Action Plan; Action Plan FY 2019-2020 will be submitted this year along with any updates to the Five-Year 2016-2020 Consolidated Plan.

### 2. Summarize the objectives and outcomes identified in the Plan

This could be a restatement of items or a table listed elsewhere in the plan or a reference to another location. It may also contain any essential items from the housing and homeless needs assessment, the housing market analysis or the strategic plan.

This could be a restatement of items or a table listed elsewhere in the plan or a reference to another location. It may also contain any essential items from the housing and homeless needs assessment, the housing market analysis or the strategic plan. The Consolidated Plan establishes local priorities, consistent with national objectives and priorities established by the US Department of Housing and Urban Development (HUD), to utilize funds allocated by CDBG, HOME, HOPWA and ESG programs. Over the five-year period covered by the 2016-2020 Consolidated Plan over \$75 million is expected to be

available through these programs, including allocations and program income. Each of the federal funding sources have specific program requirements that restrict eligible actions and projects. The Consolidated Plan is required to be formatted to answer specific questions by HUD about how these federal funds will be spent. The federal program objectives and local housing goals to meet those objectives, are listed below.

- CDBG Program Objectives: Provide decent housing; Create suitable living environments; Expand economic opportunity
- HOME Program Objectives; Expand the supply of decent, safe, sanitary and affordable housing.
- ESG Program Objective: Reduce and prevent homelessness.
- HOPWA Program Objective: Provide housing for persons with HIV/AIDS.

**Summary:** As determined in the Needs Assessment and Market Analysis included in this plan, the three broad needs and goals identified are described below:

**Affordable housing choice (Need); Increase and preserve affordable housing choice (Goal)** Affordable housing choice, includes safe housing, in good condition for all residents. Projects accomplishing this goal include home repair, down payment assistance, new housing development support, affordable housing development, rental housing rehabilitation and permanent supportive housing. In the Portland Action Plan the strategic actions call for more funding to be dedicated to housing development and preservation for households 0-60% MFI with a focus on 0-30% MFI households and necessary supportive services.

**Basic services & homeless prevention/intervention (Need); Reduce homelessness and increase stability (Goal)** This goal includes preventing and reducing homelessness and increasing stability for all residents. Projects accomplishing this goal include interventions across a broad spectrum, such as: supportive and emergency services, transitional housing, shelters, homelessness prevention through service interventions, Housing First models, Fair Housing enforcement and education, cultural and population appropriate program delivery and activities to increase self-sufficiency, e.g., job training, employment readiness and education.

**Community and economic development (Need); Infrastructure, facilities, economic opportunity (Goal)** This goal includes improving infrastructure, facilities, economic opportunities and economic development. Programs to improve employment outcomes and household economic stability include employment training, referral and self-sufficiency and economic enhancement programs. Projects accomplishing this goal include extensive work with infrastructure, which is seen in Portland, Gresham and Multnomah County as essential in encouraging stability in neighborhoods, increasing access to persons with disabilities and attracting and retaining businesses. Projects will also support micro-enterprises and business development, as well as, public facilities, parks and transportation improvements.

### **3. Evaluation of past performance**

This is an evaluation of past performance that helped lead the grantee to choose its goals or projects.

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Lack of affordable housing remains the leading community concern. While Portland has made significant investments in affordable housing there is still a demonstrated need to increase the housing stock and offer rental assistance. Over the last five years Portland has exceed housing production goals.

#### **Financial and budgetary impacts:**

This third year Action Plan of the Five Year Consolidated Plan will bring over \$17 million dollars in federal grant resources annually for housing, homelessness prevention and community economic development. The Consolidated Plan identifies three investment goals for federal funds. These three goals are:

- 1) Affordable housing choice (Need); Increase and preserve affordable housing choice (Goal)
- 2) Basic services & homeless prevention/intervention (Need); Reduce homelessness and increase stability (Goal)
- 3) Community and economic development (Need); Infrastructure, facilities, economic opportunity (Goal)

Over the last year and the last five year plan, the City of Portland has met or exceeded housing production and housing assistance goals as reported in the annual CAPER. Current projects and programs will be expanded when resources are available. New programming and services will be added for renters and low-income homeowners to prevent the economic displacement issues discussed during the Need Hearings.

### **4. Summary of Citizen Participation Process and consultation process**

Summary from citizen participation section of plan.

Summary from citizen participation section of plan.

The Consortia follows the federally required Community Participation Plan. This robust public participation strategy included several public hearings in advance of formal consideration and adoption by the jurisdictions. Three Need Hearings were held in the fall of 2018. They were announced in the Daily Journal of Commerce, Gresham Outlook and via the Consortium websites. Action Plan hearings

regarding goals, objectives and strategies were held in the spring. The Portland City Council Gresham City Council and Multnomah County Commissioners reviewed and approved the applications for PY 2019-20 federal funds. Approximately 20 community members were in attendance at each meeting. The Action Plans also respond to the Consolidated Plan public participation process. At the hearings and meetings were designed to reach a diverse range of people in terms of race, ethnicity, language, geography, income and culture. We met with low-income renters at their buildings, six linguistically specific groups were organized and several culturally specific groups met. Citizen participation was also encouraged through door knocking, four public meetings about barriers to Fair Housing, and a regional survey to a panel of over twenty thousand people. The Consolidated Plan focus groups included African Americans, Asian/Pacific Islanders, Hispanics and recent immigrant and refugee groups from Russia, Nepal, Burma, and Somalia. For the Need Hearings special attention was given to making the hearing accessible and known by non-English speaking citizens.

The City provided meeting and hearing notices, notice of the draft plans as required by the adopted Community Participation Plan, through a broad range of channels including culturally specific newspapers, newsletters, and emails to interest lists. were sent to several thousand partners and interested parties. Draft plans were made available online and paper version were upon request. The Portland Housing Advisory Committee (PHAC) notification lists to approximately 3,000 contacts and the Oregon Opportunity Network's newsletters were used to directly contact interested parties, partners and stakeholders. Notices were also posted on PHB's website, and printed in the DJC, and the Gresham Outlook, Asian Pages, Latino De Hoy and The Skanner.

The public involvement process is contained in the Citizen Participation Plan (CPP). The CPP is was adopted in the 2016-2020 Consolidated Plan. The public participation process for this Consolidated Plan follows the CPP guidelines. The current CPP is an exhibit of the current five-year Consolidated Plan and will guide the future public participation processes.

Staff also consulted local reports describing community and economic needs.

## **5. Summary of public comments**

This could be a brief narrative summary or reference an attached document from the Citizen Participation section of the Con Plan.

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Comments were made at the Housing Need Hearing and the Housing Action Plan hearings and summarized in the attached in the Public Comment section.

The testimony, as in past years called for more affordable housing and policies to preserve existing affordable housing options and housing policy that addresses barriers to housing choice for all protected classes. Visible homelessness was a top concern. At the Consolidated Plan and Action Plan hearings we heard that investing in housing for extremely low income households 0-30% MFI and protections for renters at risk of homelessness is especially critical. Community feedback in the form of testimony, focus groups and surveys, identified stagnant incomes, rising rents, credit screening and criminal background

screening, and no-fault evictions, as primary barriers to accessing housing. Participants also identified people most at risk of homelessness were people with low-incomes, mental or physical disabilities, people with addiction problems, and domestic violence survivors, LGBTQ identified, recent immigrants or refugees and people of color. Strategies suggested included culturally specific housing services tailored to the needs of these populations, reducing screening barriers, increasing the supply and location of affordable housing, and increasing household incomes.

The testimony at public hearings reaffirmed findings of the Consolidated Plan need assessment and market analysis, i.e. the need to have actions that address the impact of the rising rents on low-income households, the strong demand for short-term rent assistance, and the need to increase and preserve the number of units of affordable rental housing in the City especially those affordable to households 0-30% MFI. Another issue is the need to address the emerging specific needs of an aging population, and non-English-speaking communities. The social and economic impact of displacement and disparities in housing access for communities of color is also an area of concern.

Some needs described by community members require additional study, including ways to overcome denials due to income ratio guidelines, the need for large-family dwellings to house immigrant and refugee families, and for larger two-bathroom units for families that include persons with disabilities. Other needs will require longer-term planning efforts with other community partners, such as the need for LGBTQ-friendly assisted living facilities, LGBTQ friendly housing for youth at risk of homelessness, housing that addresses mental health needs, increasing homelessness among single women and families with children, criminal background denials, and the various changes to infrastructure needed to accommodate an aging population. PHB staff has raised these issues with Bureau of Planning & Sustainability staff in the Comprehensive Plan process.

Significant comments came from providers that serve people who have experienced domestic violence, and mental health issues. Other needs such as removing barriers to housing access for protected classes will require collective action, partnerships and policies. In the Fair Housing Assessment meetings, committee discussions and key informant interviews enhanced the Consortium's understanding of the nature and extent of housing discrimination today, and will contribute to the creation of a set of strategic recommendations to address barriers to Fair Housing access in the context of our three investment goals.

## **6. Summary of comments or views not accepted and the reasons for not accepting them**

No comments were not accepted. Comments were made at the Housing Need Hearing and the Housing Action Plan hearings and summarized in the attached in the Public Comment Exhibit.

## **7. Summary**

HUD regulations also require each Consortium receiving federal housing and community development funds to certify that it is affirmatively furthering fair housing. To ensure that the members of the Consortium are aware of the current level of bias and discrimination in the local housing market, the Consortium is required to submit an Assessment of Fair Housing (AFH) in 2020. Because of major changes in the housing market since 2011, the Portland Consortium will update the 2011 Analysis of Impediments to Fair Housing Choice (AI), within the first year of the 2016-2020 Consolidated Plan. The current 2011 AI describes the barriers to fair housing choice, which remain today, and includes recommendations for actions to address and eliminate them. Most of these recommendations are funded with local and federal resources. The federal funding priorities for Fair Housing are described in the FY 2019-20 Action Plan.

**PR-05 Lead & Responsible Agencies - 91.200(b)**

**1. Agency/entity responsible for preparing/administering the Consolidated Plan**

The following are the agencies/entities responsible for preparing the Consolidated Plan and those responsible for administration of each grant program and funding source.

<b>Agency Role</b>	<b>Name</b>	<b>Department/Agency</b>
CDBG Administrator	PORTLAND	Portland Housing Bureau
HOPWA Administrator	PORTLAND	Portland Housing Bureau
HOME Administrator	PORTLAND	Portland Housing Bureau
ESG Administrator	PORTLAND	Portland Housing Bureau

**Table 1 – Responsible Agencies**

**Narrative**

**Consolidated Plan Public Contact Information**



## **AP-10 Consultation - 91.100, 91.200(b), 91.215(l)**

### **1. Introduction**

This section outlines consultations with public and private agencies that provide housing, social and economic development services through State and local health and child welfare agencies, adjacent governments, HOPWA grantees, the public housing agency, Continuum of Care grantees, Emergency Solution Grant grantees, and public and private agencies concerning housing, and related social programs for homeless, victims of violence, unemployed and publicly funded institutions and systems of care that may discharge persons into homelessness, such as health-care facilities, mental health facilities, foster care, and corrections programs. The Portland Consortium includes representatives from the City of Portland, the City of Gresham and Multnomah County. They participate in regional planning efforts concerning all aspect of needs and opportunities covered by this Consolidated Plan, including economic development, transportation, public services, special needs, homelessness, and housing. Needs far exceed resources so the Consortium members have worked together to make decisions and set long-term priorities. Coordination within the Cities also consisted of input and review from the Portland Housing Advisory Commission, the Fair Housing Advocacy Committee, the Federal Funding Oversight Committee, the City of Gresham Community Development and Housing Subcommittee and the Multnomah County Policy Advisory Board. Coordination with Home Forward and Housing, service-providing agencies, and other stakeholders are described below. Their comments and input are reflected in discussions throughout this Consolidated Plan.

The Need Hearing and Action Plan outreach plan included several hearings and types of coordination with agencies. Coordination with corrections programs did not take place. There was coordination with FHCO, Home Forward, the Joint Office for Homeless Services regarding corrections ex-offender reentry housing issues. Business and Civic leaders and industry partners are typically contacted through email notices to over 3,000 individuals and organizations. Coordination took place on a regular basis through the quarterly meeting of the Fair Housing Advocacy Committee. This 18 member committee has representatives of owner associations, renter advocacy groups, Fair Housing advocates, social service providers, public and non-profit housing providers, the housing authority, government agencies such as the Joint Office of Homelessness and representatives from our culturally specific organizations. In addition to email notices, notices were published in the DJC, Portland Tribune, Asian Pages and Gresham Outlook. Gresham's 30-day comment period for the 18-19 Annual Action plan was from April 13-May 13. Notice was published in The Outlook on April 13, 2018 and the DJC 4/23/18. Notice was again published June 5th in the DJC related to public hearings. The City also posted on the City's web-page 4/13/18.

**Provide a concise summary of the jurisdiction's activities to enhance coordination between public and assisted housing providers and private and governmental health, mental health and service agencies (91.215(l)).**

Representatives of the Consortium of the City of Portland, City of Gresham and Multnomah County participate in regional planning efforts concerning all aspects of needs and opportunities covered by this Consolidated Plan, including housing, public services, homelessness, special needs, economic development and transportation. Significant resources are jointly planned and administered for homelessness prevention, emergency housing and supportive services. Coordination efforts and planning processes are reflected in discussions throughout this Consolidated Plan. In preparing the Consolidated Plan, the Consortium has consulted with other public and private agencies that provide assisted housing, health services and social services (including those focusing on services to children, elderly persons, persons with disabilities, persons with HIV/AIDS and their families and homeless persons).

These consultations have occurred in the course of regularly-occurring meetings of the Portland Housing Advisory Commission, A Home for Everyone coordinating board, the Fair Housing Advocacy Committee, Healthy Homes Coalition, Oregon Opportunity Network in special meetings and hearings sponsored by the City of Portland, the City of Gresham and Multnomah County and in specially noticed Consolidated Plan hearings. Consultation occurred with both housing and service providers; Home Forward (formerly Housing Authority of Portland); homeless persons; people with disabilities; and organizations that provide services to homeless families, people with alcohol or drug addictions, people with developmental disabilities, HIV affected families, the elderly, homeless adults, children and families and people with mental illness. Many provided additional testimony at the public hearings. (Please see Appendix A.)

The Consortium consulted with state and local health agencies regarding lead paint issues. Child welfare agencies do not have a role in lead hazard identification or abatement in Multnomah County. For this plan the Consortium met specifically, or within the course of everyday business, with each of the required public and private agencies.

**Describe coordination with the Continuum of Care and efforts to address the needs of homeless persons (particularly chronically homeless individuals and families, families with children, veterans, and unaccompanied youth) and persons at risk of homelessness.**

All three of our Consolidated Plan jurisdictions (Portland, Multnomah County, and Gresham) are represented on the Continuum of Care (CoC) Board (meets monthly) and its Executive Committee (meets quarterly.) The CoC coordinates with Consolidated Plan jurisdictions through meetings, calls and emails, to organize needs and Action Plan hearings and subcommittee to work on strategic planning, outreach, evaluation and system coordination. All of the jurisdictions support the Continuum's priorities focusing on the needs of the most vulnerable populations including chronically homeless persons, unaccompanied youth, families with children, and veterans, among others. The CoC is part of a

coordinated effort called “A Home for Everyone.” The A Home for Everyone Plan calls for assessment and rapid placement in appropriate housing, reducing vulnerability and increasing stability.

CoC goals from Consortium local homelessness plan align with our Consolidated Plan. Under the 2016-2020 Consolidated Plan, this primarily comes through coordination between the CoC needs assessments and strategic plan and the Consolidated Plan priority need #2 (Need for basic services and homelessness prevention and intervention) and goal #2 (Reduce homelessness and increase stability), though each of the Consolidated Plan priority needs and goals also aligns with CoC effort (especially those related to affordable housing production and preservation and economic opportunity). The CoC works with all three jurisdictions to engage consumers, neighborhoods and public agencies providing housing, health and social services (including health care agencies and the public housing authority.) The CoC specifically looks at the needs of homeless persons (particularly chronically homeless individuals and families, families with children, veterans, and unaccompanied youth) and persons at risk of homelessness. The CoC is working on a single point of entry system, it has been successful at addressing veteran homelessness, and the CoC is using its experience to address other special need homeless populations.

**Describe consultation with the Continuum(s) of Care that serves the jurisdiction’s area in determining how to allocate ESG funds, develop performance standards for and evaluate outcomes of projects and activities assisted by ESG funds, and develop funding, policies and procedures for the operation and administration of HMIS**

The Portland Consortium work closely with the Collaborative Applicant of the Continuum of Care (planning for allocation and use of Emergency Solutions Grant (ESG) funds). ESG policies and procedures were created and are updated periodically in cooperation with the Consortium. Guidelines ensure that ESG subrecipients are operating programs consistently across eligible activities. Performance is reviewed by all three entities. The Collaborative Applicant (City of Portland) is also the HMIS lead and works closely with Multnomah County to maximize use of HMIS resources and to draw data for reports on project performance and program outcomes.

The CoC actively solicits and integrates ESG recipient participation in planning, evaluation & reporting. The Portland Housing Bureau (PHB) staffs the CoC Board and is also an ESG grantee and lead agency for the CoC and Portland Consolidated Plan. The CoC gathers input from ESG recipients through subcommittees, including the data & evaluation subcommittee, to assess needs and guide ESG funding decisions to more effectively end homelessness. Our CoC currently directs ESG to expand capacity of the regional Short Term Rent Assistance program and operate emergency shelter closely aligned with locally- and CoC-funded housing resources. PHB monitors ESG recipients and evaluates project performance using CoC-developed housing placement outcomes collected in the regional homeless management information system (HMIS). Data is analyzed from project-level outcomes, system-wide point-in-time counts of homelessness and HMIS reports and ESG recipient feedback, and ESG-specific

policies and procedures are included in the CoC's adopted HMIS policies and procedures. The CoC's data & evaluation subcommittee evaluates outcomes to provide direction for project- and system-level performance improvements.

The responsibility for implementing the Plan will rest with the Portland Housing Bureau, Gresham's Community Development Department, Multnomah County Department of Human Services and Home Forward. However, implementation cannot proceed without the involvement and support of several public and private agencies. The following list describes the various institutions, businesses and agencies responsible for the delivery of housing and economic opportunity services in the region. Each description of a product and market segment is not intended to be a complete account of activities for each entity.

## **2. Agencies, groups, organizations and others who participated in the process and consultations**

**Table 2 – Agencies, groups, organizations who participated**

1	<b>Agency/Group/Organization</b>	City of Gresham
	<b>Agency/Group/Organization Type</b>	Services - Housing Other government - Local
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Portland Consortium partner. City of Gresham staff coordinate and consult with the Portland Consortium regarding these plans.
2	<b>Agency/Group/Organization</b>	MULTNOMAH COUNTY
	<b>Agency/Group/Organization Type</b>	Other government - County
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Portland Consortium partner. Multnomah County staff coordinate and consult with the Portland Consortium regarding these plans.
3	<b>Agency/Group/Organization</b>	Home Forward
	<b>Agency/Group/Organization Type</b>	PHA
	<b>What section of the Plan was addressed by Consultation?</b>	Public Housing Needs
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Portland Consortium partner. Home Forward staff coordinate and consult with the Portland Consortium regarding these plans.
4	<b>Agency/Group/Organization</b>	Joint Office of Homeless Services
	<b>Agency/Group/Organization Type</b>	Other government - County

	<b>What section of the Plan was addressed by Consultation?</b>	Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy HOPWA Strategy
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Portland Consortium partner. Joint Office of Homeless services staff coordinate and consult with the Portland Consortium regarding these plans. This office is jointly funded and led by Multnomah County and the City of Portland.
5	<b>Agency/Group/Organization</b>	El Programa Hispano Catolico
	<b>Agency/Group/Organization Type</b>	Services - Housing Regional organization Neighborhood Organization
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Homeless Needs - Families with children Economic Development Anti-poverty Strategy
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	El Programa Hispano Catolico was consulted through Gresham and the Fair Housing Advocacy Committee.
6	<b>Agency/Group/Organization</b>	AFRICAN AMERICAN ALLIANCE FOR HOMEOWNERSHIP
	<b>Agency/Group/Organization Type</b>	Services - Housing Neighborhood Organization
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Anti-poverty Strategy

	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The African American Alliance for Homeownership was consulted for housing actions.
7	<b>Agency/Group/Organization</b>	NATIVE AMERICAN YOUTH ASSOCIATION
	<b>Agency/Group/Organization Type</b>	Services - Housing Regional organization Neighborhood Organization
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Economic Development Anti-poverty Strategy
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Native American Youth and Family Services was consulted for housing, employment and economic development.
8	<b>Agency/Group/Organization</b>	INTERNATIONAL REFUGEE CENTER OF OREGON
	<b>Agency/Group/Organization Type</b>	Services - Housing Regional organization Neighborhood Organization
	<b>What section of the Plan was addressed by Consultation?</b>	Homeless Needs - Chronically homeless Homeless Needs - Families with children Non-Homeless Special Needs Economic Development Anti-poverty Strategy

	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The International Refugee Center was consulted for housing actions.
9	<b>Agency/Group/Organization</b>	Community Alliance of Tenants
	<b>Agency/Group/Organization Type</b>	Services - Housing Regional organization Grantee Department Neighborhood Organization
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Non-Homeless Special Needs Anti-poverty Strategy
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Community Alliance of Tenants was consulted for housing actions.

**Identify any Agency Types not consulted and provide rationale for not consulting**

**Other local/regional/state/federal planning efforts considered when preparing the Plan**

<b>Name of Plan</b>	<b>Lead Organization</b>	<b>How do the goals of your Strategic Plan overlap with the goals of each plan?</b>
Continuum of Care	Office of Joint Homeless Services	ultnomah County and the City of Portland jointly plan and implement housing and services for people at risk of homelessness.
Comprehensive Plan	Bureau of Planning and Sustainability	The Comprehensive plan is a 20 year plan to accommodate future population growth. These plans are expected to complement each other
Moving To Work	Home Forward	The Housing Authority Plan outlines strategies to overcome barriers to housing stability



Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
2011 Analysis of Impediments to Fair Housing	Portland Housing Bureau	Strategies to address displacement, and housing discrimination barriers to housing choice.
A Home For EveryoneL A United Community Plan	Joint Office of Homeless Services	Affordable housing choice (Need); Increase and preserve affordable housing choice (Goal)Basic services & homeless prevention/intervention (Need
Community Economic Development Plan	Prosper Portland	Community and economic development (Need); Infrastructure, facilities, economic opportunity (Goal)

**Table 3 – Other local / regional / federal planning efforts**

**Narrative**

**Joint Office of Homeless Services**

In FY 2016-17, the City of Portland and Multnomah County together invested \$47.3 million to create a new Joint Office of Homeless Services, combining resources to achieve an ambitious goal established by the A Home for Everyone(AHFE) collaborative: reduce by half Portland’s unmet housing need by June 2017. The goal was premised on 2015Homeless Point in Time count data; the 2017 Homeless Point in Time count will provide updated data to better understand the progress made towards this goal as well as current system needs and trends. The 2017 count was completed in February and the results were published in 2018. Now the Joint Office is preparing for the 2019 PIT.

## **AP-12 Participation - 91.401, 91.105, 91.200(c)**

### **1. Summary of citizen participation process/Efforts made to broaden citizen participation Summarize citizen participation process and how it impacted goal-setting**

For the Need Hearings special attention was given to making the hearing accessible and known by non-English speaking citizens.

The City provided meeting and hearing notices, notice of the draft plans as required by the adopted Community Participation Plan, through a broad range of channels including newspapers and emails to interested parties. Draft plans were made available online and paper version was available at the Portland Housing Bureau upon request. Notices were also posted on PHB's website, and printed in the DJC, and the Gresham Outlook, Asian Pages, Latino De Hoy and The Skanner.

The Consortia follows the federally required Community Participation Plan. This robust public participation strategy included several public hearings in advance of formal consideration and adoption by the jurisdictions. A preliminary draft was made available April 13th, 2018 and the public hearings regarding goals, objectives and strategies were held March 23 and May 9th, 2018 for Multnomah County, May 17th for the City of Gresham and June 5th for the City of Portland. The Portland City Council reviewed the Action Plan projects June 27th. Gresham City Council reviewed their third-year Action Plan June 19th and Multnomah County Commissioners reviewed their third-year Multnomah County Action Plan June 28th. The Action Plans are also informed by the initial Five-Year Consolidated Plan planning meetings that included three Fair Housing information meetings, and over ten focus groups with specific cultural, language and geographic communities.

The City of Portland, City of Gresham and Multnomah County conducted joint Community Need Hearings in the Fall of 2018. The first hearing was designed to reach community members whose primary language was Spanish. The second hearing facilitated by the Portland Housing Bureau, conducted on November 15 was directed to all residents of Portland. The third hearing, sponsored by Gresham and Multnomah County was directed to Gresham and East County as a whole. Comments about Community Need were varied. Many of the comments were focused in affordable housing, lack mental health services, senior housing, micro-enterprise and the need for more youth programs. The group described the need for habitability, affordability and tenant rights, on rental housing challenges and skill development for living wage employment. Transportation challenges in Gresham and East County were highlighted because many felt public transportation was inadequate for the growing population in the area.

Comment also expressed concerns for infrastructure improvements that support community safety – sidewalks, street lighting, etc.

The public involvement process is contained in the Citizen Participation Plan (CPP). The CPP is was adopted in the 2016-2020 Consolidated Plan. The public participation process for this Consolidated Plan follows the CPP guidelines. The current CPP is an exhibit of the current five-year Consolidated Plan and will guide the future public participation processes.

Staff also consulted local reports describing community and economic needs

## Citizen Participation Outreach

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
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1	Public Meeting	<p>Minorities</p> <p>Non-English Speaking - Specify other languages: Fliers in various languages</p> <p>Persons with disabilities</p> <p>Non-targeted/broad community</p> <p>Residents of Public and Assisted Housing</p>	<p>There were approximately 60 attendees for the joint Gresham/Multnomah County needs assessment meetings, and an additional 30 at the Portland Need hearing in East Multnomah County. The hearings were held 10/26/17, 11/2/17, and 11/8/17. <a href="https://www.portlandoregon.gov/phb/article/660556">https://www.portlandoregon.gov/phb/article/660556</a></p>	<p>Although comments were varied, most attendees cited the lack of affordable housing as the primary issue. Additionally, there was much discussion about the lack of services (mental health and youth) and lighting and sidewalks.</p>	<p>No comments were not accepted.</p>	<p><a href="https://www.portlandoregon.gov/phb/article/660552">https://www.portlandoregon.gov/phb/article/660552</a></p>
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**Table 4 – Citizen Participation Outreach**

## Expected Resources

### AP-15 Expected Resources - 91.420(b), 91.220(c)(1,2)

#### Introduction

Funding in the first year is based on FY 2016-17 allocations. The City of Portland is using its financial forecast to estimate the expected amount available for the upcoming four years. Assumptions for entitlements are that they will be stable for the next four years.

HOPWA 2015 projects ended with \$32,517 unspent. However, we are not allowed in IDIS to spend 2015 money in a 2016 project. This money is currently unallocated and will be allocated to a 2015 project later in the year. We are removing it from the expected resources since it cannot be



tied to an AP-35 project. Same situation with ESG in the amount of \$12,265.

**Anticipated Resources**

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	8,509,881	1,025,000	5,135,039	14,669,920	11,159,278	Rental Housing Development, Administration and Fair Housing, Workforce Development and Microenterprise, Homeowner Services. Added 800,000 in program income and Section 108 program income on 5/26/17.

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
HOME	public - federal	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA	3,665,146	841,800	4,545,280	9,052,226	3,868,023	Rental Development, Administration, Homebuyer, TBRAAmendment #2 added program income for Gresham

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
HOPWA	public - federal	Permanent housing in facilities Permanent housing placement Short term or transitional housing facilities STRMU Supportive services TBRA	1,592,044	0	0	1,592,044	1,092,000	HOPWA Services

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
ESG	public - federal	Conversion and rehab for transitional housing Financial Assistance Overnight shelter Rapid re-housing (rental assistance) Rental Assistance Services Transitional housing	728,939	0	0	728,939	728,939	Shelter Services, Rapid Rehousing
Competitive McKinney-Vento Homeless Assistance Act	public - federal	Admin and Planning Other	245,666	0	0	245,666	245,666	HMIS program including information system development and administration

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
General Fund	public - local	Admin and Planning Financial Assistance Homebuyer assistance Homeowner rehab Overnight shelter Public Services Rapid re-housing (rental assistance) Rental Assistance Supportive services TBRA	51,930,314	0	0	51,930,314	42,293,193	Administrative costs funded by the City General Fund includes fair housing, A Home For Everyone includes emergency shelter operations, supportive housing services, permanent housing placement, rent assistance, Down Payment Assistance and Home Repair

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
Tax Increment Financing	public - local	Admin and Planning Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab	65,124,752	0	0	65,124,752	65,202,130	Program Administration for Portland Housing Bureau, Preservation and New Affordable Housing, Down Payment Assistance and Home Repair.
Other	public - federal	Admin and Planning	13,000	0	0	13,000	13,000	Multnomah County and Gresham pay the City of Portland to coordinate our consolidated plan process.
Other	public - federal	Homeowner rehab Multifamily rental rehab Other	1,747,000	0	0	1,747,000	955,938	Lead Hazard Control Demonstration Grant 2013 has been renewed.

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
Other	public - local	Acquisition Admin and Planning Multifamily rental new construction Multifamily rental rehab	23,819,468	0	0	23,819,468	98,269,436	The Housing Investment Fund is a local resource comprising several programs largely dedicated to housing development.

Table 2 - Expected Resources – Priority Table

**Explain how federal funds will leverage those additional resources (private, state and local funds), including a description of how matching requirements will be satisfied**

The Consortium leverages HUD funds with a variety of local public, as well as private dollars, for housing and community development activities. Some of the leverage includes local Tax Increment Financing, for projects that leveraged non-local funding sources such as Low-Income Housing Tax Credits, State and County funding, and private resources units targeted at low and very low income households. Housing development and rehabilitation activities are highly leveraged because public funds are used as "last in" gap financing amounts. Locally controlled direct subsidy dollars are provided as loans and grants for rental housing.

In the months and years ahead, community-wide efforts will continue to move forward to find increased opportunities to leverage and better align economic opportunity resources with housing resources to support our communities' residents experiencing homelessness and housing instability. Leverage includes in kind and private sources.

HOME Match:

Matching funds estimated to equal \$916,287 are required for the HOME program. The members of the HOME consortium will each contribute their *pro rata* share of match. Key sources of match are expected to include local Tax Increment funds; local General Funds; grant funds from the State Housing Trust Fund, value of below market financing using the Oregon Affordable Housing Tax Credit; value of donated property and donated labor; the value of property tax exemptions for low- and moderate-income home ownership properties developed in distressed neighborhoods; the value of property tax exemptions for low and moderate-income rental housing owned by charitable nonprofits and rented to income-qualified tenants; the value of property tax exemptions for low- and moderate-income housing developed under the New Multi-Unit Housing program; the value of building permit fee waivers and system development charge waivers; and the value of contributions from charitable and corporate sources. Although General Fund match may be available, federal regulations do not require a General Fund match for the HOME grant.

ESG Match: Dollar-for-dollar matching funds are required for the ESG program. The source of the \$728,939 match is expected to be General Fund allocated in the Portland Housing Bureau budget to Housing Access & Stabilization programs benefitting people experiencing homelessness.



**If appropriate, describe publically owned land or property located within the jurisdiction that may be used to address the needs identified in the plan**

More efforts are being made to identify vacant land owned by the City of Portland, Portland Development Commission, State of Oregon, Multnomah County, and agencies within these jurisdiction that would be appropriate for affordable housing, in-kind leverage, or as another resources for affordable housing. Publically and privately owned buildings, institutions and churches are also identified for temporary housing and shelter partnerships.

**Discussion**

These revenue estimates are based on FY 2019-20 budget projections, FY 2019-20 federal allocation and actual program income from FY 2018-19.

## **Annual Goals and Objectives**

### **AP-20 Annual Goals and Objectives - 91.420, 91.220(c)(3)&(e)**

### Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Increase and preserve affordable housing choice	2016	2020	Affordable Housing Public Housing	Citywide	Affordable Housing Choice	CDBG: \$11,621,272 HOME: \$9,052,226	Public service activities other than Low/Moderate Income Housing Benefit: 1500 Persons Assisted Public service activities for Low/Moderate Income Housing Benefit: 650 Households Assisted Rental units constructed: 100 Household Housing Unit Rental units rehabilitated: 150 Household Housing Unit Homeowner Housing Added: 10 Household Housing Unit Homeowner Housing Rehabilitated: 400 Household Housing Unit Direct Financial Assistance to Homebuyers: 5 Households Assisted Tenant-based rental assistance / Rapid Rehousing: 150 Households Assisted Businesses assisted: 2 Businesses Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
2	Prevent/reduce homelessness and increase stability	2016	2020	Affordable Housing Public Housing Homeless Non-Homeless Special Needs	Citywide	Basic Services, homelessness prevention/intervene	HOPWA: \$1,592,044 ESG: \$728,939	Overnight/Emergency Shelter/Transitional Housing Beds added: 2300 Beds Housing for People with HIV/AIDS added: 84 Household Housing Unit
3	Infrastructure, facilities and economic opportunit	2016	2020	Non-Housing Community Development	Citywide	Community Economic Development	CDBG: \$2,292,648	Public service activities other than Low/Moderate Income Housing Benefit: 1660 Persons Assisted Rental units constructed: 1 Household Housing Unit Businesses assisted: 250 Businesses Assisted

Table 3 – Goals Summary

### Goal Descriptions

1	<b>Goal Name</b>	Increase and preserve affordable housing choice
	<b>Goal Description</b>	<p>Increase and preserve affordable housing choice. Affordable housing choice, includes safe housing, in good condition for all residents. Projects accomplishing this goal include home repair, down payment assistance, support for new housing development, affordable housing development, rental housing rehabilitation and permanent supportive housing.</p> <p><u>One Year Outcomes</u></p> <p>Program Delivery CDBG - 250 Housing Units</p> <p>Public Service Other than low/mod ( housing counseling 05U, and PR-23 CDBG): 1500 persons assisted</p> <p>Public Service Low/mod (05RDPAL and 05JFair Housing, PR23 CDBG): 650 households assisted(includes relocation 35 per year)</p> <p>Rental Units Constructed (12 Construction of Housing, PR23 HOME, PR23 CDBG, PR11, PR22,): 100 household housing unit</p> <p>Rental Unit Rehabilitated(14B Rehab Multi Unit Residential , PR23 CDBG): 150 Household Housing Unit</p> <p>Direct Financial Assistance to Homeowners, Housing Added (13 Direct Homeownership Assistance, PR23 CDBG): 10 household Housing Unit</p> <p>Homeowner Housing rehabilitated (14A Rehab single unit residential, 14F Energy efficiency improve, PR23 CDBG) : 400 household housing unit</p> <p>Direct Financial Assistance to Homeowners(13 Direct Homeownership Assistance, PR23 HOME): 5 household Housing Unit- Multnomah County</p> <p>Tenant Based Rental Assistance/Rapid rehousing (TBRA, SAGE-RRH, CAPER-HOPWA, PR 23HOME): 150 households assisted</p>

2	<b>Goal Name</b>  <b>Goal Description</b>	Prevent/reduce homelessness and increase stability  Reduce homelessness and increase stability. This goal includes preventing and reducing homelessness and increasing stability for all residents. Projects accomplishing this goal include interventions across a broad spectrum, such as: supportive and emergency services, transitional housing, shelters, homelessness prevention through service interventions, Housing First models, Fair Housing enforcement and education, cultural and population appropriate program delivery and activities to increase self-sufficiency, e.g., job training, employment readiness and education.  <u>One Year Outcome Targets</u>  Public Facility or Infrastructure for low/mod Income Housing Benefit (permanent housing facilities HOPWA report): 84 households assisted  Housing for persons with AIDS Housing Operations and housing units  Overnight/emergency Shelter. transitional housing beds added (Emergency Shelter, SAGE): 2,300 beds
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3	<b>Goal Name</b>	Infrastructure, facilities and economic opportunit
	<b>Goal Description</b>	<p>Community economic development.</p> <p>This goal includes improving infrastructure, facilities, economic opportunities and economic development. Programs to improve employment outcomes and household economic stability include employment training, referral and self-sufficiency and economic enhancement programs. Projects accomplishing this goal include extensive work with infrastructure, which is seen in Portland, Gresham and Multnomah County as essential in encouraging stability in neighborhoods, increasing access to persons with disabilities and attracting and retaining businesses. Projects will also support micro-enterprises and business development, as well as, public facilities, parks and transportation improvements.</p> <p><u>One Year Outcomes</u></p> <p>Business assisted (18C, PR23 CHDOs): 250 Businesses Assisted</p> <p>Public Service Activities other than low/mod income housing benefit Services (Employment Training PR23): 1,660 Individuals</p>

## AP-35 Projects - 91.420, 91.220(d)

### Introduction

The 2019 Annual Action Plan outlines projects meeting needs identified in the 2016-2020 Consortium Consolidated Plan, opportunities in Potland and City priorities. Initial project recommendations were made in consultation with the Portland Housing Advisory Commission which serves as the Portland Housing Bureau budget advisory committee. Part of the review process was consideration of the ability of local and regional agencies and partners to successfully achieve objectives and administrative demands, including monitoring. The City Council made the final decisions on projects.

The projects attached to this action plan are broad categories based on Portland's requested budget. They will be broken down into specific subrecipient contracts, as applicable, at a later point in the process based on programs and projects approved in the city budget process.

Please note that 2019 HOPWA and 2019 ESG carryover will be allocated to existing 2019 projects from the last action plan due to the requirements of IDIS grant based accounting.

#	Project Name
1	FY 19-20 Program Administration -CDBG
2	FY 19-20 Program Delivery -CDBG
3	FY 19-20 Program Administration-HOME
4	FY 19-20 ESG
5	FY 19-20 Program Administration -HOPWA
6	FY 19-20 Fair Housing Admin. CDBG
7	FY 19-20 Section 108 Repayment
8	FY 19-20 Economic Opportunity Initiative -Microenterprize
9	FY 19-20 Economic Opportunity Initiative Adult/Youth Workforce
10	FY 19-20 Housing Development Center
11	FY 19-20 New Affordable Rental Housing
12	FY 19-20 Preservation Affordable Housing
13	FY 19-20 HOME Consotium Gresham
14	FY 19-20 Home Consortium Multnomah County
15	FY 19-20 Single Family Homebuyer Financial Assistance
16	FY 19-20 Single Family Home Repair
17	FY 19-20 Home CHDO operating contracts
18	FY 19-20 HOPWA Subcontracts
19	Carryover Affordable Housing FY 18-19
20	FY 19-20 Housing Counseling and Assistance



#	Project Name
21	FY 19-20 Tenant Based Rent Assistance

**Table 4 – Project Information**

**Describe the reasons for allocation priorities and any obstacles to addressing underserved needs**

The City of Portland chose to allocate our CDBG and HOME dollars primarily to rental housing development, because there is a current housing state of emergency in the city of Portland as well as our surrounding HOME consortium members, city of Gresham and unincorporated Multnomah County. The City has also devoted significant local resources to homelessness access and stabilization as well as tenant based rental assistance. We will continue to use CDBG resources for our economic opportunity initiative focusing on microenterprise technical assistance and workforce development.

The Consortium leverages HUD funds with a variety of local public, as well as private dollars, for housing and community development activities. Some of the leverage includes local Tax Increment Financing, for projects that leveraged non-local funding sources such as Low-Income Housing Tax Credits, State and County funding, and private resources units targeted at low and very low income households. Housing development and rehabilitation activities are highly leveraged because public funds are used as "last in" gap financing amounts. Locally controlled direct subsidy dollars are provided as loans and grants for rental housing.

In the months and years ahead, community-wide efforts will continue to move forward to find increased opportunities to leverage and better align economic opportunity resources with housing resources to support our communities’ residents experiencing homelessness and housing instability. Leverage includes in kind and private sources.

If appropriate, describe publically owned land or property located within the jurisdiction that may be used to address the needs identified in the plan

More efforts are being made to identify vacant land owned by the City of Portland, Portland Development Commission, State of Oregon, Multnomah County, and agencies within these jurisdiction that would be appropriate for affordable housing, in-kind leverage, or as another resources for affordable housing. Publically and privately owned buildings, institutions and churches are also identified for temporary housing and shelter partnerships.

Discussion

These revenue estimates are based on FY 2018-19 budget projections, FY 2019-20 federal allocation and actual program income from FY 2018-19. As in past years at least 90% of the beneficiaries are anticipated to be low-income. Ninety percent of the City of Portland's Housing portfolio serves households 0 - 60% of the median family income through rent restrictions. Of the 13,197 assisted units, 2,112 of those units

are restricted to households earning 0-30% of the area median income.

**AP-38 Project Summary**  
**Project Summary Information**

<b>1</b>	<b>Project Name</b>	FY 19-20 Program Administration -CDBG
	<b>Target Area</b>	Citywide
	<b>Goals Supported</b>	Increase and preserve affordable housing choice
	<b>Needs Addressed</b>	Affordable Housing Choice
	<b>Funding</b>	CDBG: \$1,323,401
	<b>Description</b>	Includes Personnel, indirect costs, grants office 1/A
	<b>Target Date</b>	6/30/2020
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	NA
	<b>Location Description</b>	
	<b>Planned Activities</b>	
<b>2</b>	<b>Project Name</b>	FY 19-20 Program Delivery -CDBG
	<b>Target Area</b>	Citywide
	<b>Goals Supported</b>	Increase and preserve affordable housing choice
	<b>Needs Addressed</b>	Affordable Housing Choice
	<b>Funding</b>	CDBG: \$538,242
	<b>Description</b>	Personnel, HIPP< NHP, EOI
	<b>Target Date</b>	6/30/2020
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	250 housing units
	<b>Location Description</b>	
	<b>Planned Activities</b>	
<b>3</b>	<b>Project Name</b>	FY 19-20 Program Administration-HOME
	<b>Target Area</b>	Citywide
	<b>Goals Supported</b>	Increase and preserve affordable housing choice
	<b>Needs Addressed</b>	Affordable Housing Choice

	<b>Funding</b>	HOME: \$445,818
	<b>Description</b>	HOME Admin
	<b>Target Date</b>	6/30/2020
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	NA
	<b>Location Description</b>	
	<b>Planned Activities</b>	
4	<b>Project Name</b>	FY 19-20 ESG
	<b>Target Area</b>	Citywide
	<b>Goals Supported</b>	Prevent/reduce homelessness and increase stability
	<b>Needs Addressed</b>	Basic Services, homelessness prevention/intervene
	<b>Funding</b>	ESG: \$728,939
	<b>Description</b>	Must be combined in single project per HESG rules
	<b>Target Date</b>	6/30/2020
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	2300 shelter beds for homeless households. Must be combined in single project per HESG rules
	<b>Location Description</b>	
	<b>Planned Activities</b>	
5	<b>Project Name</b>	FY 19-20 Program Administration -HOPWA
	<b>Target Area</b>	Citywide
	<b>Goals Supported</b>	Prevent/reduce homelessness and increase stability
	<b>Needs Addressed</b>	Basic Services, homelessness prevention/intervene
	<b>Funding</b>	HOPWA: \$47,761
	<b>Description</b>	HOPWA Admin
	<b>Target Date</b>	6/30/2020

	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	NA
	<b>Location Description</b>	
	<b>Planned Activities</b>	
6	<b>Project Name</b>	FY 19-20 Fair Housing Admin. CDBG
	<b>Target Area</b>	Citywide
	<b>Goals Supported</b>	Increase and preserve affordable housing choice
	<b>Needs Addressed</b>	Affordable Housing Choice
	<b>Funding</b>	CDBG: \$715,000
	<b>Description</b>	includes subrecipient and other budget items. Address barriers to housing access and opportunity.
	<b>Target Date</b>	6/30/2020
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	650 households assisted
	<b>Location Description</b>	
	<b>Planned Activities</b>	Fair Housing enforcement, advocacy, education, and outreach. Rental services that enhance access and opportunity for low-income and protected class renters.
7	<b>Project Name</b>	FY 19-20 Section 108 Repayment
	<b>Target Area</b>	Citywide
	<b>Goals Supported</b>	Increase and preserve affordable housing choice
	<b>Needs Addressed</b>	Affordable Housing Choice
	<b>Funding</b>	CDBG: \$756,000
	<b>Description</b>	Pay as possible out of Section 108 program income. Repayment of section 108 loan guarantee program
	<b>Target Date</b>	6/30/2020

	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	NA
	<b>Location Description</b>	repayment
	<b>Planned Activities</b>	repayment of Section 108 loan
8	<b>Project Name</b>	FY 19-20 Economic Opportunity Initiative -Microenterprize
	<b>Target Area</b>	Citywide
	<b>Goals Supported</b>	Infrastructure, facilities and economic opportunit
	<b>Needs Addressed</b>	Community Economic Development
	<b>Funding</b>	CDBG: \$547,356
	<b>Description</b>	EOI with PDC and subcontractors
	<b>Target Date</b>	6/30/2020
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	250 businesses
	<b>Location Description</b>	
	<b>Planned Activities</b>	Micro enterprise lending to small businesses.
9	<b>Project Name</b>	FY 19-20 Economic Opportunity Initiative Adult/Youth Workforce
	<b>Target Area</b>	Citywide
	<b>Goals Supported</b>	Infrastructure, facilities and economic opportunit
	<b>Needs Addressed</b>	Community Economic Development
	<b>Funding</b>	CDBG: \$1,733,292
	<b>Description</b>	EOI with PDC and subcontractors
	<b>Target Date</b>	6/30/2020
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	adult and youth job training for 1660 persons assisted

	<b>Location Description</b>	
	<b>Planned Activities</b>	adult and youth employment and training.
<b>10</b>	<b>Project Name</b>	FY 19-20 Housing Development Center
	<b>Target Area</b>	Citywide
	<b>Goals Supported</b>	Infrastructure, facilities and economic opportunit
	<b>Needs Addressed</b>	Community Economic Development
	<b>Funding</b>	CDBG: \$12,000
	<b>Description</b>	FY19-20 Housing Development Center
	<b>Target Date</b>	6/30/2020
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	technical assistance for Community Housing Development Organizations
	<b>Location Description</b>	Citywide agencies.
	<b>Planned Activities</b>	This is an administrative and training resources for housing development partners.
<b>11</b>	<b>Project Name</b>	FY 19-20 New Affordable Rental Housing
	<b>Target Area</b>	Citywide
	<b>Goals Supported</b>	Increase and preserve affordable housing choice
	<b>Needs Addressed</b>	Affordable Housing Choice
	<b>Funding</b>	CDBG: \$1,744,971 HOME: \$5,500,000 Tax Increment Financing: \$65,124,752
	<b>Description</b>	New rental housing development
	<b>Target Date</b>	6/30/2020
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	125 housing units other than low/mod. New affordable housing rental development projects. Newly affordable units both HOME and CDBG. Over 90% of the City of Portland's housing portfolio serves households below 60% MFI and 16% of those projects are restricted to households below 30% MFI



	<b>Location Description</b>	These resources will be deployed citywide. Projects are chosen based on qualifications and competitive procedures. Some projects are location restricted if the primary source of financing is a Tax Increment Finance grant or another geographically restricted source of project funding.
	<b>Planned Activities</b>	New Rental Housing
<b>12</b>	<b>Project Name</b>	FY 19-20 Preservation Affordable Housing
	<b>Target Area</b>	Citywide
	<b>Goals Supported</b>	Increase and preserve affordable housing choice
	<b>Needs Addressed</b>	Affordable Housing Choice
	<b>Funding</b>	:
	<b>Description</b>	rental Housing rehabilitation and preservation
	<b>Target Date</b>	6/30/2020
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	The goal is 150 units
	<b>Location Description</b>	citywide with a focus on East Portland.
<b>Planned Activities</b>	No activities are planned for this year.	
<b>13</b>	<b>Project Name</b>	FY 19-20 HOME Consotium Gresham
	<b>Target Area</b>	
	<b>Goals Supported</b>	Increase and preserve affordable housing choice
	<b>Needs Addressed</b>	Affordable Housing Choice
	<b>Funding</b>	HOME: \$964,169
	<b>Description</b>	Home Consortium Gresham
	<b>Target Date</b>	6/30/2020
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Assist 125 households .

	<b>Location Description</b>	City Of Gresham
	<b>Planned Activities</b>	Preservation of affordable housing rental units. Preservation of affordable units
<b>14</b>	<b>Project Name</b>	FY 19-20 Home Consortium Multnomah County
	<b>Target Area</b>	Citywide
	<b>Goals Supported</b>	Increase and preserve affordable housing choice
	<b>Needs Addressed</b>	Affordable Housing Choice
	<b>Funding</b>	HOME: \$444,691
	<b>Description</b>	buy down affordability in 1-5 Permanently supportive housing units.
	<b>Target Date</b>	6/30/2020
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	5 households. As per consortium IGA. Projects to be approved by Multnomah County.
	<b>Location Description</b>	Multnomah County
	<b>Planned Activities</b>	buydown the cost of units in Multnomah County to make 1-5 units permanently supportive housing.
<b>15</b>	<b>Project Name</b>	FY 19-20 Single Family Homebuyer Financial Assistance
	<b>Target Area</b>	Citywide
	<b>Goals Supported</b>	Increase and preserve affordable housing choice
	<b>Needs Addressed</b>	Affordable Housing Choice
	<b>Funding</b>	CDBG: \$544,000
	<b>Description</b>	Direct financial assistance to first time homebuyers with the goal of closing the minority homeownership gap.
	<b>Target Date</b>	6/30/2020
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	10 households
	<b>Location Description</b>	Citywide

	<b>Planned Activities</b>	Direct financial first time homebuyer assistance
16	<b>Project Name</b>	FY 19-20 Single Family Home Repair
	<b>Target Area</b>	Citywide
	<b>Goals Supported</b>	Increase and preserve affordable housing choice
	<b>Needs Addressed</b>	Affordable Housing Choice
	<b>Funding</b>	CDBG: \$1,322,000
	<b>Description</b>	Rehab assistance for low-income homeowners in need of health and safety repairs.
	<b>Target Date</b>	6/30/2020
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	400 households
	<b>Location Description</b>	Citywide
	<b>Planned Activities</b>	Loans and grants to low-income homeowners to make health and safety repairs.
17	<b>Project Name</b>	FY 19-20 Home CHDO operating contracts
	<b>Target Area</b>	Citywide
	<b>Goals Supported</b>	Increase and preserve affordable housing choice
	<b>Needs Addressed</b>	Affordable Housing Choice
	<b>Funding</b>	HOME: \$183,257
	<b>Description</b>	technical assistance to CHDO organizations. CHDO Operating subfund CHDO Operating fund as per HOME rule (no beneficiaries)
	<b>Target Date</b>	6/30/2020
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	1 CHDO organizations
	<b>Location Description</b>	Citywide
	<b>Planned Activities</b>	Technical Assistance
	<b>Project Name</b>	FY 19-20 HOPWA Subcontracts

<b>18</b>	<b>Target Area</b>	Citywide
	<b>Goals Supported</b>	Prevent/reduce homelessness and increase stability
	<b>Needs Addressed</b>	Basic Services, homelessness prevention/intervene
	<b>Funding</b>	HOPWA: \$1,544,283
	<b>Description</b>	HOPWA Subrecipient. Includes Cascade AIDS Project, Clark County Washington, and Central City Concern programs targeted to people with HIV/AIDS. Over 90% of the of the beneficiaries are low income, i.e. with incomes below 60% MFI.
	<b>Target Date</b>	6/30/2020
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	84 households
	<b>Location Description</b>	
	<b>Planned Activities</b>	HOPWA Subrecipient. Includes Cascade AIDS Project, Clark County Washington, and Central City Concern programs targeted to people with HIV/AIDS. Over 90% of the of the beneficiaries are low income, i.e. with incomes below 60% MFI.
<b>19</b>	<b>Project Name</b>	Carryover Affordable Housing FY 18-19
	<b>Target Area</b>	Citywide
	<b>Goals Supported</b>	Increase and preserve affordable housing choice
	<b>Needs Addressed</b>	Affordable Housing Choice
	<b>Funding</b>	CDBG: \$5,433,658 HOME: \$1,514,291
	<b>Description</b>	Carryover funding for purposes outlined in projects 11 and 12. Carryover will be used for affordable housing. Projects have not been selected yet. These are amounts that may be awarded in this year's NOFA but are unlikely to be in their construction phase before the end of 19-20. This is our normal process for rental housing development and PJ does not anticipate that it will jeopardize its ability to meet HOME commitment or CDBG timeliness deadlines.
	<b>Target Date</b>	6/30/2020

	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	na
	<b>Location Description</b>	Citywide
	<b>Planned Activities</b>	affordable housing
20	<b>Project Name</b>	FY 19-20 Housing Counseling and Assistance
	<b>Target Area</b>	Citywide
	<b>Goals Supported</b>	Increase and preserve affordable housing choice
	<b>Needs Addressed</b>	Affordable Housing Choice
	<b>Funding</b>	:
	<b>Description</b>	Homebuyer counseling and assistance
	<b>Target Date</b>	6/30/2020
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	1500 households
	<b>Location Description</b>	
	<b>Planned Activities</b>	Homebuyer counseling and strategies to close the minority homeownership gap
21	<b>Project Name</b>	FY 19-20 Tenant Based Rent Assistance
	<b>Target Area</b>	Citywide
	<b>Goals Supported</b>	Increase and preserve affordable housing choice
	<b>Needs Addressed</b>	Affordable Housing Choice
	<b>Funding</b>	:
	<b>Description</b>	Tenant Based Rent Assistance administered by Home Forward
	<b>Target Date</b>	6/30/2020

	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	150 households
	<b>Location Description</b>	
	<b>Planned Activities</b>	Tenant Based rent assistance

## **AP-50 Geographic Distribution - 91.420, 91.220(f)**

### **Description of the geographic areas of the entitlement (including areas of low-income and minority concentration) where assistance will be directed**

Multnomah County’s low-moderate income census tracts and block groups are depicted in the following map. Low-moderate income areas are predominately located on the west side of the river. East Portland and Southeast Portland are largely predominated by low-moderate income areas. The majority of the jurisdictions’ federal resources are dedicated toward serving low-income households and individuals.

### **Geographic Distribution**

<b>Target Area</b>	<b>Percentage of Funds</b>
Citywide	100

**Table 5 - Geographic Distribution**

### **Rationale for the priorities for allocating investments geographically**

Portland Housing Bureau (PHB) investments increase the supply of affordable housing at a time when the area is facing rapidly increasing rents and home prices. Per its Strategic Plan, PHB invests in affordable rental housing development and rehabilitation; services to help people move from homelessness to permanent housing; and in programs that help renters, homeowners and potential home buyer’s access and retain housing. PHB funds are invested primarily through competitive solicitations resulting in contracts and development agreements with community-based non-profit and for-profit organizations. The revenue sources reflected on the map below, from largest to smallest, are Urban Renewal Area (URA) Tax Increment Financing (TIF) funds; federal funds; and City of Portland General Fund dollars. TIF funding is geographically restricted; it must be spent in the URA which generated it. Federal funds are available to spend citywide. PHB’s projects and programs serve very-low and low-income households earning up to 80% of area median income. Location-specific projects funded with TIF or federal funds are reflected on the map. Citywide services – including emergency shelters, homebuyer education, foreclosure prevention, and rent assistance – are categorized in the key as ‘unallocated.’ Investments in the Central City are higher due to investments in large affordable rental projects. Notable investments outside of the central city include: assistance for first-time homebuyers, home repair for low-income seniors, and pre-development of affordable housing projects.

### **Discussion**

The City of Portland 2019 Budget Map, shows the total spending per user in the Portland geography and program type. The map shows that the most spending per user takes place in the Central City. The map

can be found at <https://www.portlandoregon.gov/cbo/article/687011>.



## Affordable Housing

### AP-55 Affordable Housing - 91.420, 91.220(g)

#### Introduction

The Portland Housing bureau uses local and federal funds to leverage resources for affordable housing. Partners include the housing authority Home Forward, for profit and non-profit developers, especially those organizations with a mission to serve low income households with barriers to housing choice and serve those who are not served by the market.

One Year Goals for the Number of Households to be Supported	
Homeless	300
Non-Homeless	670
Special-Needs	12
Total	982

Table 6 - One Year Goals for Affordable Housing by Support Requirement

One Year Goals for the Number of Households Supported Through	
Rental Assistance	300
The Production of New Units	112
Rehab of Existing Units	550
Acquisition of Existing Units	20
Total	982

Table 7 - One Year Goals for Affordable Housing by Support Type

#### Discussion

See AP 20 for a breakdown of activities, service and production outcome indicators.

## **AP-60 Public Housing - 91.420, 91.220(h)**

### **Introduction**

This section describes what actions the grantee will take in the given program year to carry out the public housing portion of the Strategic Plan. It identifies the manner in which the plan will address the needs of public housing during the program year.

From 2012 to the present Home Forward has been engaged in its “85 Stories” Initiative. This comprehensive project will rehab 10 high-rise buildings, comprising 85 stories and 1229 units of PH for seniors and people with disabilities in urban neighborhoods. This effort secured the financial and physical health of the buildings which averaged between 30 and 50 years old and needed more than \$80 million in renovations.

### **Actions planned during the next year to address the needs to public housing**

#### **Actions to encourage public housing residents to become more involved in management and participate in homeownership**

Home Forward engages its residents in a process which allows them to have a voice in decisions affecting its various housing programs through its Resident Advisory Committee (RAC). The RAC, comprised of 10-20 volunteers who either live in a Home Forward unit or participate in the Section 8 program, holds monthly meetings (with the exceptions of August and December). Public meetings are conducted quarterly. The results of their work are reported to Home Forward’s Board of Commissioners. The committee chair also serves as the Resident Commissioner on the agency’s Board of Commissioners. In addition to the RAC, the agency routinely involves participants and residents on committees specific to a particular redevelopment or to policy issues. For example, residents and participants served on the Community Advisory Committees that guided Home Forward through several HOPE VI redevelopments, and were also involved in shaping Home Forward’s Rent Reform initiative. For additional information please see previous discussion under SP-50, “Activities to increase resident involvements”.

Although Home Forward does not directly provide homeownership opportunities the agency has partnered with the local Habitat for Humanity affiliate on each of its three HOPE VI project, thus helping to provide a number of homeownership opportunities through Habitat’s programs. Additionally, the agency’s GOALS (Greater Opportunities to Advance, Learn, and Succeed) program provides Home Forward participants with ways to set and reach their goal of becoming self-sufficient through five years of dynamic supportive services. The GOALS program has helped many families with job training and referrals, getting a better job or promotion, child care referrals or even owning a home. This program

offers a solid pathway for financial independence and self-sufficiency and features creative ways to help participants save money to achieve their long-term goals.

**If the PHA is designated as troubled, describe the manner in which financial assistance will be provided or other assistance**

N/A

**Discussion**

N/A

## **AP-65 Homeless and Other Special Needs Activities - 91.420, 91.220(i)**

### **Introduction**

The Consortium activities to address homelessness and special needs fall into following categories; income benefits, health, survival and emergency services, access to service and system coordination.

The local effort to end homelessness is carried out under the umbrella of A Home for Everyone, a collaborative effort by Multnomah County, the City of Portland, the City of Gresham, Home Forward, and other community partners. The Consortium members fund a number of housing and social service providers to provide housing facilities to non-homeless special need populations. These organizations include Blanchet House of Hospitality, Bradley Angle, Cascade AIDS Project, Cascadia, Catholic Charities, Cedar Sinai Park.

For a complete review of year end outcomes please see “A Home For Everyone, End of Year Outcomes Report (FYE) 2018.

[https://static1.squarespace.com/static/566631e8c21b864679fff4de/t/5b9849ef4ae237cd9a892e0a/1536707056241/AHFE\\_FYE18\\_Outcomes\\_Report.pdf](https://static1.squarespace.com/static/566631e8c21b864679fff4de/t/5b9849ef4ae237cd9a892e0a/1536707056241/AHFE_FYE18_Outcomes_Report.pdf)

### **Describe the jurisdictions one-year goals and actions for reducing and ending homelessness including**

#### **Reaching out to homeless persons (especially unsheltered persons) and assessing their individual needs**

The jurisdiction, under the organization of its Continuum of Care (CoC) invests in nearly four dozen outreach and in-reach staff at multiple nonprofits and coordinates with others who identify & engage unsheltered persons on the streets, in cars, camps and other locations throughout our full geography. Within the homeless services system, there are three primary functions that an outreach team can play: Survival Services: All outreach teams play this role as they engage with people on the streets, checking on individuals’ wellbeing, engaging emergency services if needed, providing food, water, blankets, tarps, hygiene and, if qualified, on-site healthcare.

Assessment/Navigation: Almost all outreach teams provide this service, and for some it is their primary role. They assess individuals’ service needs and work to connect them to those services, whether it is treatment, health-care, identification, shelter, transportation, or housing services. They generally do not provide these services themselves; they provide a warm hand-off.

Housing: Several outreach teams provide survival and assessment/navigation services, but their primary responsibility is to work with people to complete all aspects of the housing placement process - barrier removal, unit search, leasing support, move-in support, and, in some cases, even the post-placement supports to help someone retain their housing. Outreach workers within these agencies use Housing First, trauma-informed approaches to build relationships with vulnerable groups (families, youth, Veterans, survivors of domestic violence, and adults with disabilities) interested in accessing resources.

If they give verbal or written consent, sheltered and unsheltered persons are entered into HMIS, assessed through coordinated entry and connected to appropriate housing and services. In this Fiscal Year, we will continue to prioritize using rapid rehousing funds (including ESG, CoC, and leveraged local resources) and outreach to landlords to reduce housing placement barriers. Outreach and engagement providers (including law enforcement) meet regularly at an outreach subcommittee of the local CoC Board to discuss challenges and opportunities to improve coordination. The jurisdiction supports low-barrier day access centers that offer food and hygiene supplies for unsheltered people, which are also used as engagement sites for rapid rehousing and coordinated entry assessment. The jurisdiction also funds long-standing street-to-home placement directly into permanent supportive housing using leveraged local, HUD CoC, and housing authority resources. In this Fiscal Year, jurisdictions will continue a program piloted in FY15-16 that provides intensive street engagement in partnership with local law enforcement professionals to provide housing placement and retention support to people experiencing homelessness in high-impact public areas, especially those who present the greatest barriers to housing and are prioritized based on their vulnerability and public impact. The jurisdiction will also continue successful coordinated entry practices by funding a multi-agency mobile team providing street and site-based outreach/engagement. This team will conduct coordinated entry assessment, provide resource navigation and referral, help participants collect documents necessary for landlords, help mitigate barriers, and provide flexible client assistance to support the rapid transition of people prioritized through coordinated entry to available housing resources.

### **Addressing the emergency shelter and transitional housing needs of homeless persons**

The jurisdiction, under the organization of its Continuum of Care (CoC) conducts annual needs and gaps assessments, which correspond to annual planning for a range of facilities and services that help to address the emergency and transitional housing needs of people experiencing homelessness. The planning occurs primarily through the CoC's Safety off the Streets Workgroup, which recommends investment and policy strategies to the CoC Board and its Executive Committee. The CoC Board adopted community program guidelines for a range of homeless services, including emergency shelter and transitional housing that were generated through a broad community engagement process coordinated by the CoC and staffed by national technical assistance providers from CSH. The guidelines describe emergency shelter and transitional housing activities and outline for each: populations served and prioritized, effective practices, and minimum and ideal operating standards. Investment of resources within this strategic plan, including ESG, HOPWA, and CDBG, are prioritized for investment in aligned activities through direct coordination with the CoC. In FY16-17, the jurisdiction, through its CoC began expanding available safety off the streets options (including emergency shelter and alternative facilities) by more than 650 beds, including 124 for single women, 90 for people in families, 200 for people in couples and, 20 for people fleeing domestic violence.

The jurisdiction, through its local Continuum of Care (CoC) tracks length of time homeless using: Homeless Management Information System (HMIS) data, coordinated entry (CE) systems, a Veterans By-Name List, CoC- and Emergency Solutions Grant (ESG) project data, and CoC system mapping. Local HMIS data shows a significantly longer median length of time homeless in shelter -- from 25 days (2017),

to 40 days (2018). 2018 also showed longer shelter stays and a decrease in household exits. This contributed to a smaller number of people served versus the previous year in addition to other factors. This is likely the result of the housing market, with clients and housing providers reporting that they cannot find affordable housing anywhere in the county.

**Helping homeless persons (especially chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth) make the transition to permanent housing and independent living, including shortening the period of time that individuals and families experience homelessness, facilitating access for homeless individuals and families to affordable housing units, and preventing individuals and families who were recently homeless from becoming homeless again**

The jurisdiction, through our CoC, will continue to use the following strategies to reduce length of time homeless: expanded partnerships with street outreach, shelters, day centers to increase effective engagement; CE to connect people to diversion and rapid rehousing (RRH) resources; adopting HUD's Notice CPD-14-012 prioritization policy for our permanent supportive housing (PSH); prioritizing beds for chronically homeless (CH) families and individuals at turnover; the Short Term Rent Assistance program which equips shelters and mobile staff with RRH. In late 2017, elected officials in the CoC adopted a resolution to create at least 2,000 new units of supportive housing by 2028. Local funding partners (City, County, local housing authority) collaborate extensively with community stakeholders to increase PSH by incenting set aside of PSH units in new and existing housing developments and prioritizing CoC and other funding for development of new PSH units for CH households. The CoC annually applies for additional PSH funding through HUD CoC, VASH, and other sources, and will also reach out to other PSH projects to form agreements to prioritize non-dedicated beds at turnover in the future. Since 2005, the Short-Term Rent Assistance program has consolidated local, state & federal funding (including ESG) and is administered by the local housing authority. In 2014, the CoC launched the Homeless Family System of Care coordinated entry system, which uses a modified F-SPDAT to assess need and prioritize service type and length, with a housing first, assertive engagement approach. Local HMIS data shows our CoC has retained a high permanent housing retention rate for the last two reporting years (see chart below). Housing Retention Source Data: SHAR report Reporting Group:15/16 Perm Placement retention 90% (6 mos.) 86% at (12mos.),16/17 Perm Placement retention 92% (6 mos.) 88% at (12mos.) Our CoC complies with HUD system performance reporting for returns to homelessness using our HMIS. To reduce returns to homelessness, we invest in: 1) flexible local housing retention funds to stabilize households who may face temporary crisis that places them at risk; 2) landlord recruitment & guarantee funds to ensure households placed in private market units have additional resources for stability; 3) housing authority has on-site DV advocates to assist HCV & Public Housing residents to maintain their housing assistance and improve retention; 4) active retention monitoring at 6- and 12-month post subsidy to assess outcomes and provide training for those who don't meet community-wide standards. In this Fiscal Year, the jurisdiction, through its CoC expects to maintain local funding for housing placement and retention for people experiencing homelessness into permanent housing through a range of PSH, RRH and other innovative housing models. Primary priorities will include affirmatively furthering fair housing by

reducing racial disparities in homelessness and reversing recent increases in homelessness among women. Helping low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families and those who are: being discharged from publicly funded institutions and systems of care (such as health care facilities, mental health facilities, foster care and other youth facilities, and corrections programs and institutions); or, receiving assistance from public or private agencies that address housing, health, social services, employment, education, or youth needs.

**Helping low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families and those who are: being discharged from publicly funded institutions and systems of care (such as health care facilities, mental health facilities, foster care and other youth facilities, and corrections programs and institutions); or, receiving assistance from public or private agencies that address housing, health, social services, employment, education, or youth needs.**

## **Discussion**

Employment recovery and economic opportunity programs. The CoC-funded Employment Recovery Project, run by nonprofit Central City Concern, uses a supported employment model to connect adults with multiple barriers (criminal histories, substance abuse) to jobs. Jurisdiction-funded agencies are part of the local Economic Opportunity Program, providing career track training, counseling and job placement through our local Workforce Investment Board, in collaboration with employment providers. The Homeless Benefits Recovery program, led by Central City Concern in partnership with the local Social Security Administration, helps homeless disabled persons unable to work obtain SSI, SSDI & health insurance an average of 14 months faster than typical time. In 2014, the CoC formed a Workforce subgroup to develop priorities for greater employment/housing alignment and improve data analysis at a system-level to inform planning and expansion. The jurisdiction, through our CoC. partners with Worksystems (local WIB), Portland Business Alliance (downtown businesses) and State Dept. of Human Services (TANF, JOBS Works) to increase income opportunities for homeless persons. All three are on the CoC Board and Workforce subgroup. Worksystems is a main liaison between our CoC and statewide WIOA implementation. They oversee the Economic Opportunity Program which provides career track training, counseling and job placement, and leverages federal funds (DOL, DHHS), local housing funds, jobs through local businesses and community-based case management to achieve successful employment & housing outcomes. The subgroup developed strategies that have committed local support: adding rent assistance to an effective employment program, piloting braided DOL/TANF/local funds to support homeless TANF families, and increasing job opportunities through employers. 75% of our CoC projects regularly connect participants to services provided by mainstream employment partners. Summary of Housing Support Facilities both shelter, transitional and special needs. In this Fiscal Year, the jurisdiction, through its CoC expects to maintain, for the fourth year, local funding for homelessness prevention and shelter diversion in order to facilitate prevention of an additional 1,000

people from becoming homeless through eviction prevention-focused rent assistance, clinical staff to work with people with disabilities in affordable housing units to prevent eviction, housing stabilization workers to assist patients as they enter and prepare to exit health care facilities, and legal representation for people at risk of homelessness. Based on the Portland Housing Bureau's State of Housing report, "the City of Portland funds programs designed to prevent and end homelessness for individuals and families. These programs are provided through contracts with various nongovernmental and other public entities, who perform a range of services that address the diverse needs of people experiencing homelessness. These services include short-term rent assistance, eviction prevention and housing placement, emergency shelter, and transitional housing.



**AP-70 HOPWA Goals - 91.420, 91.220 (I)(3)**

<b>One year goals for the number of households to be provided housing through the use of HOPWA for:</b>	
Short-term rent, mortgage, and utility assistance to prevent homelessness of the individual or family	50
Tenant-based rental assistance	45
Units provided in permanent housing facilities developed, leased, or operated with HOPWA funds	63
Units provided in transitional short-term housing facilities developed, leased, or operated with HOPWA funds	2
<b>Total</b>	<b>160</b>

## **AP-75 Barriers to affordable housing -91.420, 91.220(j)**

### **Introduction**

This sections addresses the Actions planned to remove or ameliorate the negative effects of public policies that serve as barriers to affordable housing such as land use controls, tax policies affecting land, zoning ordinances, building codes, fees and charges, growth limitations, and policies affecting the return on residential investment

The Portland Housing Bureau faces potential revenue reductions that could affect funding and staffing levels. Tax Increment Financing (TIF), the largest source of direct funding, is projected to decline by more than half over the next few years. That means money for services and operations is threatened. This reality highlights the need to shift our reliance on discretionary general funds, to stable, ongoing income sources. Anticipated actions include allocating significant new investments of local resources for affordable housing development, homelessness prevention and economic opportunity.

### **Actions it planned to remove or ameliorate the negative effects of public policies that serve as barriers to affordable housing such as land use controls, tax policies affecting land, zoning ordinances, building codes, fees and charges, growth limitations, and policies affecting the return on residential investment**

For the three identified needs and goals the main barrier is loss of Federal Resources and the main strategy is to develop local resources for housing development, homelessness prevention and community economic development.

Barriers and strategies to address them in PY 2019

1. **Barrier:** National housing and economic crisis. **Strategy:** Home Forward requested a market rent study which resulted in an increase in the local HUD Fair Market Rents. These kinds of strategies will continue to be pursued to ensure access for low income households into high opportunity areas.
2. **Barrier:**Federal and local funding shortfalls **Strategy:** Seek local resources to supplement declining Federal resources. A local housing Bond passed.
3. **Barrier:** Lack of an affordable housing supply makes impediments to Fair Housing choice more pronounced. **Strategy:** Increase resources to Educate renters and landlords about the recent State law that requires acceptance of rental applications from households with Section 8 vouchers. Identify and implement additional renter protections.
4. **Barrier:** Historic housing policy and investments such as eminent domain seizures and redlining, still influence patterns of racial and ethnic segregation. **Strategy:** Recognize historic disparities and seek legal and policy remedies, including implementing affirmative marketing requirements and investment

in underserved communities, rent stabilization strategies, housing inclusion strategies, and inclusionary housing policies..

5. **Barrier:** Protected classes still experience illegal housing discrimination especially disabled, racial and ethnic minorities, refugees and immigrants, families, and single female headed household. **Strategy:** Invest in fair housing education and enforcement of fair housing laws through the organizations most likely to reach underserved protected classes.

## Discussion

### Discussion

The Portland Housing Bureau investment priorities include:

- Provide more rental housing for the most vulnerable people.
- Move people quickly from homelessness to permanent housing while preventing families from losing their homes.
- Help Portlanders from communities of color buy a home or keep the home they already own.
- Provide a safety net that includes shelters and other short-term help for low-income Portlanders who are homeless or at risk of homelessness.

See the Portland Housing Bond( <https://www.portlandoregon.gov/phb/79087>), and Metro Bond (<https://www.oregonmetro.gov/public-projects/affordable-homes-greater-portland>) for additional investment priorities and strategies to improve outcomes for underserved communities.

## **AP-85 Other Actions - 91.420, 91.220(k)**

### **Introduction**

Portland is seeing an increase in displacement as a result of households moving to find more affordable housing, including that affordable to working families. The City prioritizes projects to preserve or build affordable housing in areas that assist families achieve self-sufficiency and increase earning capacities and offer services that prevent homelessness. Projects included in the annual plan speak to those efforts. In addition, the City works closely with long-term partner providers to reach out to persons in need, including in language and culturally-appropriate methods. Participating in regional transportation and economic efforts, the City seeks to create vibrant hubs and to increase employment, including local entrepreneurs. Portland continues a strong monitoring practice to maximize the efficacy of funded-efforts.

### **Actions planned to address obstacles to meeting underserved needs**

The City of Portland actively supports quality housing that is affordable to all residents. Portland recently completed a market analysis of housing called the State of Housing in Portland. The report shows increasing lack of affordable housing for many household types and especially for low-income households. Annual actions to address housing affordability use the following guiding principles.

1. Provide more rental housing for the most vulnerable people.
2. Move people quickly from homelessness to permanent housing while preventing families from losing their homes.
3. Help Portlanders from communities of color buy a home or keep the home they already own.
4. Provide a safety net that includes shelters and other short-term help for low-income Portlanders who are homeless or at risk of homelessness. The principles recognized early on that concentrations of poverty and minority populations could block access to opportunities, which is reflected in national policies to promote equal opportunities in all neighborhoods (Affirmatively Furthering Fair Housing). The City promotes a diversity of housing types across all neighborhoods and recognizes that publicly-assisted housing is one component. The City is committed to fostering housing options that working individuals and families can afford. The City will look for new opportunities to preserve and expand housing options for all residents, including low-income residents who need ongoing support.

Specific fourth year actions of Portland's five year Consolidated Plan include the following projects and programs that use both federal and other sources of income.

- Ongoing General Funded rental and fair housing education and enforcement services.

Ongoing research in to methods in East Portland to preserve existing privately held affordable housing in East Portland to mitigate against risk that these units be lost (e.g. become uninhabitable or get renovated to target higher-income tenants) and to address the percentage of "rent burdened" households – something experienced disproportionately by communities of color.

- Ongoing General Fund for Homeownership and Home Retention in order to make these services available outside URA's and mitigate involuntary displacement, with an emphasis upon people of color and seniors and low-income households in the flood plain.
- Allocate General Fund for East Portland Home Repair to stabilize households and address a disparity of City investment from both a geographic and racial/ethnic perspective.
- Allocate General Fund Ongoing for homeowner case management citywide. This will allow PHB to address factors contributing to involuntary displacement (such as predatory real estate practices and lending, complications in estate planning and challenges of maintaining a large home) with a focus on communities of color.
- Allocate annual federal grant funding (CDBG/HOME) for rental housing development to increase resources available to be used outside of URA's. This allows increases PHB's ability to create and maintain affordability in gentrifying communities and racial/ethnic communities at risk of displacement.
- Allocate Lents URA funding for rental housing development to preserve and create affordable housing in East Portland – a neighborhood at risk of involuntary displacement, something experienced disproportionately by communities of color.
  - Significant new investments through Bond resources for new rental housing development that serves underserved communities.
  - Significant new local funding for services and programs to serve renters and prevent unwanted displacement.

### **Actions planned to foster and maintain affordable housing**

Action to preserve affordable housing units that may be lost from the assisted housing inventory include funding for restructuring debt, loans and grants assistance for rehabilitation of single family homes and multi-family, zoning bonus incentives to preserve affordable housing, and affordability covenants.

As the 11X13 campaign has concluded the City continues to work to preserve affordable housing that may be lost from the housing inventory. The City recently purchased the Joyce Hotel, one of the last buildings in the Downtown core that provides temporary rooms and shared hostel beds to extremely-low income residents. Despite its being a hotel, some residents have lived in the Joyce for many years as their primary dwelling. Work to preserve and rehabilitate affordable housing in the jurisdictions

regulated portfolios is ongoing, with a significant proportion of the rental development budget each year dedicated to rehabilitation of existing units and restructures of loans to allow partners to keep operating affordable units. To further the objective of quality housing for all segments of the population, the City supports rehabilitation of units to provide permanent accessibility for persons with disability and home repair assistance for lower-income households. In addition, the City provides assistance for lower-income homebuyers in the form of down payment assistance. The City works with the community to affirmatively remove the minority homeownership gap in addition to other racial disparities in equitable enjoyment of and access to housing. The new Enhanced Rental Inspection Program and has been effective and the city is considering expansion of this program. The program results in inspection for compliance with a broad range of habitability standards including fire, life, and safety code violations. Common violations found and corrected are visible mold, inadequate ventilation, illegal heat sources, plumbing disrepair, inoperable smoke detectors, and exposed wiring. The inspection program is a practical approach to raised expectations for both landlords and tenants. Community based plans also identify resources and strategies for landbanking.

### **Actions planned to reduce lead-based paint hazards**

For twenty years, PHB has been successfully applying for the HUD Lead Grant. Currently the HUD Lead grant is between funding periods. PHB was granted a lead award of 3 million dollars over 3 years. The lead grant services households below 80% AMI, and is focused on remediating lead hazards. This funding can leverage Multnomah County Weatherization Program and the home repair grants PHB community partners administer. Also, PHB's home repair loan, can leverage the lead hazard reduction grant. Program elements of the lead grant include: rehab education, certification of contractors, resource to contain lead based paint hazards in homes of low-income homeowners, home testing and blood testing of children, relocation assistance for families with exposure to lead.

Additionally, Acquisition and rehab of housing units funded with federal dollars, and built before 1978, are reviewed to confirm compliance with the Lead Safe Housing Rule. For units acquired with federal funds, per 24CFR 35 subpart K, any deteriorated paint is stabilized before occupancy. In units undergoing rehabilitation, per 24CFR 35 subpart J, the unit is assessed for lead-based paint and lead-based paint hazards as required by the amount of funding committed to the project. The lead hazards are then addressed as required by subpart J and the funding amount. The HUD Lead Grant referred to above is often able to assist in funds and compliance with the Lead Safe Housing Rule when there are children under 6 occupying or visiting the units.

### **Actions planned to reduce the number of poverty-level families**

The City is a partner in the Comprehensive Economic Development Strategy (CEDS) and supports links

between industry and education (at the high school and higher education levels), supports diversity in the workplace and in industry, and supports activities raising the skills and employability of underrepresented and disadvantaged populations. The City has invested in youth and adult workforce development, and microenterprise services since 2004 through EOI. PDC administers the microenterprise component and contracts with seven community agencies to provide services. Worksystems, Inc. administers the adult and youth workforce components and contracts with thirteen community agencies to provide services.

The goals of this program are to raise the incomes of very low-income Portland residents through workforce and microenterprise development, focusing on reaching participants who often face multiple barriers to employment, including but not limited to: homelessness, limited English proficiency, criminal histories, drug and alcohol addictions, and lack of educational credentials and basic job preparation skills.

### **Actions planned to develop institutional structure**

The Portland Housing Bureau examined the use of federal grant funds and determined that some adjustments could be made to better match funding sources with programming. Shifting funding for tenant-based rent assistance, homeownership programs, and fair housing programs from federal sources (HOME and CDBG) to ongoing General Fund within the adjusted base also frees up these federal funds for rental housing development, preparing for a robust fall 2019 NOFA.

The budget decisions represent a coordinated and evidence-based effort to align planning goals with program offerings, taking into particular account the need for focused stabilization efforts in East Portland beyond urban renewal boundaries, displacement mitigation (with a particular focus on the implementation of the N/NE Neighborhood Housing Strategy and the associated Preference Policy, as well as the citywide expansion of multifamily rental programs), and A Home for Everyone implementation. Budget key performance measures are tied to the goals and policies adopted by the Home for Everyone Executive Committee as well as the Draft 2035 Comprehensive Plan.

In 2019 new Rental Services programming and expanded Fair Housing Services will be implemented through a new Rental Services Office. Additional expanded capacity to offer permanent supportive housing with new rental housing development was made possible through new Bond resources and commitment of supportive services funding by Multnomah County.

### **Actions planned to enhance coordination between public and private housing and social service agencies**

- In 2013, leadership from the City of Portland, City of Gresham, Multnomah County, and Home Forward created a renewed plan for ending homelessness in our community, called A Home for

Everyone: A United Community Plan to End Homelessness in Multnomah County (AHFE). The plan chartered a new coordinating board to provide shared oversight of our community's work to end homelessness. The board is led by an executive committee, comprised of elected officials from Portland, Gresham and Multnomah County; leadership from Home Forward and Meyer Memorial Trust; as well as representatives from the faith and business community. That Coordinating Board and its Executive Committee, with leadership from local jurisdictions, developed a comprehensive action plan in spring 2015, and implementation is underway and the Joint Office of Homeless Services has been formed. The action plan recommends investments in the most effective strategies, with a goal to reduce homelessness by 50%, in addition to ensuring that no families, women, or adults with disabilities are unsheltered by the January 2017 homeless street count. The City of Portland is fully aligned with the priorities and goals of A Home for Everyone.

- The City of Portland is also member of a Regional Fair Housing work group comprised of representatives from the Portland/Vancouver Metro Area that receive federal funding and must deploy that funding in the context of a Fair Housing Assessment and Plan. The jurisdictions and organizations that have chosen to meet are Multnomah County, Clark County, Clackamas County, Washington County, City of Gresham, City of Beaverton, City of Portland, State of Oregon and the Fair Housing Council of Oregon. We recognize that many fair housing issues cross jurisdictional boundaries and may require a regional approach. They meet to learn from each other about how best to meet our federally mandated fair housing planning and implementation.
- As noted, the City participates in the Comprehensive Economic Development Strategy (CEDS), as well as in regional transportation planning efforts. Both contain strategies that encompass whole communities and neighborhoods. That includes outreach to residents and businesses. Strategies are cross-cutting recognizing that real opportunity is inclusive – housing, transportation, jobs, shopping, services, and recreation. The City will continue to participate in regional strategies. The City of Portland is a member of the Continuum of Care and will continue to provide input and act on recommendations. Acting alone and with Multnomah County and the City of Gresham, Portland encourages partnerships across public and private sectors. The N/NE Initiative is a prime example of outreach in a community, bringing residents, businesses and outside expertise together to create real solutions in a neighborhood.
- Associated Programs include:
  - Modify homebuyer assistance programs to focus on foreclosure prevention and assistance and stabilization of households at risk of displacement.
  - Fund a study of housing development costs.
  - Seek local source of funding to supplement and replace lost federal funding.
  - Enact policies that slow or overcome displacement pressure on low-income communities that want to stay in their community including strategies to modify screening, and marketing to get more inclusive results.
  - Supplement projects with local funding for activity that cannot be funding with federal



resources.

- Recognize and change regulatory barriers such as fees, taxes, zoning and incentives.
- Invest in education of landlords, renters and homebuyers about their rights and responsibilities.
- Affirmatively address the outcome of historic policies that have led to housing segregation, and inequitable access to community resources, benefits and outcomes.

## **Discussion**

Portland is seeing an increase in displacement of low income families and vulnerable families, defined as members of protected classes, from infrastructure rich neighborhoods, as a result of households moving to find more affordable housing, including housing affordable to working families. The City investments include projects to assist families achieve self-sufficiency and increase earning capacities. Projects included in the Annual Plan speak to those efforts. In addition, the City works closely with long-term partner providers to reach out to persons in need, including in language and culturally-appropriate methods. Participating in regional transportation and economic efforts, the City seeks to create vibrant hubs and to increase employment, including local entrepreneurs. Portland continues a strong monitoring practice to maximize the efficacy of funded-efforts

## Program Specific Requirements

### AP-90 Program Specific Requirements - 91.420, 91.220(I)(1,2,4)

#### Introduction

Projects planned with all CDBG funds expected to be available during the year are identified in the Projects Table. The following identifies program income that is available for use that is included in projects to be carried out. The program specific eligibility requirements for Notices of Funding or other solicitations are outlined on the City of Portland website, <http://www.portlandoregon.gov/phb/60714>.

The Portland Housing Bureau (PHB) supports new housing development and rehabilitation of existing properties, primarily in Portland's Urban Renewal Areas. The main resources are as follows:

- **Opportunity Fund - Updated February 2015**
- Opportunity Fund Notice
- Opportunity Fund Scoring Criteria
- **Direct Financial Assistance Programs for Rental Housing Development:** Learn about low-interest affordable housing development loans, available through an annual NOFA process
- **System Development Charge (SDC) Exemptions:** The SDC Exemption Program assists developers by reducing their development costs when building affordable housing
- **Limited Tax Exemptions (LTE):** Learn about property tax exemption programs for single-unit homes and multi-family rental units
- **Portland BOND** Portland's Housing Bond is a \$258.4 Million voter-backed initiative to create more affordable housing in Portland—now and for the future. For more information, visit [portlandhousingbond.com](https://www.portlandoregon.gov/phb/74262) (<https://www.portlandoregon.gov/phb/74262>)
- **Metro Bond-** A future source of housing development funding that is similar to the Portland Housing Bond.

**Community Development Block Grant Program (CDBG)  
Reference 24 CFR 91.220(I)(1)**

Projects planned with all CDBG funds expected to be available during the year are identified in the Projects Table. The following identifies program income that is available for use that is included in projects to be carried out.

1. The total amount of program income that will have been received before the start of the next program year and that has not yet been reprogrammed	1,866,800
2. The amount of proceeds from section 108 loan guarantees that will be used during the year to address the priority needs and specific objectives identified in the grantee's strategic plan.	0
3. The amount of surplus funds from urban renewal settlements	0
4. The amount of any grant funds returned to the line of credit for which the planned use has not been included in a prior statement or plan	0
5. The amount of income from float-funded activities	0
<b>Total Program Income:</b>	<b>1,866,800</b>

**Other CDBG Requirements**

1. The amount of urgent need activities	100
2. The estimated percentage of CDBG funds that will be used for activities that benefit persons of low and moderate income. Overall Benefit - A consecutive period of one, two or three years may be used to determine that a minimum overall benefit of 70% of CDBG funds is used to benefit persons of low and moderate income. Specify the years covered that include this Annual Action Plan.	90.00%

**HOME Investment Partnership Program (HOME)  
Reference 24 CFR 91.220(I)(2)**

1. A description of other forms of investment being used beyond those identified in Section 92.205 is	
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2019	

as follows:

The City of Portland does not have any other forms of investment beyond those described in Section 92.205. Section 92.205 captures all the forms we use.

2. A description of the guidelines that will be used for resale or recapture of HOME funds when used for homebuyer activities as required in 92.254, is as follows:

The City of Portland and Multnomah County do not and will not use HOME funds for homebuyer activities for the duration of this Plan. The City of Gresham does use HOME for homebuyers. The City of Gresham uses a “recapture” model for the HOME funds expended to assist homebuyers in the purchase of a new home. Under HOME recapture provisions, financial assistance is provided directly to the buyer or the homeowner and must be repaid, along with a portion of the share of appreciation, further described below, if the property is sold during the affordability period. The seller may sell the property to any willing buyer at any price. Once the HOME funds are repaid to the City of Gresham, the property is no longer subject to any HOME restrictions. The funds returned to the City of Gresham may then be used for other HOME- eligible activities.

\*The City of Gresham HOME guidelines are attached and amend the previous guidelines offered in the Consolidated Plan.

3. A description of the guidelines for resale or recapture that ensures the affordability of units acquired with HOME funds? See 24 CFR 92.254(a)(4) are as follows:

See the attached City of Gresham HOME recapture guidelines.

4. Plans for using HOME funds to refinance existing debt secured by multifamily housing that is rehabilitated with HOME funds along with a description of the refinancing guidelines required that will be used under 24 CFR 92.206(b), are as follows:

No plans at present to use HOME funds to refinance existing funds. To do so, the City of Portland would amend the Action Plan because it is very unusual for to undertake this activity.

### **Emergency Solutions Grant (ESG)**

1. Include written standards for providing ESG assistance (may include as attachment)

See attached ESG standards in Exhibit F of the 2016 Consolidated Plan. Or view the ESG guidelines webpage (updated April 2017) at

[https://static1.squarespace.com/static/566631e8c21b864679fff4de/t/591227cff5e231d88c83d4f5/1494362064850/ESG\\_Guidelines.pdf](https://static1.squarespace.com/static/566631e8c21b864679fff4de/t/591227cff5e231d88c83d4f5/1494362064850/ESG_Guidelines.pdf).

2. If the Continuum of Care has established centralized or coordinated assessment system that meets HUD requirements, describe that centralized or coordinated assessment system.

Our coordinated entry (CE) covers the full CoC area and is based on Assertive Engagement to reduce wait time & client travel and increase access with focus on client choice and housing first. We outreach to service agencies, faith groups, businesses, law enforcement, self-sufficiency programs, hospitals & other discharge agencies to refer to CE. Information is shared in different languages through 211 (info line), websites, social media, emails and community meetings. 211, outreach teams, community centers and providers serve as entry points. Staff meet people where they are (cars, under bridges) and use client-centered approaches to build trust. Population-specific tools are used in HMIS to assess household need and vulnerability (CH, risk of victimization, health), to connect people to resources (diversion, shelter, TH, RRH, PSH, mainstream services.) Youth use a self-sufficiency matrix; families use a modified FSPDAT, DV use a Safety & Stability tool and CH adults use VISPDAT.

The CoC Consolidated Application was submitted by the Joint Office of Homeless Services to the U.S. Department of Housing and Urban Development (HUD) on September 13, 2016 at 4:00 PM. The application is for more than \$20 million in annual funding for homeless services, most of which support 47 existing permanent and transitional housing programs operated by more than 18 local nonprofits and governments. Together these programs help to house more than 1,500 formerly homeless households throughout Multnomah County.

For a full review of current CoC activities and guidelines refer to their webpage at <http://ahomeforeveryone.net/coordinatedaccess/>.

3. Identify the process for making sub-awards and describe how the ESG allocation available to private nonprofit organizations (including community and faith-based organizations).

A Home for Everyone is led by its Executive Committee, which by charter includes Portland's Mayor and Housing Commissioner, the County Chair, a second County Commissioner, the Mayor of Gresham or a designated Councilor, the Director of Home Forward, and representatives from the faith, philanthropic and business communities.

The Executive Committee is supported by a Coordinating Board made up of appointed community members and leaders from the non-profit, health, education, public safety, business, and government sectors, as well as several strategic Coordinating Board subcommittees

The City of Portland with the Home for Everyone Executive committee currently renews funding for nonprofit agencies carrying out ESG-funded emergency shelter activities, provided that the

contractual obligations have been met and project outcomes have been successful. The City may choose to reduce or eliminate funding to an agency that does not meet contractual obligations, or that administers a project that fails to meet outcome goals. If an existing program does not fit with the Bureau's objectives, the agency may be asked to change its program design. The City may also transition to a competitive RFP process. The City does not plan to initiate other large ongoing ESG-funded emergency shelter programs. The City of Portland currently subcontracts all ESG-funded short-term rental assistance funding to Home Forward, which administers the local Short Term Rent Assistance (STRA) Program, using a mix of federal, state, and local funds. Home Forward periodically solicits STRA Program service providers through an open, competitive request for proposals process. For more information about the award process visit A HOME For Everyone website <http://ahomeforeveryone.net/cocresources/>.

4. If the jurisdiction is unable to meet the homeless participation requirement in 24 CFR 576.405(a), the jurisdiction must specify its plan for reaching out to and consulting with homeless or formerly homeless individuals in considering policies and funding decisions regarding facilities and services funded under ESG.

The Portland City Council is the policy-making entity for the Portland Housing Bureau. Because all members of Portland City Council are democratically elected officials, PHB is unable to meet the homeless participation requirement under § 576.405(a). In order to meet the requirements under § 576.405(b), PHB will consult with homeless and formerly homeless individuals in considering and making policies and decisions regarding any facilities, services, or other assistance that receive funding under the Emergency Solutions Grant through ongoing consultation with the A Home for Everyone Coordinating Board (the local CoC Board). The local CoC Board and its multiple subcommittees each include participation by multiple people with lived experience of homelessness. One CoC Board subcommittee (the Community Advisory Forum) specifically provides a solutions-driven forum for those with lived experience of homelessness and front-line service workers to listen and support each other. It also brings consumers, providers and interested community members together to share information, and identify emerging issues and trends.

5. Describe performance standards for evaluating ESG.

ESG Program Guidelines established for short term rent assistance are attached as Exhibit F of the 2016 Consolidated Plan. In reference to HUD's 7/15/2016 monitoring letter, our continuum is in the process of establishing updated ESG guidelines that will be inclusive of shelter services and compliant to §576.400(e)(1) & (e)(3). The guidelines were approved and adopted by the A Home for Everyone Coordinating Board, our CoC Board in 2016.

In establishing the coordinated Short Term Rent Assistance (STRA) program, the local CoC Board developed two primary performance standards for short-term rent assistance activities under the

local Plan to End Homelessness (and subsequently within the CoC): 1) Number of households placed or retained in permanent housing 2) Percentage of assisted households retaining permanent housing at three, six and 12 months post-subsidy

Performance data are recorded by STRA providers in the regional HMIS and reported via the standardized Shared Housing Assessment Report. Cumulative STRA program performance standards for housing retention are 90 percent of assisted households at three month post-subsidy, 80 percent at six months and 70 percent at 12 months. ESG activities will be evaluated using these existing performance standards. As HUD provides a detailed regulatory framework for implementation of the HEARTH Act via the Continuum of Care Interim Rule, PHB and the local CoC will collaborate to develop shared CoC and ESG program performance standards that align with community-level performance standards established through that regulatory framework. For more information about ESG guidelines visit "A Home for Everyone" website <http://ahomeforeveryone.net/guidelines/>.

All three of our CoC's Consolidated Plan jurisdictions (Portland, Multnomah County, Gresham) are represented on the CoC Board (meets monthly) and its Executive Committee (meets quarterly.) The CoC coordinates with Consolidated Plan jurisdictions through meetings, calls and emails, to organize needs and Action Plan hearings and subcommittee work on strategic planning, outreach, evaluation and system coordination. The CoC devotes 4 hrs/mo. with Portland and Multnomah County, and 2 hrs/qtr. with Gresham. CoC goals from our local homelessness plan align with our Consolidated Plan. Under the 2016-2020 Consolidated Plan, this primarily comes through coordination between the CoC needs assessments and strategic plan and the Consolidated Plan priority need #2 (Need for basic services and for homelessness prevention and intervention) and goal #2 (Reduce homelessness and increase stability), though each of the Consolidated Plan priority needs and goals also aligns with CoC effort (especially those related to affordable housing production and preservation and economic opportunity). The CoC works with all three jurisdictions to engage consumers, neighborhoods and public agencies providing housing, health and social services (including health care agencies and the public housing authority.)

Describe consultation with the Continuum(s) of Care that serves the jurisdiction's area in determining how to allocate ESG funds, develop performance standards and evaluate outcomes, and develop funding, policies and procedures for the administration of HMIS (AP90)

The CoC actively solicits and integrates ESG recipient participation in planning, evaluation & reporting. The Portland Housing Bureau (PHB) staffs the CoC Board and is also an ESG grantee and lead agency for the CoC and Portland Consolidated Plan. The CoC gathers input from ESG recipients through subcommittees, including the data & evaluation subcommittee, to assess needs and guide ESG funding

decisions to more effectively end homelessness. Our CoC currently directs ESG to expand capacity of the regional Short Term Rent Assistance program and operate emergency shelter closely aligned with locally- and CoC-funded housing resources. PHB monitors ESG recipients and evaluates project performance using CoC-developed housing placement outcomes collected in the regional homeless management information system (HMIS). Data is analyzed from project-level outcomes, system-wide point-in-time counts of homelessness and HMIS reports and ESG recipient feedback, and ESG-specific policies and procedures are included in the CoC's adopted HMIS policies and procedures. The CoC's data & evaluation subcommittee evaluates outcomes.



## Attachments

**Event:** Community Needs Meeting

**Date:** November 15, 2018

**Time:** 5:45 PM – 7:45 PM

**Location:** New Song Community Center

**Facilitators:** Kim McCarty, JoAnn Gillmer, Jessica Conner, Dyvisha Gordon, Maxine Fitzpatrick

**Participants:** (20 Total)

### Summary

Each year the Portland Consortium of the City of Portland, City of Gresham and Multnomah County hold community meetings to hear about community housing, economic development and social service needs. Three hearings were planned. The hearing in Spanish was cancelled due to no RSVP's.

Approximately twenty people attended the November 15th meeting and approximately twenty people attended the Gresham and Multnomah County hearing. Below is a summary of the discussions had November 15, 2018 at New Song Community Center. Summary of the joint Multnomah County and City of Gresham meeting held November 13th at the Gresham Library is summarized separately.

Attendees participated in small group discussions to share their experiences in the community with City and County staff. Facilitators asked a series of questions to gather input and prioritize community needs regarding community, housing, infrastructure, economic opportunity and other services. While attendees shared their ideas and experiences, facilitators took notes to accurately record and summarize the groups' discussions. Following the discussion each participant was given three stickers to add to their group's notes to vote for items they felt were the highest priorities. Overall 20 attendees participated in voting with a total of 55 votes. Asterix (\*) indicates a priority "dot".

(x2, x3, etc.) indicate item mentioned repeatedly within same question/session.

Participants emphasized housing needs as the highest priority in every group and in relation to every discussion topic. For Gresham and East Multnomah County the community offered similar feedback. Staff responses to key concerns will be summarized in the FY 2019-2020 Annual Action Plan.

**Question 1- Community Experience:** *What changes did you see in your city and/or neighborhood that contribute to a positive community experience? What changes did you see in your city and/or neighborhood that contribute to a negative community experience?*

Question 1-Response Summary: The bus system in Portland is helpful, and social service providers such as Outside In and college assistance programs are effective. However, some of the positive changes and gentrification are leading to the displacement issues. Even established social service providers are not resourced to overcome the income and price problems caused by gentrification. Because of rising rents, participants noted less diversity, and loss of neighborhood/cultural identity. In some area's participants are experiencing over policing, and in other communities, a failure of response by the police. Gentrification was also identified as the reason for increased homelessness and litter.

**Question 2- Community Services Needed:** *Are community services in your city and/or neighborhood adequate? If not, what is missing? (Community services can include: recreation activities, social services, parks programs, etc.)*

Question 2 - Response Summary: Participants identified regulated affordable housing, targeted to 0-30% MFI households as the most important social service, followed by shelter for the homeless. Other identified needs included late-night shelters, short term rent assistance, and emergency mental health. Participants felt that if people who are homeless, are not offered shelter, bathroom facilities and trash pickup, then the community will experience more public health issues from trash and human waste. Service is also lacking for low-income homeowners. Participants believe low-income homeowners cannot afford the trash service and are dumping in the neighborhood.

**Question 3- Economic Opportunity:** *What economic development activities would you like to see in your city and/or neighborhood? (Economic development can include: job training, job creation, micro-enterprise projects, improvements to business store fronts, etc.)*

Question 3- Response Summary: Helping people become homeowners and helping current homeowners remain homeowners were considered central to economic opportunity. The discussion regarding economic opportunity centered on the elderly. People are living longer and working in their senior years because their retirement income is not enough. Issues of property taxes, public official accountability, access to education and training, business grants and sustainable incomes were identified as key means to prevent housing instability for elders.

**Question 4- Infrastructure Improvements:** *What infrastructure improvement projects do you think are needed in your community? (Infrastructure improvements include: more lighting, street improvements, sidewalks, pedestrian crossings, park projects, etc.)*

Question 4- Response Summary: Participants disproportionate barriers to transportation based on income because of the cost of fares and race because low-income people and People of Color are disproportionately targeted for infractions and those infractions are over criminalized. Solutions suggested included “gate fares.” Although bikes are an affordable means of transportation, participants note that bikes will be underutilized until the road infrastructure is made physically safe and discrimination safe for the most vulnerable bicyclist.

**Question 5- Barriers to Housing & Housing Discrimination:** *Do you know of anyone who has experienced barriers to housing choice or housing discrimination? How does this impact the community as a whole?*

Question 5- Response Summary: Housing discrimination was identified as a cause of housing instability, especially in the private housing market. It appears that most regulated affordable housing is being built for households at 60 -80 MFI and not for the 0-30 % MFI households that are most in need. Tiny homes and rent control were suggested solutions. Gresham Participants shared their experiences with unfair treatment from landlords and emphasized the need for advocacy and communication with landlords and property management. Discussions called attention to senior citizen’s housing needs and their increased vulnerability due to rising rents and property taxes. Seniors are often on fixed incomes and cannot afford drastic increases in their expenses. Many programs to prevent homelessness are only available to families with children.



**11.15.19 Portland Need Hearing Notes.** Asterix (\*) indicates a priority “dot”.  
(x2, x3, etc.) indicate item mentioned repeatedly within same question/session

**Question 1- Community Experience:** *What changes did you see in your city and/or neighborhood that contribute to a positive community experience? What changes did you see in your city and/or neighborhood that contribute to a negative community experience?*

**Question 1 notes: Changes, positive and negative**

Positive:

- Green spaces,
- Parks
- Community Centers
- \*Bus system
- Road “diets”
- \*Outside-In services
- Increased transit access allows access to housing
- CCC project @ 122<sup>nd</sup>
- CCC project w/partnering for hospice care for homeless
- PEAR program
- Services to house people (however, issues with ability to retain housing because of cost).
- Peer support method for mental health
- \*College programs through some sources
- Recognition that housing is an issue (however, many of the same policies)
- Parkrose drainage ditches 122<sup>nd</sup> helps run-off
- Piedmont more high-density housing
- City Hall Leadership change, listening to workers
- Affordable housing looks good, blends in
- Mixed use and commercial space
- Wonderful parks and rec

Negative

- \*Less policing
- More homeless (x4)
- More drug activity (X2)
- Dealers (drug?)
- Negative reputation (Rockwood)
- \*\*Gentrification (draining of diversity, loss of neighborhood/cultural identity)
- Structure of new housing designed for young (less ADA access)
- (People feel) Trapped in circumstances

**Question 1: Changes, positive and negative, continued (negative)**

Negative

- Not enough parking
- Lack of jobs
- Shelters are unsafe for youth
- Applying for housing takes a very long time
- \*Rents too high (Rockwood)
- Rent increases

Poor landlords  
 Section 8 vouchers too limited  
 Lack of (regulated?) affordable housing/wait lists too long (x2)  
 Age-out limit at shelters  
 Lack of NOAH  
 What affordable means (too much of income to rent)  
 Being told can't hand out food to people on the street  
 Discrimination against people w/disabilities  
 Portland crowded  
 More noise  
 Homeless affects (effects?) infrastructure and health (clutter, dirt, no place to help people w/hygiene)  
 (need to?) Make places to help people clean up like Seattle  
 \*Wapato empty  
 Lack of public toilets  
 Few businesses of color have access to new space (i.e. Alberta Commons do not have people of color businesses)  
 Maintenance of streets  
 \*Lack of streets, sidewalks (Cully)  
 Lack of accessible access  
 City hall will not help homeowners pay for sidewalks.

**Question 2- Community Services Needed:** *Are community services in your city and/or neighborhood adequate? If not, what is missing? (Community services can include: recreation activities, social services, parks programs, etc.)*

Place for laundry, health, shower, TPI shelter  
 \*Public toilets  
 (providers) lack money  
 (providers) lack competency in deliverables  
 Nonprofit orgs to do advertise services well, ways to navigate services  
 The booklet (?) is out of date or not available  
 Lack of resources is intentional  
 Lines too long, by appointment only  
 \*Places to put garage and human waste  
 \*Most of the trash if from low income residents because people cannot afford trash (service) so they dump (trash) next to camps  
 \*Elderly cannot afford to transport or hire waste disposal or cannot lift it  
 Service to pick up large items  
 Preference Policy should have recruited clients and in the hand of culturally specific agencies

**Question 2: (Services) continued**

\*\*\*\*\* Want more affordable housing (as regulated)  
 \*\*Project-based 0-30% units  
 \*Community engagement  
 \*\*\*Resources for housing homeless. Currently revolving cycle, limited service providers

- \*Short term rental assistance
- \*\*Emergency mental health services
- \*\*Late night shelters
- Shelters (general)
- PHB seems to not trust partners, and organizations.
- Parks underdeveloped
- Community service center
- (need) Child welfare center, parenting resources, community connection
- Access to information of what resources exist
- No place for people to hang
- Health and safety programs
- More affordable childcare
- Help to avoid eviction, home retention
- Crisis responders
- Case managers
- New models need to respond to this issue
- Permanent Supportive Housing
- Better bedding, showers

**Question 3- Economic Opportunity:** *What economic development activities would you like to see in your city and/or neighborhood? (Economic development can include: job training, job creation, micro-enterprise projects, improvements to business store fronts, etc.)*

- \*Business need grants and loans
- Store front grants help community
- \*Improve job training by working w/High Schools and colleges
- Short- and long-term training to bridge skill gap i.e. housing construction, vocational tech
- \*\*Older people live longer and need new careers, cannot afford to retire
- Taxes will price out older people i.e. the Bond may impact the ability of older homeowners to retain their housing if over taxed
- The Bond may not help low income
- Target area job (Enterprise Zones)
- \*We do not need an Art Tax
- Tax reform
- \*Grocery stores, access to healthy foods
- Job training, help develop people formerly incarcerated and young people
- Vocational training
- \*\*Homeownership Opportunity
- Housing outside market rate
- \*\*\*Holding our legislators accountable for their inactions
- Youth employment and job training opportunities
- Free college w/less restrictions, maybe income based, maybe for focused areas beneficial to the City
- Year-round summer works
- Lower savings cap for Medicaid
- Low income small business loans

Better dissemination (of information) about programs/opportunities that currently exist  
 Financial assistance, 1<sup>st</sup> time home buyers  
 Matched savings account through employers  
 \*\*\*\*Universal income

**Question 4- Infrastructure Improvements:** *What infrastructure improvement projects do you think are needed in your community? (Infrastructure improvements include: more lighting, street improvements, sidewalks, pedestrian crossings, park projects, etc.)*

Street improvements-potholes  
 More pedestrian crossings signaled  
 All pedestrian signal crossings-Powell  
 Separate, buffered bike lane between traffic and sidewalk  
 Sidewalks in East Portland  
 More bathrooms in parks, bathrooms open year-round  
 Are there enough parks in high density areas or East Portland?  
 \*Add Max station gate fares  
 Traffic is bad, gridlock due to too many people  
 Put two lanes back on Williams  
 \*Conflict bikes and car safety  
 Make downtown foot traffic  
 Bicycle  
     Get a license  
     Improve safety and training  
     Be aware of affordability  
 Remove mid-street crosswalks (MLK)  
 Lighting, street improvements (all listed in the question)  
 Garbage,  
 Hire people who want to clean streets  
 Public bathrooms  
 Traffic flow, connectiveness for foot and bike traffic  
 Curbs and sidewalks  
 Equitable infrastructure

**Question 5- Barriers to Housing & Housing Discrimination:** *Do you know of anyone who has experienced barriers to housing choice or housing discrimination? How does this impact the community as a whole?*

Economic barrier, disabled, fixed income, source of income  
 Will face discrimination because of fixed income if he wants to live in new building  
 Fair Housing Barriers for the following groups:

- Sexual Orientation (LGBTQ+)
- Age
- Race (x3)



- Disability (x3)

Nowhere to go, not protected, not engaged

\*\*Housing instability, multiple moves

#### **Question 5: (Discrimination) continued**

Families doubled up, people couch surfing creates stress

Transportation becomes problematic

Youth must travel longer distances to get to school

People w/disability have limited choices

People with a criminal record

\*Private landlord discrimination

Leads to poor relations between individuals and property manager

Need property tax relief for certain incomes

Tax debt can affect what heirs inherit

We need a definition of affordable

Define low income and living wage

Need to allow for incomes rising in place

Keep at 30% throughout tenancy, give more time to get stable (over 2 yrs.)

Priced out middle-income households

Displacement breaks up community

\*\*\*Affordable Housing is not affordable

Research who has done gentrification well

Rent control housing

Parking proportional to housing units

Parking units are expensive

Need to partner w/landlord for solutions

Do not demonize landlords or renters

City landlord training helped

\*Build affordable tiny homes, Eugene example Square One villages

#### **Additional Comments:**

Comment from a resident of the Portland Cully neighborhood. Research housing model of Square One Villages in Eugene. Consist of Emerald Village, Opportunity Village. It is self-funding, requires no government funding. Residents pay \$300 per unit, with no time limit. Portland does not have anything quite like it. Building/land code may need to be adjusted for this model. For Affordable Housing; Build high quality tiny homes. Not for everyone but enough of them would alleviate some of the burden. Way under \$40,000 per unit. For homeless services, provide sustainable and affordable tiny homes that can be created over and over.

Affordable housing is not so affordable for many low-income citizens.

Make use of WAPATO for housing for homeless. It will also create jobs. No Arts Tax. More responsible bicyclists through bike regulation.



## Summary of Community Priorities

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Votes	Topic- question #
8	***** Want more affordable housing (as regulated)-2
4	****Universal income-3
3	***Affordable Housing is not affordable-5
3	***Holding our legislators accountable for their inactions-3
3	***Resources for housing homeless. Currently revolving cycle, limited service providers
2	**Emergency mental health services-2
2	**Gentrification (draining of diversity, loss of neighborhood/cultural identity)-1
2	**Homeownership Opportunity-3
2	**Housing instability, multiple moves-5
2	**Late night shelters-2
2	**Older people live longer and need new careers, cannot afford to retire-3
2	**Project-based 0-30% units-2
1	*Add Max station gate fares-4
1	*Build affordable tiny homes, Eugene example Square One villages -5
1	*Bus system-1
1	*Business need grants and loans-3
1	*College programs through some sources-1
1	*Community engagement-2
1	*Conflict bikes and car safety-4
1	*Elderly cannot afford to transport or hire waste disposal or cannot lift it-2
1	*Grocery stores, access to healthy foods-3
1	*Improve job training by working w/High Schools and colleges-3
1	*Lack of streets, sidewalks (Cully)-1
1	*Less policing-1
1	*Most of the trash if from low income residents because people cannot afford trash (service) so they dump (trash) next to camps-2
1	*Outside-In services-1
1	*Places to put garage and human waste-2
1	*Private landlord discrimination-5
1	*Public toilets-2
1	*Rents too high (Rockwood)-1
1	*Short term rental assistance-2
1	*Wapato empty-1
1	*We do not need an Art Tax-3
1	Store front grants help community-3

Community Needs Meeting  
November 13, 2018  
5:45 PM – 7:45 PM  
Gresham Library

**Facilitators:** Laurie Wells, Rachel Nehse, Sydney Roberts, Jose Ibarra, Brian Monberg, Kim McCarty

**Gresham City Councilors:** Karylenn Echols, Janine Gladfelter

**Participants:** 5 Gresham Residents, 12 Service Providers, 1 Wood Village Employee, 1 Rockwood Disabled Resident, 1 Gresham Senior Disabled Resident, 2 Fairview Residents, 1 Fairview Disabled Resident, 1 Portland Housing Bureau Employee (24 Total)

### Summary

Attendees participated in small group discussions to share their experiences in the community with City and County staff. Facilitators asked a series of questions to gather input and prioritize community needs regarding housing, infrastructure, economic opportunity and other services. While attendees shared their ideas and experiences, facilitators took notes to accurately record and summarize the groups' discussions. Following the discussion each participant was given three stickers to add to their group's notes to vote for items they felt were the highest priorities. Overall 21 attendees participated in voting with a total of 63 votes.

Participants emphasized housing needs as the highest priority throughout the group discussions and gave 38 votes (60% of the total votes) prioritizing housing issues.

- Attendees highlighted the lack of affordable housing, high move-in costs, and the stigma around multi-family or low-income housing.
- Participants shared their experiences with unfair treatment from landlords and emphasized the need for advocacy and communication with landlords and property management.
- Discussions called attention to senior citizen's housing needs and their increased vulnerability due to rising rents and property taxes. Seniors are often on fixed incomes and cannot afford drastic increases in their expenses. Many programs to prevent homelessness are only available to families with children.

The need for additional community services received a total of 11 votes (18%) votes from participants.

- Participants identified activities for youth as an area of high need and noted the closing of Skate World has had a negative impact on the community. The group suggested improved and additional parks and a new community center.
- Increased housing costs have highlighted the need for affordable healthcare, as many citizens cannot afford both and are going without medical care so they can afford rent.

Attendees discussed the lack of economic opportunities and jobs available in the area, which received 7 votes (11%) prioritizing this issue.

- Participants highlighted the lack of jobs, especially living wage jobs, in the Gresham area and noted that many historical employers have left the area due to increasing rents.
- Attendees suggested the City partner with community colleges and local businesses to create career pathways for youth to receive training and get connected with jobs upon program completion.

Participants expressed concern over necessary infrastructure improvements and gave 7 votes (11%) to these issues.

- Street improvements including better lighting, improved signage, additional flashing beacon cross walks, pothole repairs and increased parking were identified as areas of need by participants.
- Participants noted certain low-income neighborhoods lack grocery stores, making it difficult for residents to buy affordable food for their families.

**Question 1- Community Experience:** *What changes did you see in your city and/or neighborhood that contribute to a positive community experience? What changes did you see in your city and/or neighborhood that contribute to a negative community experience?*

### Positive

- **Community Events:** Events like the Saturday Markets, Teddy Bear Parade and movies in the park give families fun, free local events to attend. Monthly community meetings with organizations like Unlimited Choices, HomeForward, attorneys or DIY Weatherization provide useful information to community members. Participants noted that they would appreciate other services being linked with these events.
- **Safety:** Residents feel safe and the community is welcoming to newcomers. Rockwood residents noted a decrease in crime in the Rockwood area. Neighborhood watch groups increase security because community members look out for each other's property. **(2 Votes)**
- **Activities for Youth:** The addition of the Boys & Girls Club has given Gresham youth a safe place to go after school.
- **Community Gardens:** Residents who may not otherwise have access to fresh fruit and vegetables can participate for a low fee. Many low-income residents live in apartments and would not have the option of growing their own food without these gardens.
- **Energy Efficient Units:** These units reduce the cost of energy for the resident.
- **Access to Help & Services:** The ability to get help from the Gresham community increases stability and alleviates stress. For example, the Hometown Field helps families with children. Social connections to the community are important. Participants also mentioned the County Libraries, Meals on Wheels, food services available to homeless residents and community classes as positive additions to the community.
- **Access to MAX:** MAX provides reliable transportation to residents that may not otherwise have access.
- **Long Term Residents:** Gresham has a community of long-term residents who are invested in the City.

### Negative

- **Activities for Youth:** There is a high need for more safe activities for youth, such as skate parks or more movies in the park. Activities like sports aren't offered year-round and can be very expensive, making them inaccessible to low-income residents. Rockwood offers some activities, but community members do not feel safe sending their kids there. Skate World was an example of this, but it closed. The skate park was a safe, fun activity for local youth. The group agreed that a new park for kids to skate in would be a positive addition to the community. **(6 Votes)**
- **Homelessness & Lack of Shelters:** There is an increase in homelessness and people living on the streets. The only shelter in the area has been closed and there is an increasing need for homeless shelters as rents begin to rise and more residents are being pushed farther East.
- **Traffic:** Increasing population has resulted in increased traffic and congestion, as well as more wear and tear on roads. **(1 Vote)**
- **Old Buildings:** Buildings are built to old codes with inadequate lighting and old or inadequate safety features such as fire hydrants and emergency exits. **(1 Vote)**
- **High Rent:** Excessive rent hikes due to increased population and demand for affordable housing.
- **Public Transportation:** There is a lack of public transportation, particularly in certain neighborhoods.
- **Parks & Playgrounds:** The area needs more parks and the area around Willow Tree could benefit from a playground. **(1 Vote)**

**Question 2- Community Services Needed:** *Are community services in your city and/or neighborhood adequate? If not, what is missing? (Community services can include: recreation activities, social services, parks programs, etc.)*

- **Activities for Youth:** The group brought up Skate World and noted again that a replacement park and the addition of other activities, parks or centers for Gresham kids is an area of need.
- **Park Improvements:** Gresham and East County have a lack of parks and would benefit from additional parks as well as improvements to existing parks. The group liked park events such as movies in the park but noted that these events should be paired with more information about local service providers.
- **Community Center:** Gresham is lacking a community center for local residents.
- **Rent Assistance:** There is a high need for rent assistance resources. Many residents are rent burdened with half their monthly income going to their rent. **(1 Vote)**
- **Health Care:** Decreases in health care benefits are leaving residents without proper medication. Many renters have to choose between paying rent and paying for medical care, so their health is suffering. Often resident's health insurance through work doesn't cover basic necessities such as diabetes treatment. Citizens could benefit from health care programs for low-income, seniors and emergency services. **(1 Vote)**
- **Lack of Low-Income Housing:** Many units that were previously low-income units are being converted into market rate, so they are no longer affordable.
- **Job Training:** Training opportunities for residents could help increase their wages.
- **Food Desert:** Many neighborhoods, including Rockwood, lack affordable grocery stores, making groceries inaccessible and unaffordable for low income residents. **(1 Vote)**

**Question 3- Economic Opportunity:** *What economic development activities would you like to see in your city and/or neighborhood? (Economic development can include: job training, job creation, micro-enterprise projects, improvements to business store fronts, etc.)*

- **Job Training for Youth:** The City could partner with local community colleges to create pathways for local youth to receive job-specific training. Additionally, the City could partner with local businesses to help connect students with jobs once they have completed the community college program. **(3 Votes)**
- **Food Deserts:** Particularly in the low-income Rockwood area there is a lack of grocery stores to supply residents with affordable, healthy food. Many residents turn to unhealthy alternatives and/or overpay for groceries at expensive convenience stores.
- **Lack of Housing:** An increase in population in Gresham and East Multnomah County has increased demand for housing. The area lacks affordable units and this makes it so that low-wage workers in Gresham have difficulty affording rent in the community they work in. Rents should be more consistent with income levels. **(1 Vote)**
- **More Bus Routes:** Many low-income residents rely on public transportation to get to work. A lack of bus routes in certain neighborhoods limits the opportunities for residents in those neighborhoods to get and maintain employment.
- **Store Improvements & Nightlife:** Rehabilitating old run-down stores to make them nicer may help with economic development in the area. Participants noted that Gresham currently has no nightlife and may benefit from additional and/or improved businesses.
- **Rockwood Rising:** This project should bring more jobs and opportunities to the Rockwood neighborhood.
- **Transitional Training Programs:** People retiring would train new staff to take over for them instead of leaving and taking all of their knowledge with them.
- **Home Ownership:** Programs to help low income residents become homeowners. **(3 Votes)**
- **Job Opportunities:** Gresham is lacking in job opportunities. Most jobs are in Portland, which forces workers to commute. Many jobs in Gresham are minimum wage and higher paid opportunities are unavailable, which limits opportunities for low-income residents. Additionally, many historic employers

have left the area, which decreases available jobs. For example, the tamale factory employed many Gresham residents, but had to close due to commercial rent increases. **(4 Votes)**

**Question 4- Infrastructure Improvements:** *What infrastructure improvement projects do you think are needed in your community? (Infrastructure improvements include: more lighting, street improvements, sidewalks, pedestrian crossings, park projects, etc.)*

- **Parking:** Participants expressed concern about increasing demand for parking as new developments come into the area and the population continues to increase. Zoning for new developments should be looked at to see how new projects will impact parking. The area has many narrow streets with street parking that makes it difficult for vehicles to get through. Wider streets would help alleviate this problem.
- **Street Improvements:** Many streets are in disrepair and during the winter it can be difficult to see potholes because it is dark and they fill with water. This is an issue city-wide, but the groups specifically called out Division Street and Sandy Blvd as areas of concern. The groups specifically mentioned a need for more flashing beacon crossings, better lighting, improved signage and more sidewalks. Many streets are currently unsafe to walk at night and people have sustained life changing injuries due to the poor visibility. **(3 Votes)**
- **Grocery Stores:** Many neighborhoods where working people live lack adequate grocery stores.
- **Prevention Programs:** Gresham needs prevention programs to reduce the vandalism in the City's parks, specifically the Japanese park.
- **Public Facilities:** Additional public restrooms would be helpful for visitors to the area. Public showers could be helpful to the homeless community.
- **Community Center:** The Gresham area could benefit from a community center. **(2 Votes)**
- **Better Bus Stations:** Many bus stations are not covered, which makes them less accessible to families with children in certain weather. Stations are also often too crowded and bus fares can be too expensive for low-income families.

**Question 5- Barriers to Housing & Housing Discrimination:** *Do you know of anyone who has experienced barriers to housing choice or housing discrimination? How does this impact the community as a whole?*

- **Senior Citizen Renters:** There is an increased need for housing for seniors in the area. Many local landlords will look for reasons to evict seniors or will drastically increase rents, making their units unaffordable for seniors living on fixed incomes. Homeless seniors have different needs than other homeless citizens, which creates even more barriers for them. Shelters are often inaccessible for seniors, who may not be able to get up onto a bunk bed. Additionally, there is a lack of resources for them. Many programs are aimed at families with children or single parents, so they cannot apply for help through these programs. **(3 Votes)**
- **Senior Citizen Homeowners:** Increase in property values in the area has caused an increase in property taxes. Seniors who own their homes and are on a fixed income may not be able to afford the increased taxes, putting them at risk for homelessness. **(2 Votes)**
- **Low Income Families & Move-in Costs:** Many families who may be able to afford an apartment still cannot find a place to rent because landlords will require 2 times the rent as a deposit. Landlords may also force low income families to sign longer term leases that they may not be able to commit to. If the family can find a unit to rent, move-in costs deplete all their resources. **(5 Votes)**
- **Stigma Around Multi-Family Housing:** There is a negative perception around "affordable" or multi-family housing projects. **(2 Votes)**

- **Homelessness:** Homelessness overall is increasing in the area due to rising rents and an increase in population as people from Portland get pushed East for more affordable housing. **(3 Votes)**
- **Advocacy & Communication with Property Managers:** Service providers who build relationships with their clients' property managers have an easier time keeping their clients housed. The property manager will be more likely to work with the service provider on behalf of the client when they have a positive relationship with the service provider. **(2 Votes)**
- **A Home for Everyone:** Concerns were brought up regarding how this money is being spent. **(1 Vote)**
- **Inconsistent Rent at Mobile Home Parks:** Spaces for a single wide are often equal to or more than spaces for a double wide, making it more difficult for smaller households to afford them.
- **Unfair Treatment from Landlords:** Landlords and/or property managers can be abusive and discriminate against tenants, especially those who are low-income or non-English speakers. Many Latino families have reported bullying and threats from their landlords to some of the service providers in the area. Landlords will use different eviction tactics to push these tenants out so they can hike up the rent and some have tried to increase rent on tenants while still in the middle of their agreement. Tenants are left demoralized and depressed. They feel unsafe as a result of discrimination and harassment from their landlords. **(2 Votes)**
- **Affordability:** There are fewer safe and affordable choices for low income families, especially those with children. There is increased competition for affordable units as more families are pushed East due to Portland's rising rents. Many residents, especially seniors, are going without necessities such as medical care and food in order to afford rent. **(10 Votes)**
- **No Jobs for Teens:** Teens are unable to get jobs, so they cannot help contribute financially to their families.
- **Housing for 50-80% MFI:** There is not enough regulated housing for 50-80% MFI households. The naturally affordable housing i.e. low-cost unregulated housing is becoming more scarce. **(1 Vote)**
- **Hidden Fees:** Credit issues can lead to increased move in costs, like a higher deposit. **(1 Vote)**
- **Landlords Picking Tenants:** CAT has confirmed issues with landlords processing multiple applications at once, then picking and choosing a single tenant. This creates a financial burden for all of the tenants who paid an application fee but are not chosen to rent and creates possible fair housing violations. Application fees are often \$35-50, which makes searching for an apartment expensive and unaffordable for low-income households.
- **Mold:** There is a lot of different information regarding mold and how to address it.
- **Mental Health:** Residents with mental health issues often get the police called on them. This can result in future rejections when applying for housing.
- **Navigating Laws & Resources:** Tenants may have a difficult time understanding their rights and/or accessing resources when they are being treated unfairly. Many tenants don't want to complain for fear of retaliation from their landlords. **(1 Vote)**
- **Lack of Childcare:** Gresham lacks childcare, especially for children with disabilities. Community members may have to travel to Portland to access services and/or childcare. The high cost of rent may also make childcare unaffordable to low-income families.



**Question 6- Priorities:** *Given our discussion of community services, economic development, infrastructure improvements, and housing choice, what are your top priorities? You each have 3 stickers to place on your highest priorities. You can use all on one priority or on multiple priorities.*

<b>Votes</b>	<b>Topic</b>
10	Affordable Housing (Question 5)
6	Activities for Youth (Question 2)
5	Low-Income Families & Move-In Costs (Question 5)
4	Job Opportunities (Question 3)
3	Homeownership (Question 3)
3	Job Training for Youth (Question 3)
3	Street Improvements (Question 4)
3	Senior Citizen Renters (Question 5)
3	Homelessness (Question 5)
2	Safety (Question 1)
2	Community Center (Question 4)
2	Senior Citizen Homeowners (Question 5)
2	Stigma Around Multi-Family Housing (Question 5)
2	Advocacy & Communication with Property Managers (Question 5)
2	Unfair Treatment from Landlords
1	Traffic (Question 1)
1	Old Buildings (Question 1)
1	Parks & Playgrounds (Question 1)
1	Rent Assistance (Question 2)
1	Healthcare (Question 2)
1	Food Desert (Question 2)
1	Lack of Housing (Question 3)
1	A Home For Everyone (Question 5)
1	Housing for 50-80% MFI (Question 5)
1	Hidden Fees (Question 5)
1	Navigating Laws & Resources (Question 5)



# Portland Housing Bureau

Mayor Ted Wheeler • Director Shannon Callahan

**Needs Hearing**

**May 7, 2019**

5:00 – 7:00pm

Portland Housing Bureau

421 SW 6<sup>th</sup> Ave., Ste 500

Portland OR, 97007

## May 7, 2019 Meeting Overview

**Staff Present:** Kim McCarty, Sawyer Sheldon, Matthew Tschabold

**Guest Presenters:**

<i>Agenda Topic</i>	<i>Key Topics Covered</i>	<i>Recording Time</i>
<b>Introduction</b>	<ul style="list-style-type: none"> <li>• Kim describes why this meeting is happening and what feedback PHB is looking for</li> <li>• Explains why they are looking for feedback on the Action Plan</li> <li>• Federal funding makes up about a quarter of PHB funds</li> </ul>	00:00:00 – 00:13:20
<b>Public Testimony</b>	<p><b>Josh Grows, Salvation Army</b></p> <ul style="list-style-type: none"> <li>• Contracts with JOHs</li> <li>• Concerned about cuts to budget, ~2%</li> <li>• Concerned about paying staff fair wages</li> <li>• Wants to know why Emergency Services only has \$3M</li> </ul>	00:13:47 - 00:18:00
	<p><b>Jennifer Phillips</b></p> <ul style="list-style-type: none"> <li>• Questions about funding for “persons with AIDS”</li> <li>• Asks about addiction services</li> <li>• Asks about construction site recycling policy</li> </ul>	00:18:15 – 00:24:04
	<p><b>Joyce</b></p> <ul style="list-style-type: none"> <li>• Wondering about NOFA and micro enterprise funds</li> <li>• Asks about the bond funds for development</li> </ul>	00:24:15 – 00:29:12
	<p><b>Allen Lazo, Fair Housing Council of Oregon</b></p> <ul style="list-style-type: none"> <li>• Wants to see how priorities break down for each funding source</li> </ul>	00:29:22 – 00:31:00
	<p><b>Danny</b></p> <ul style="list-style-type: none"> <li>• Wants to know how we can more existing housing affordable and how we can cap rent</li> </ul>	00:34:30 – 00:40:00

# City of Gresham – Recapture/Resale Policy

Updated – July 2019

## Introduction

The City of Gresham is a participating jurisdiction in HUD’s HOME Investment Partnerships Program. Federal regulations require the City to establish written recapture/resale policies that comply with HOME statutory and regulatory requirements for the purpose of carrying out HOME-assisted homeownership activities. These policies are set forth in the Annual Action Plan and clearly describe the recapture/resale provisions, the specific circumstances under which these provisions will be used, and how the City will enforce the provisions for HOME-funded homeownership projects. HUD reviews and approves the provisions as part of the annual Action Plan process.

The purpose of this section is to provide the policies for the City of Gresham’s HOME Investment Partnerships Program. The City of Gresham may use HOME funds for different types of programs to assist with single-family residences:

- Down Payment Assistance provided to new homebuyers;
- Community Land Trust acquisition of a parcel of land under an existing single-family home to provide affordable ownership.

## 2019 Homebuyer Projects

The City’s 2019 Action Plan includes two homebuyer projects:

- **Proud Ground** – HOME funds will be used to reduce the purchase cost for an estimated two households to purchase homes that will be held as permanently affordable in a community land trust. Locations TBD. <https://proudground.org/>
- **City of Gresham Shared Appreciation Mortgage Program WELCOME HOME** – HOME funds will be used to provide down payment assistance for an estimated 13 households. Locations TBD.

Proud Ground will be subject to City’s HOME resale policy and the WELCOME HOME program will be subject to the HOME recapture policy.

## General HOME Property Restrictions

For a homebuyer or homeowner to be eligible for HOME assistance, they must have a low to moderate income, at or below 80% of area median income, as provided by HUD. The household must be purchasing, constructing, or rehabilitating a home that they intend to maintain as their primary residence. Depending on the amount of HOME assistance provided to the residence, the property must remain affordable for the number of years indicated. If the property is sold during this time, or if it is no longer the primary residence of the household, the recapture/resale restrictions will be enforced.

HOME Assistance per-unit	Minimum period of affordability in years
Under \$15,000	5
\$15,000 to \$40,000	10
Over \$40,000	15

## **Recapture Policy**

### **The City of Gresham's HOME ownership program – WELCOME HOME**

The City of Gresham uses a “recapture” model for the WELCOME HOME program to assist homebuyers in the purchase of a new home. Under HOME recapture provisions, financial assistance is provided directly to the buyer or the homeowner and must be repaid, along with a portion of the share of appreciation, further described below, if the property is sold during the affordability period. The seller may sell the property to any willing buyer at any price. Once the HOME funds are repaid to the City of Gresham, the property is no longer subject to any HOME restrictions. The funds returned to the City of Gresham may then be used for other HOME-eligible activities.

**Homeownership Program.** The City of Gresham created a Home Ownership Program(WELCOME HOME) in 2015 that provides down payment assistance in the form of shared appreciation mortgages to eligible homeowners. When assistance is provided as part of the WELCOME HOME Program, the City will use a recapture model and HOME assistance will be provided in the form of a 0% interest, deferred payment loan. The maximum amount of assistance that will be provided on any one property is \$20,000. Underwriting will be conducted on each property to determine the amount of subsidy to contribute to each household. A written agreement, signed by all parties, in the form of a Promissory Note and Shared Appreciation Mortgage (SAM), will serve as the security for these loans. The SAM will be recorded in the land records of Multnomah County. The period of affordability (POA) will be for a term of ten (15) years. If the property is sold within the period of affordability, the full amount of the SAM and potentially a share of appreciation will be due to the City of Gresham. If the property is sold from years 10 – 15, the principal balance of the SAM will be reduced by 20% each year. At the end of the term of the SAM, the entire SAM is forgiven.

**Sale of Properties.** Upon sale of the property within the affordability period, the SAM will be repaid as follows:

If the property is sold in the affordability period, between years 1 – 10, the sale of proceeds will be distributed as follows:

- Repayment of the balance of the First Deed of Trust and other superior liens
- Payment of reasonable closing costs
- Net Proceeds = Sales Proceeds less repayment of the above amounts

Distribution of the Net Proceeds:

- Net Proceeds less

- Principal Balance of SAM
- Reimbursement to borrower in amount of principal pay down First Deed of Trust
- Reimbursement to borrower of down payment made at the time of purchase
- Reimbursement to borrower of any approved capital improvements
- Share of Appreciation Amount = Net Proceeds less payment of above amounts
- Share of Appreciation to City = Share of Appreciation \* (Amount of SAM / Original Purchase Price of Home)

The amount recaptured by the City will not exceed the Net Proceeds.

If the property is sold between years 11 – 15, the sale of proceeds will be distributed as follows:

- Repayment of the balance of the First Deed of Trust and other superior liens
- Payment of reasonable closing costs
- Repayment of SAM reduced by 20% during each successive year (Year 11, 80% of principal, Year 12, 60% of principal, Year 13, 40% of principal, Year 14, 20% of principal, Year 15, 0% of principal).

The SAM will be 100% forgiven if the property is sold any time after fifteen years or later.

**Approved Senior or Junior Liens used for Financing.** Third party financing of the property through a Deed of Trust or mortgage that is a senior or junior lien on the property is not permitted to restrict the sale of property to income eligible buyers. If the third party financing charges interest, it must only charge a reasonable interest rate and accept monthly payments or allow interest to accrue with payment due at the maturity date. Financing models may not use equity share models unless approved in writing by the City of Gresham.

**When The Sale Price is Insufficient for Shared Appreciation**

If the amount of the sale is insufficient to fully satisfy the amounts the HOME assistance amount, the City of Gresham may not personally seek or obtain a deficiency judgment or any other recovery from the Borrower/Seller.

**Calculation of the SAM Repayment and Share of Appreciation**

See the following chart for instructions on how to calculate the repayment of the SAM and the share of appreciation once a HOME funded property is sold.

**SHARED APPRECIATION PAYOFF CALCULATION**

1. SALE PRICE \$ \_\_\_\_\_ **BALANCE**
2. PRINCIPAL BALANCE (-) \$ \_\_\_\_\_ \$ \_\_\_\_\_
3. REASONABLE CLOSING COSTS (-) \$ \_\_\_\_\_ \$ \_\_\_\_\_
4. NET PROCEEDS \$ \_\_\_\_\_ \$ \_\_\_\_\_
5. SAM Principal

- 10	Amount of SAM
- 15	- 80% of principal
	- 60% of principal
	- 40% of principal
	- 20% of principal
	- 0 % of principal

(-) \$ \_\_\_\_\_  
\$ \_\_\_\_\_

6. Original loan amount of First Deed of Trust \$ \_\_\_\_\_
7. Ending balance of First Deed of Trust \$ \_\_\_\_\_
8. Principal Pay Down \$ \_\_\_\_\_ → (-) \$ \_\_\_\_\_ \$ \_\_\_\_\_
9. Homeowner's down payment (-) \$ \_\_\_\_\_ \$ \_\_\_\_\_
10. Homeowner's approved capital improvements (-) \$ \_\_\_\_\_  
\$ \_\_\_\_\_
11. Shared Appreciation Total \$ \_\_\_\_\_ \$ \_\_\_\_\_

12. City's Share of Appreciation = SAM  
----- x Share of Appreciation Total

Original Purchase Price

City's Share of Appreciation = ----- x = \$ \_\_\_\_\_  
\$ \_\_\_\_\_

Sums to City: #5 + # 12

Sums to Borrower: #8, #9, #10 and balance

The amounts due to City and Borrower should be described in the escrow instructions.

## **Resale Policy**

The City of Gresham's Resale policies ensure that HOME-assisted units remain affordable throughout the entire affordability period. The Resale method is used in cases where HOME funding is invested directly into a property, through a developer or nonprofit subrecipient. The HOME funds are used to reduce development or acquisition costs making the price of the home affordable to an eligible buyer.

Specific examples where the City would use the resale method for homeowner assistance include:

1. Providing HOME funds for construction materials and/or labor.
2. Providing HOME funds to reduce the purchase cost for a home that will be held as long-term affordable by Proud Ground in a community land trust.

## **Resale Policy Notification to Prospective Buyers**

The resale policy is explained to prospective homebuyers prior to signing a contract to purchase a HOME-assisted unit. The prospective homebuyers sign an acknowledgement stating that they understand the terms and conditions applicable to the resale policy as they have been explained. This document is included with the executed sales contract. (See attached Notification for Prospective Buyers.)

## **Enforcement of Resale Restrictions**

The resale restrictions are enforced through the use of a HOME written agreement between the City, homebuyer, and subrecipient; a deed of trust securing the City's HOME loan; and a covenant signed by the homebuyer at closing. These documents will specify:

1. The length of the affordability period (based on the dollar amount of HOME funds invested in the unit; either 5, 10, or 15 years);
2. That the home remain the Buyer's principal residence throughout the affordability period; and
3. The conditions and obligations of the Owner should the Owner wish to sell before the end of the affordability period, including:
  - a. The Owner must contact the City of Gresham in writing if intending to sell the home prior to the end of the affordability period;
  - b. The subsequent purchaser must earn no more than 65% of the area median income for Gresham, and occupy the home as their primary residence for the remaining years of the affordability period. (If the new purchaser requires any additional HOME assistance, the affordability period will be reset according to the amount of assistance provided); and
  - c. The sales price must be affordable to the subsequent purchaser; affordable is defined as limiting the Principal, Interest, Taxes, and Insurance (PITI) amount to no more than 35% of a household's income who earns between 50% and 65% of the area median income for Gresham.

Enforcement of the resale policy will end upon expiration of the affordability period. If at any time during or after the affordability period a HOME-assisted community land trust home is removed from the land trust, the original HOME investment must be repaid by the subrecipient agency.

### **Affordability to a Range of Buyers**

Using the resale method, the City will ensure continued affordability to a range of buyers, particularly those whose total household incomes is between 50 and 65% of area median income. Sales prices shall be set such that the amount of Principal, Interest, Taxes, and Insurance does not exceed 35% of a household's income who earns between 50% and 65% of the area median income. Subrecipients may provide additional subsidy to make the home affordable to buyers below 50% AMI.

### **Fair Return on Investment**

The City of Gresham will administer the resale restrictions to ensure that the Owner receives a fair return on investment and that the home will continue to be affordable to households whose income does not exceed 65% of area median income.

The resale formula used by City of Gresham provides a fair return to the homeowner at resale, based on an objective standard that is publicly accessible and can be easily measured, both at the time of initial purchase and at resale.

City of Gresham uses an appraisal-based resale formula to achieve its dual goals of providing a fair return to the original homeowner/seller at resale and ensuring an affordable price to the incoming, low-income homebuyer.

The resale formula stipulates that the homeowner, should they choose to sell, will be able to sell the home for the original price paid, plus 25% of any increase in the combined appraised value of the home and the land during the time of ownership. **The homeowner will receive a credit for any down payment, earnest money, IDA, etc. they contributed as part of the total funds they receive upon sale.** Additionally, at resale, the homeowner is allowed to receive an equity "credit" for qualified capital improvements made, as follows:

- 100% of the increase in appraised value attributable to the addition of one or more bedrooms and one or more bathrooms; and
- 50% of the cost of major systems replacement within five years prior to resale. This does not include repairs but is for upgrades or improvements that do not typically increase market value in an appraisal but do increase a home's useful life (i.e., roof, furnace, electrical system).

### **Fair Return at Resale Example**

Here is an example of how the resale formula is designed to work, using hypothetical market conditions:

#### **At initial purchase:**

\$250,000	Market value of land and improvements, as determined by appraisal at initial purchase
<u>(\$ 70,000)</u>	HOME affordability subsidy
\$180,000	Purchase price of home paid by homebuyer

#### **At resale – 10 years later:**

\$310,000	Market value of land and improvements, as determined by appraisal at time of resale
\$60,000	Increase in value of land and improvements from initial purchase to resale, as determined by appraisal (\$310,000 minus \$250,000)

#### **Equity earned by homeowner/seller at resale:**

\$15,000	Homeowner's dollar value of appreciation, per resale formula (\$60,000 x 25% - \$15,000)
\$12,500	Credit for qualified capital improvements made by homeowner



\$5,000	Credit for down payment (earnest money, IDA, etc.)
<u>\$33,846</u>	Equity earned by homeowner by amortization of mortgage after 10 years <sup>1</sup>
\$66,346	Total equity earned by homeowner/seller at resale (\$15,000 share of appreciation + \$12,500 credit for qualified capital improvements + \$5,000 initial down payment + \$33,846 equity earned through mortgage amortization)

**Sale price to next buyer:**

\$207,500	Purchase price paid by incoming low-income homebuyer: \$180,000 (initial affordable purchase price) plus \$15,000 (paid to original homeowner as share of appreciation) plus \$12,500 (paid to original homeowner as a credit for capital improvements).
-----------	--

In this example, the City determined that the sales price would have to be between \$150,000 and \$250,000 (amount of mortgage principal, interest, taxes and insurance of not more than 35% of the gross monthly income for a household between 50% and 65% of area median income). The home – a property that now has an appraised market value of \$310,000– is sold to an eligible low-income household for an affordable price of \$207,500 without requiring investment of additional subsidies.

By using a market rate (fee simple) appraisal conducted by an independent, state-licensed appraiser to establish the value of the property prior to the initial purchase of the home, the City of Gresham follows the standard practice for all real estate purchase transactions. By obtaining a new market rate fee simple appraisal, upon notice of intent to sell by the homebuyer, the City ensures that standard methods for determining property values are always used. In this way, market values are easily measured, professionally determined, and publicly accessible. No subjective judgments are made by the City or the homeowner as to what constitutes value and how value is determined.

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<sup>1</sup> Assuming 5%, fixed-rate, 30-year mortgage loan of \$179,500 to original homeowner.

## NOTIFICATION TO PROSPECTIVE BUYER

This notification is provided to \_\_\_\_\_ who is/are purchasing a home with the assistance of HOME Investment Partnerships Program funding administered through City of Gresham, by and through the HOME Investment Partnerships Program, 1333 NW Eastman Parkway, Gresham, OR 97030.

THEREFORE, IT IS MUTULLY AGREED as follows:

1. City of Gresham provided HOME funds in the form of a loan to \_\_\_\_\_ for the acquisition of a house located at \_\_\_\_\_.
2. The U.S. Department of Housing and Urban Development (HUD) Affordability Period (24 CFR Part 92.254(4)) is 15 years, from the date the deed is signed.
3. Resale provisions are applicable for this residence assisted with HOME funds when the property does not continue to be the principal residence of the household for the duration of the 15 Year Home Affordability Period. The Buyer shall annually certify that they continue to use the house as their principal residence.
4. If the Buyer does not continue to occupy the home as his/her principal residence during the Affordability Period, as defined above, or sells the property during the Affordability Period, the following resale provision shall be followed:

Upon sale of the property by the initial homeowner and each successive homeowner during the affordability period, the homeowner must receive a "fair return" on their investment. Fair Return is defined as the original price paid, plus twenty-five percent (25%) of the appreciation, plus qualified improvements as follows:

- 100% of the increase in appraised value attributable to the addition of one or more bedrooms and one or more bathrooms; and
- 50% of the cost of major systems replacement within five years prior to resale. This does not include repairs but is for upgrades or improvements that do not typically increase market value in an appraisal but do increase a home's useful life (i.e., roof, furnace, electrical system); and
- Credit for any down payment at time of purchase (including IDA, earnest money, etc.).

Appreciation is defined as the increase in the combined appraised value of the home and the land from the time of purchase to the time the owner sells the house. The fair return will only apply to sales during the HOME affordability period.

The house must be made available for subsequent purchase only to qualified low-income buyers who will use the house as their principal residence. "Low-income" mean a household income not exceeding 80% of the area median income as established by HUD, adjusted for household size, at the time of home purchase. Each subsequent buyer, during the HOME Affordability Period, shall not pay more than 35% of the gross income of a household at 80% of area median income for mortgage payments including principal and interest, property taxes, and homeowner's property insurance.

By signing below, the Buyer understands and agrees to the terms contained in this notification.

Buyer: \_\_\_\_\_

Date: \_\_\_\_\_



## CERTIFICATIONS

In accordance with the applicable statutes and the regulations governing the consolidated plan regulations, the jurisdiction certifies that:

**Affirmatively Further Fair Housing** --The jurisdiction will affirmatively further fair housing.

**Uniform Relocation Act and Anti-displacement and Relocation Plan** -- It will comply with the acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended, (42 U.S.C. 4601-4655) and implementing regulations at 49 CFR Part 24. It has in effect and is following a residential anti-displacement and relocation assistance plan required under 24 CFR Part 42 in connection with any activity assisted with funding under the Community Development Block Grant or HOME programs.

**Anti-Lobbying** --To the best of the jurisdiction's knowledge and belief:

1. No Federal appropriated funds have been paid or will be paid, by or on behalf of it, to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement;
2. If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, it will complete and submit Standard Form-LLL, "Disclosure Form to Report Lobbying," in accordance with its instructions; and
3. It will require that the language of paragraph 1 and 2 of this anti-lobbying certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly.

**Authority of Jurisdiction** --The consolidated plan is authorized under State and local law (as applicable) and the jurisdiction possesses the legal authority to carry out the programs for which it is seeking funding, in accordance with applicable HUD regulations.

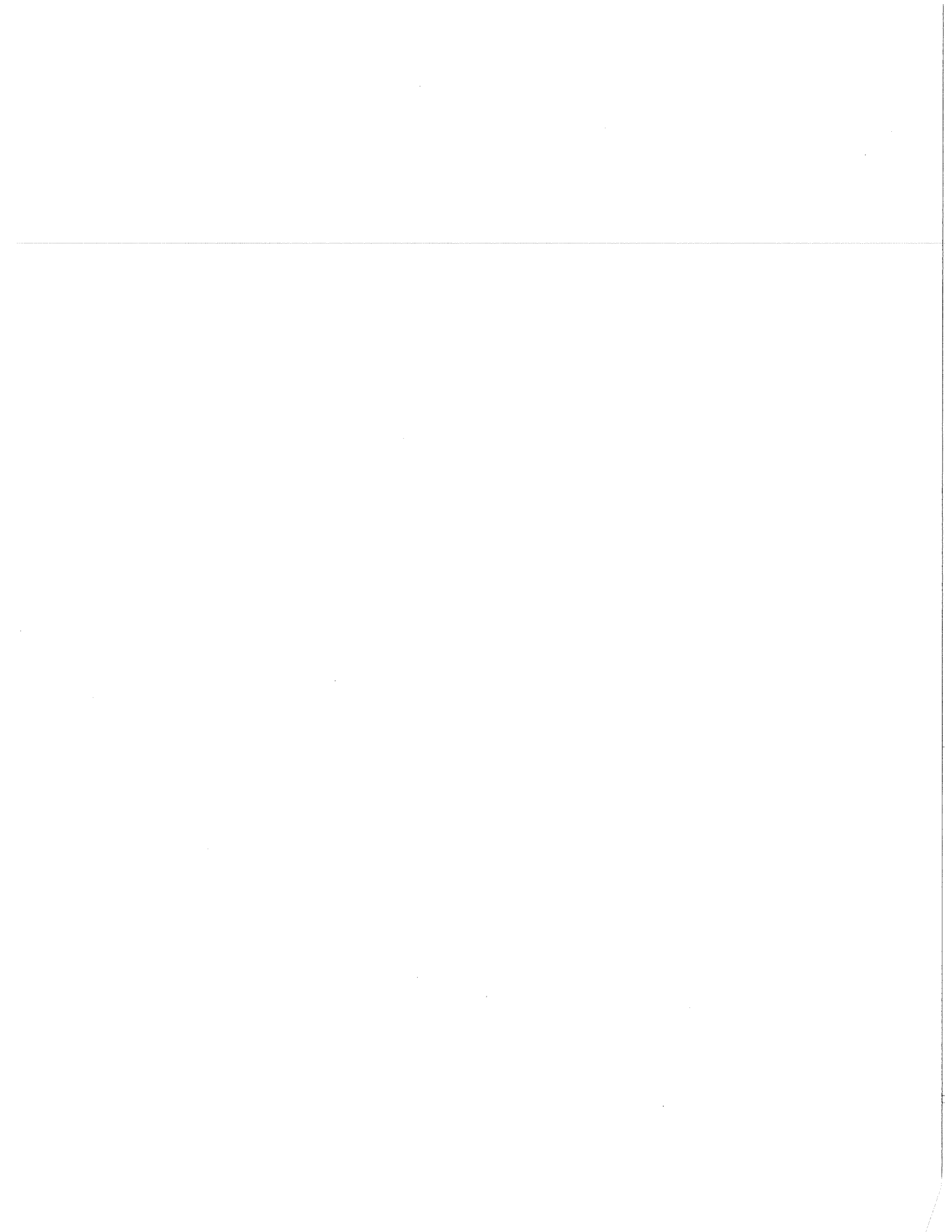
**Consistency with plan** --The housing activities to be undertaken with Community Development Block Grant, HOME, Emergency Solutions Grant, and Housing Opportunities for Persons With AIDS funds are consistent with the strategic plan in the jurisdiction's consolidated plan.

**Section 3** -- It will comply with section 3 of the Housing and Urban Development Act of 1968 (12 U.S.C. 1701u) and implementing regulations at 24 CFR Part 135.

  
\_\_\_\_\_  
Signature of Authorized Official

6/17/15  
\_\_\_\_\_  
Date

\_\_\_\_\_  
Mayor  
\_\_\_\_\_  
Title



## Specific Community Development Block Grant Certifications

The Entitlement Community certifies that:

**Citizen Participation** -- It is in full compliance and following a detailed citizen participation plan that satisfies the requirements of 24 CFR 91.105.

**Community Development Plan** -- Its consolidated plan identifies community development and housing needs and specifies both short-term and long-term community development objectives that that have been developed in accordance with the primary objective of the CDBG program (i.e., the development of viable urban communities, by providing decent housing and expanding economic opportunities, primarily for persons of low and moderate income) and requirements of 24 CFR Parts 91 and 570.

**Following a Plan** -- It is following a current consolidated plan that has been approved by HUD.

**Use of Funds** -- It has complied with the following criteria:

1. Maximum Feasible Priority. With respect to activities expected to be assisted with CDBG funds, it has developed its Action Plan so as to give maximum feasible priority to activities which benefit low- and moderate-income families or aid in the prevention or elimination of slums or blight. The Action Plan may also include CDBG-assisted activities which the grantee certifies are designed to meet other community development needs having particular urgency because existing conditions pose a serious and immediate threat to the health or welfare of the community, and other financial resources are not available (see Optional CDBG Certification).

2. Overall Benefit. The aggregate use of CDBG funds, including Section 108 guaranteed loans, during program year(s) 2019-2020 [a period specified by the grantee of one, two, or three specific consecutive program years], shall principally benefit persons of low and moderate income in a manner that ensures that at least 70 percent of the amount is expended for activities that benefit such persons during the designated period.

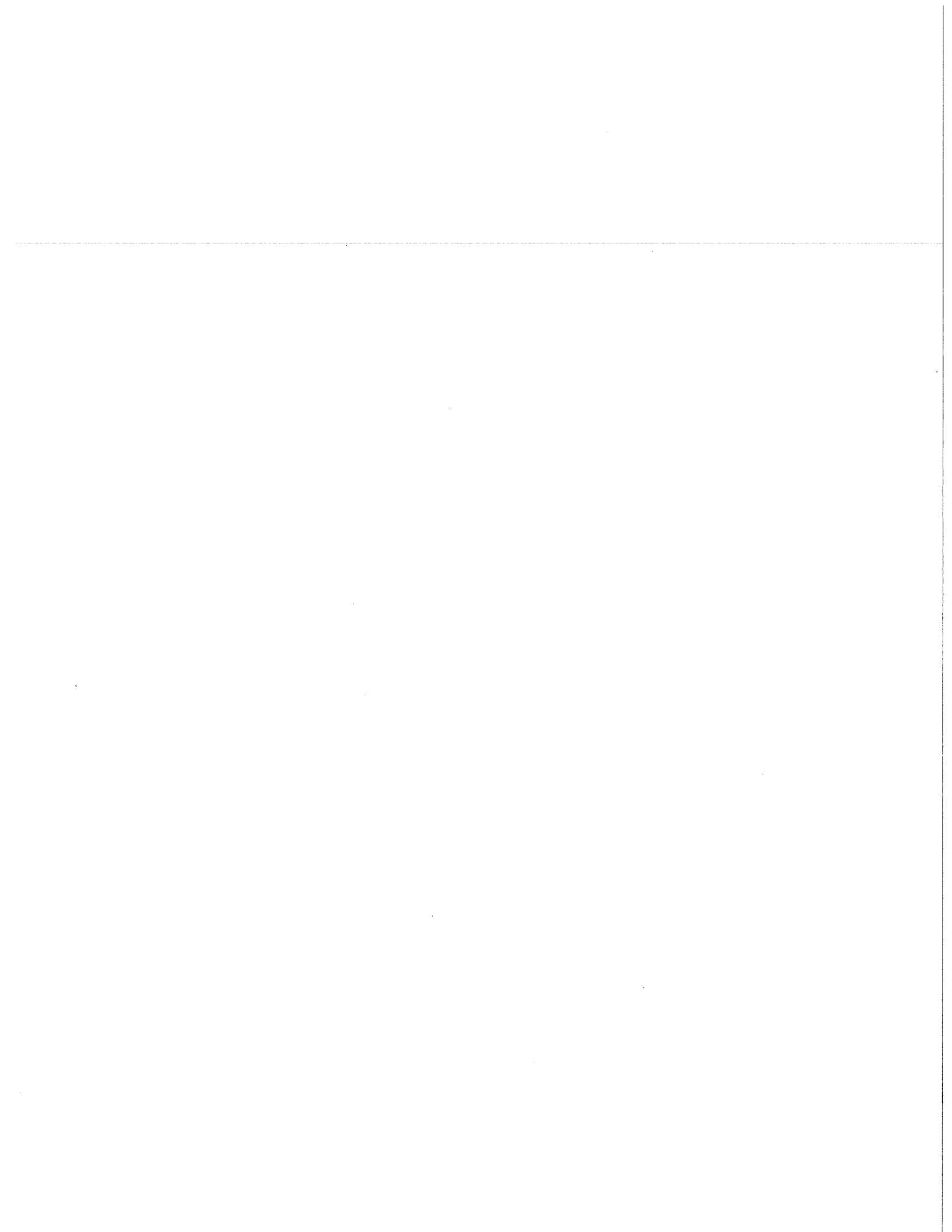
3. Special Assessments. It will not attempt to recover any capital costs of public improvements assisted with CDBG funds, including Section 108 loan guaranteed funds, by assessing any amount against properties owned and occupied by persons of low and moderate income, including any fee charged or assessment made as a condition of obtaining access to such public improvements.

However, if CDBG funds are used to pay the proportion of a fee or assessment that relates to the capital costs of public improvements (assisted in part with CDBG funds) financed from other revenue sources, an assessment or charge may be made against the property with respect to the public improvements financed by a source other than CDBG funds.

In addition, in the case of properties owned and occupied by moderate-income (not low-income) families, an assessment or charge may be made against the property for public improvements financed by a source other than CDBG funds if the jurisdiction certifies that it lacks CDBG funds to cover the assessment.

**Excessive Force** -- It has adopted and is enforcing:

1. A policy prohibiting the use of excessive force by law enforcement agencies within its jurisdiction against any individuals engaged in non-violent civil rights demonstrations; and
2. A policy of enforcing applicable State and local laws against physically barring entrance to or exit from a facility or location which is the subject of such non-violent civil rights demonstrations within its jurisdiction.

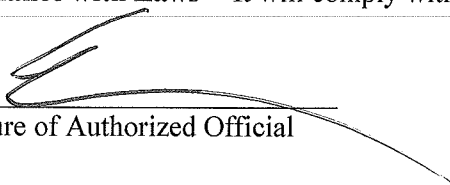




**Compliance with Anti-discrimination laws** -- The grant will be conducted and administered in conformity with title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d) and the Fair Housing Act (42 U.S.C. 3601-3619) and implementing regulations.

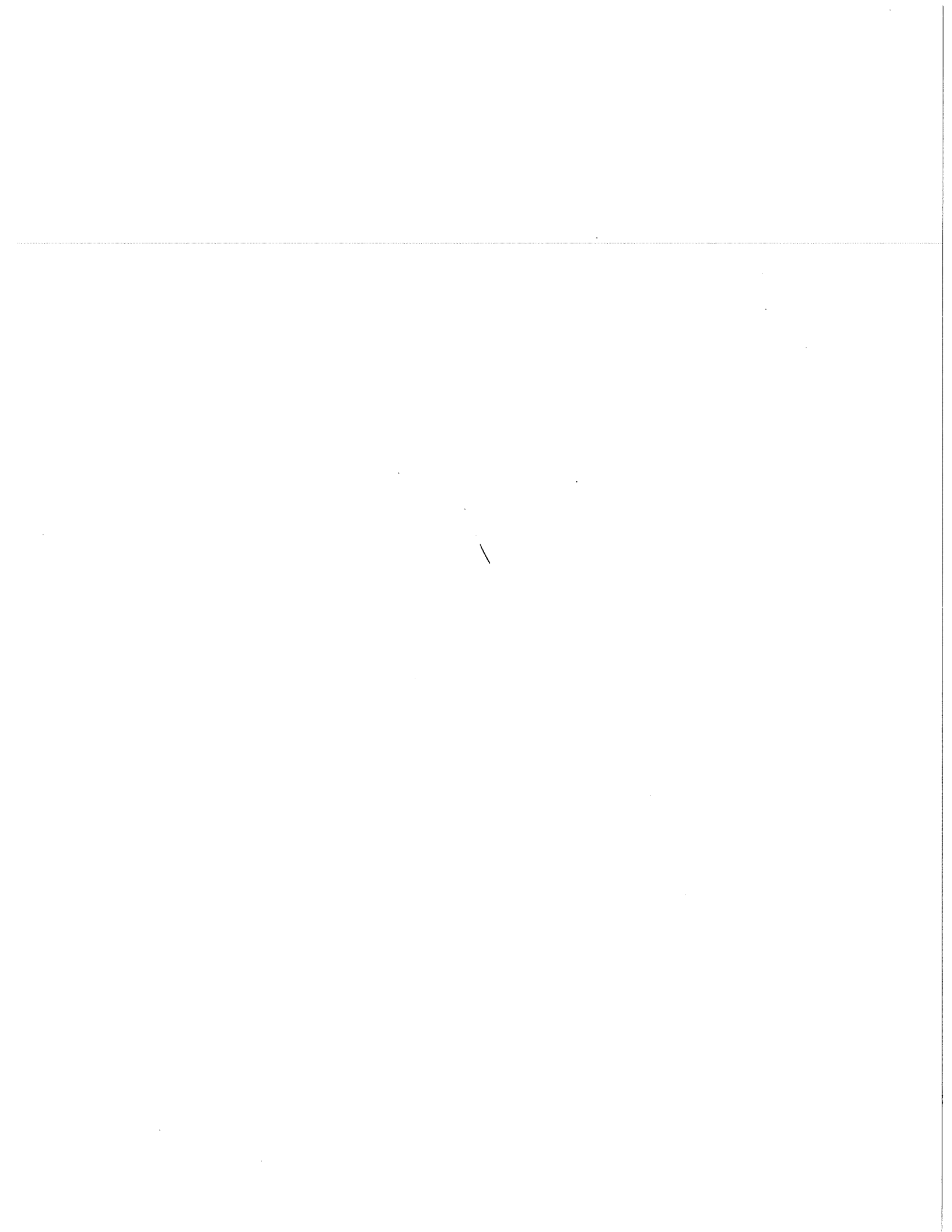
**Lead-Based Paint** -- Its activities concerning lead-based paint will comply with the requirements of 24 CFR Part 35, Subparts A, B, J, K and R.

**Compliance with Laws** -- It will comply with applicable laws.

  
\_\_\_\_\_  
Signature of Authorized Official

6/17/19  
Date

\_\_\_\_\_  
Mayor  
Title



**OPTIONAL Community Development Block Grant Certification**

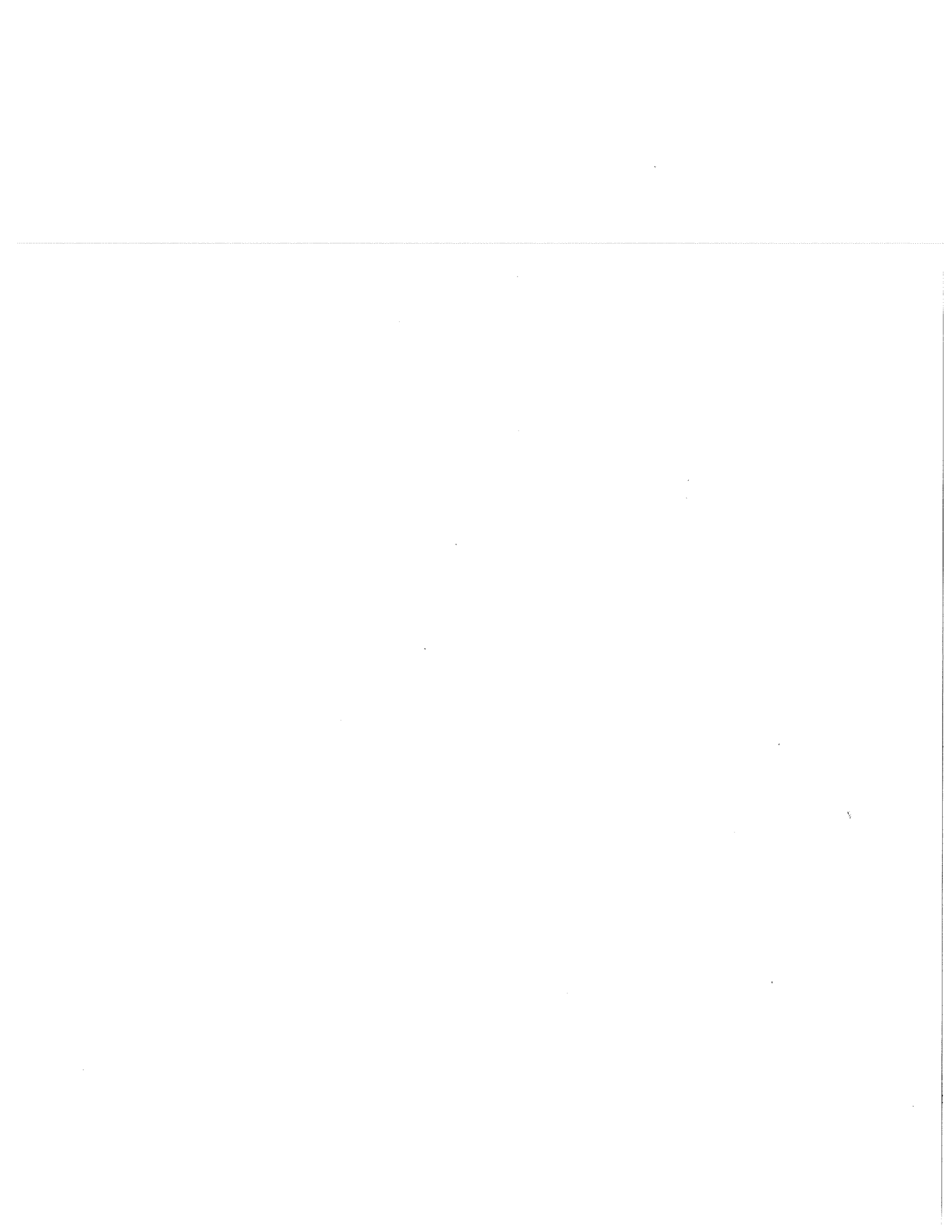
Submit the following certification only when one or more of the activities in the action plan are designed to meet other community development needs having particular urgency as specified in 24 CFR 570.208(c):

The grantee hereby certifies that the Annual Plan includes one or more specifically identified CDBG-assisted activities which are designed to meet other community development needs having particular urgency because existing conditions pose a serious and immediate threat to the health or welfare of the community and other financial resources are not available to meet such needs.

  
\_\_\_\_\_  
Signature of Authorized Official

6/17/19  
Date

Mayor  
Title



**Specific HOME Certifications**

The HOME participating jurisdiction certifies that:

**Tenant Based Rental Assistance** -- If it plans to provide tenant-based rental assistance, the tenant-based rental assistance is an essential element of its consolidated plan.

**Eligible Activities and Costs** -- It is using and will use HOME funds for eligible activities and costs, as described in 24 CFR §§92.205 through 92.209 and that it is not using and will not use HOME funds for prohibited activities, as described in §92.214.

**Subsidy layering** -- Before committing any funds to a project, it will evaluate the project in accordance with the guidelines that it adopts for this purpose and will not invest any more HOME funds in combination with other Federal assistance than is necessary to provide affordable housing;

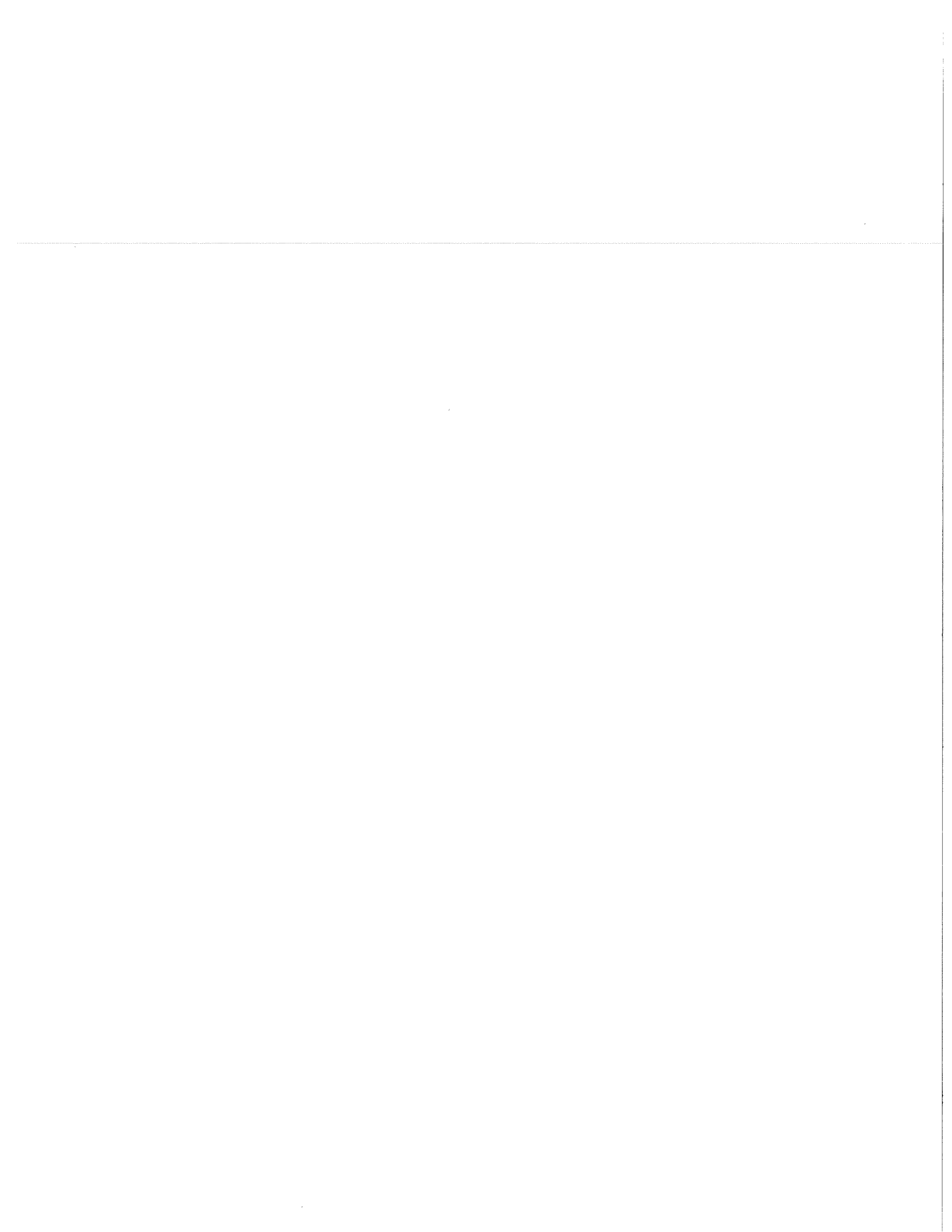


\_\_\_\_\_  
Signature of Authorized Official

6/17/19

\_\_\_\_\_  
Date

Mayor  
Title



## **Emergency Solutions Grants Certifications**

The Emergency Solutions Grants Program recipient certifies that:

**Major rehabilitation/conversion/renovation** – If an emergency shelter’s rehabilitation costs exceed 75 percent of the value of the building before rehabilitation, the recipient will maintain the building as a shelter for homeless individuals and families for a minimum of 10 years after the date the building is first occupied by a homeless individual or family after the completed rehabilitation.

If the cost to convert a building into an emergency shelter exceeds 75 percent of the value of the building after conversion, the recipient will maintain the building as a shelter for homeless individuals and families for a minimum of 10 years after the date the building is first occupied by a homeless individual or family after the completed conversion.

In all other cases where ESG funds are used for renovation, the recipient will maintain the building as a shelter for homeless individuals and families for a minimum of 3 years after the date the building is first occupied by a homeless individual or family after the completed renovation.

**Essential Services and Operating Costs** – In the case of assistance involving shelter operations or essential services related to street outreach or emergency shelter, the recipient will provide services or shelter to homeless individuals and families for the period during which the ESG assistance is provided, without regard to a particular site or structure, so long the recipient serves the same type of persons (e.g., families with children, unaccompanied youth, disabled individuals, or victims of domestic violence) or persons in the same geographic area.

**Renovation** – Any renovation carried out with ESG assistance shall be sufficient to ensure that the building involved is safe and sanitary.

**Supportive Services** – The recipient will assist homeless individuals in obtaining permanent housing, appropriate supportive services (including medical and mental health treatment, victim services, counseling, supervision, and other services essential for achieving independent living), and other Federal State, local, and private assistance available for these individuals.

**Matching Funds** – The recipient will obtain matching amounts required under 24 CFR 576.201.

**Confidentiality** – The recipient has established and is implementing procedures to ensure the confidentiality of records pertaining to any individual provided family violence prevention or treatment services under any project assisted under the ESG program, including protection against the release of the address or location of any family violence shelter project, except with the written authorization of the person responsible for the operation of that shelter.

**Homeless Persons Involvement** – To the maximum extent practicable, the recipient will involve, through employment, volunteer services, or otherwise, homeless individuals and families in constructing, renovating, maintaining, and operating facilities assisted under the ESG program, in providing services assisted under the ESG program, and in providing services for occupants of facilities assisted under the program.

**Consolidated Plan** – All activities the recipient undertakes with assistance under ESG are consistent with its consolidated plan.





**Discharge Policy** – The recipient will establish and implement, to the maximum extent practicable and where appropriate, policies and protocols for the discharge of persons from publicly funded institutions or systems of care (such as health care facilities, mental health facilities, foster care or other youth facilities, or correction programs and institutions) in order to prevent this discharge from immediately resulting in homelessness for these persons.

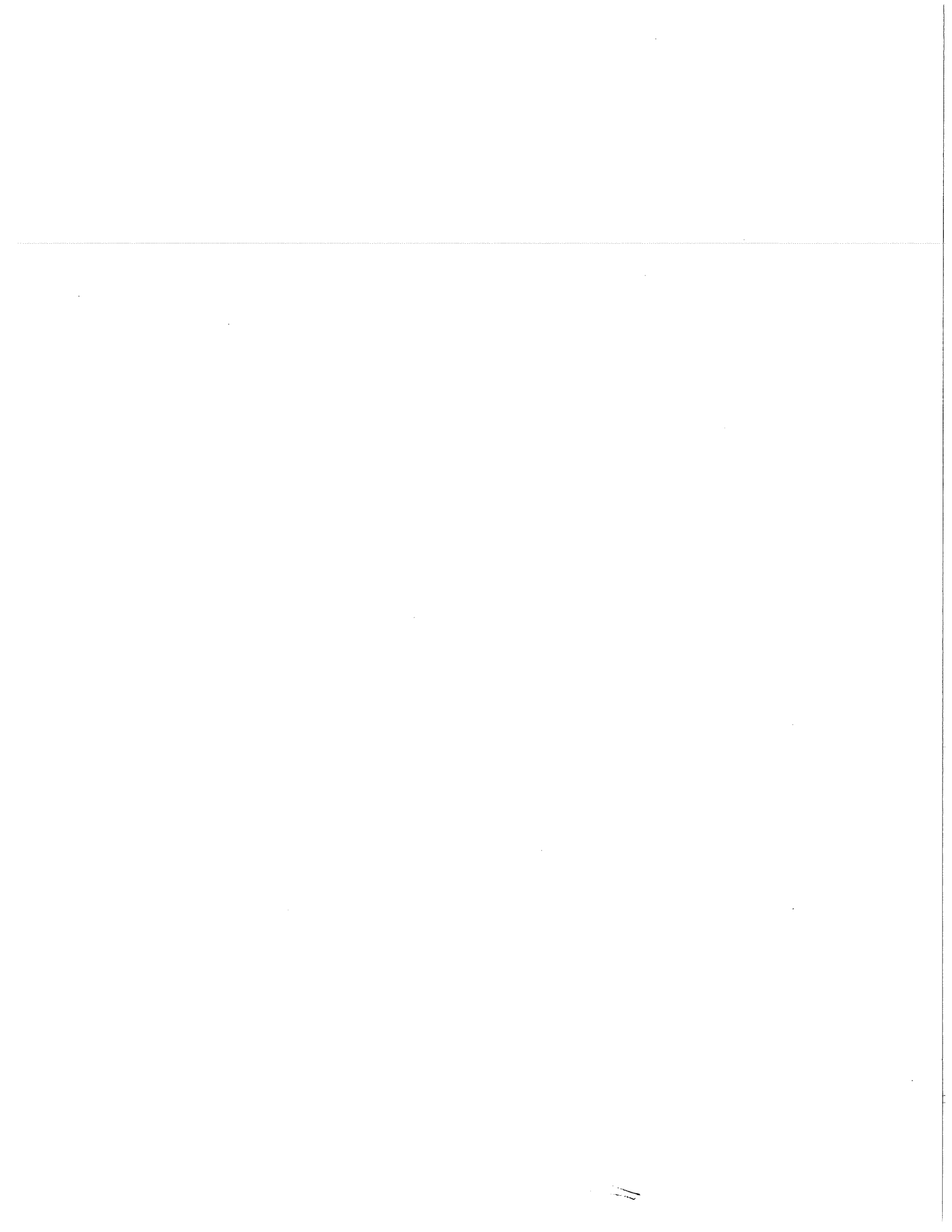


\_\_\_\_\_  
Signature of Authorized Official

6/17/19

\_\_\_\_\_  
Date

\_\_\_\_\_  
\_Mayor  
Title



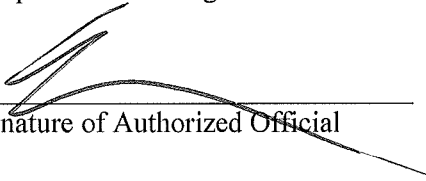
**Housing Opportunities for Persons With AIDS Certifications**

The HOPWA grantee certifies that:

**Activities** -- Activities funded under the program will meet urgent needs that are not being met by available public and private sources.

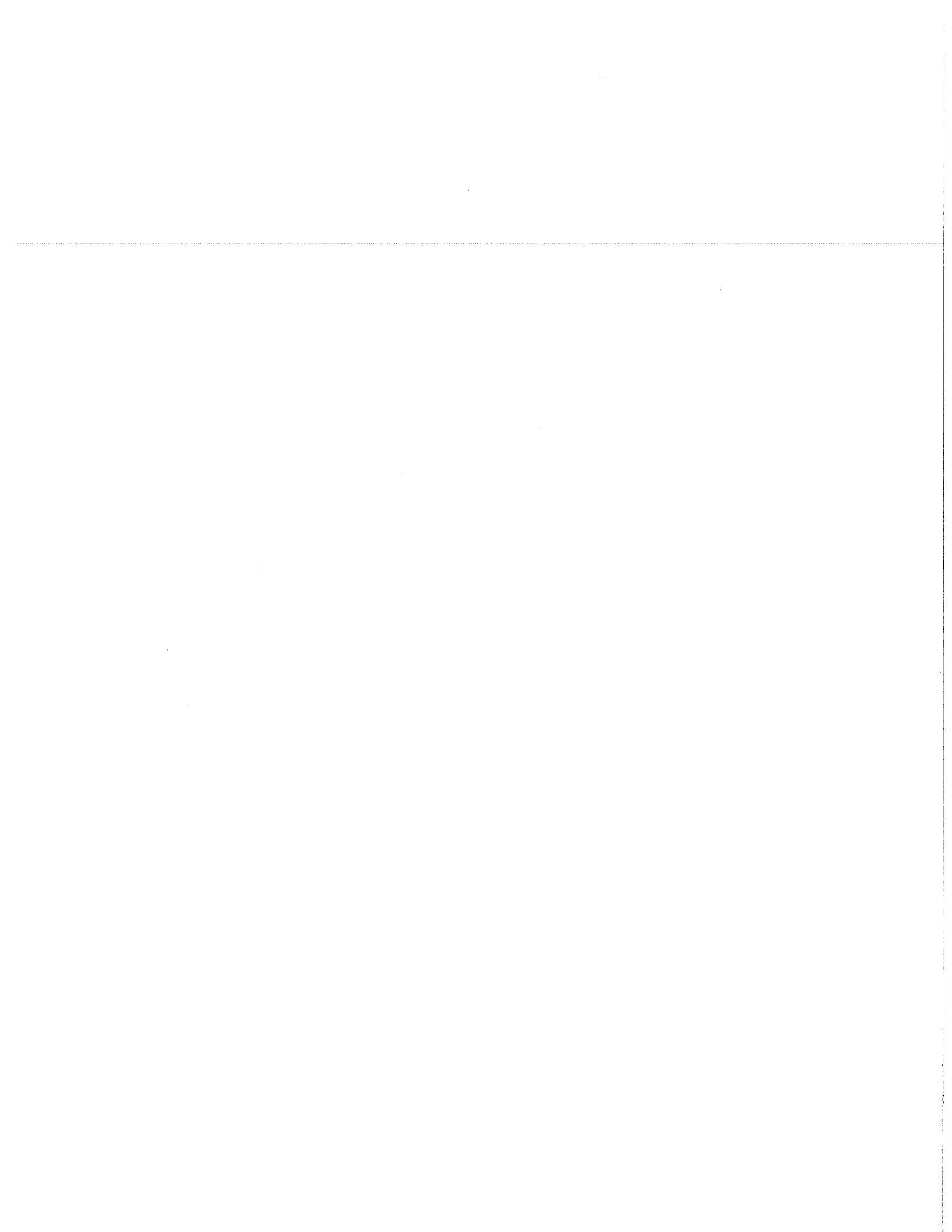
**Building** -- Any building or structure assisted under that program shall be operated for the purpose specified in the consolidated plan:

1. For a period of not less than 10 years in the case of assistance involving new construction, substantial rehabilitation, or acquisition of a facility,
2. For a period of not less than 3 years in the case of assistance involving non-substantial rehabilitation or repair of a building or structure.

  
\_\_\_\_\_  
Signature of Authorized Official

6/17/19  
Date

\_\_\_\_\_  
Mayor  
\_\_\_\_\_  
Title



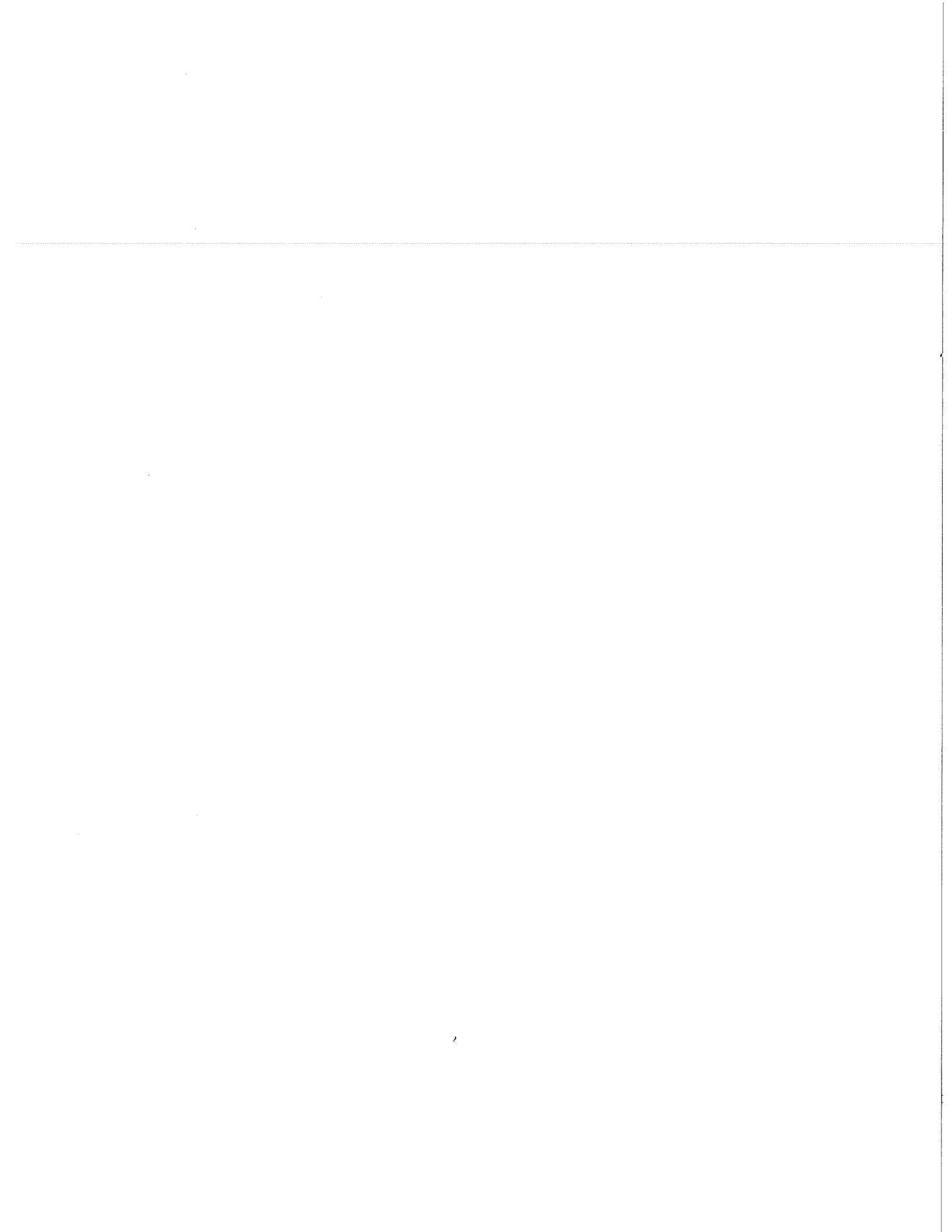
## APPENDIX TO CERTIFICATIONS

### INSTRUCTIONS CONCERNING LOBBYING CERTIFICATION:

#### **Lobbying Certification**

This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

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## **RESIDENTIAL ANTIDISPLACEMENT AND RELOCATION ASSISTANCE PLAN (City of Portland Supplement)**

This Residential Anti-displacement and Relocation Assistance Plan (RARAP) is prepared by The City of Portland in accordance with the Housing and Community Development Act of 1974, as amended; and HUD regulations at 24 CFR 42.325 and is applicable to our CDBG\*, HOPWA UDAG and/or HOME-assisted projects.

**Minimize Displacement** - Consistent with the goals and objectives of activities assisted under the Act, The City of Portland will take the following steps to minimize the direct and indirect displacement of persons from their homes:

- Collect as part of every application for federal funds, a Relocation and Acquisition Questionnaire to assess potential temporary or permanent relocation to use as a determining factor for loan/grant approval.
- Stage rehabilitation of apartment units if possible to allow tenants to remain in the building/complex during and after the rehabilitation, working with empty units first.
- Arrange and/or offer replacement units, both temporary and permanent when possible within the borrower's affordable housing portfolio.
- Work closely with borrowers and their relocation contractors to ensure compliance with URA
- Use tax assessment policies and programs to encourage creation of affordable and low income housing in not only Urban Renewal Areas, but in other areas in the jurisdiction as well.
- Offer information and services to provide homeowners and tenants with materials on assistance available to help them through City of Portland housing programs.
- When reasonable, give priority to rehabilitation of housing, as opposed to demolition, to avoid displacement.

If feasible, demolish or convert only dwelling units that are not occupied or vacant occupiable dwelling units (especially those units which are "lower-income dwelling units" (as defined in 24 CFR 42.305).

Target for rehabilitation only those units deemed essential to the need or success of the project  
1 CDBG programs include: Entitlement Community Development Block Grant (CDBG) Program, State CDBG Program, CDBG Small Cities Program, Section 108 Loan Guarantee Program, CDBG Special Purpose Grants Program, and the Neighborhood Stabilization Program (NSP).

### **Relocation Assistance Payments for Residential Tenants Displaced – Uniform Relocation Act and Section 104(d)**

The City of Portland shall make installments, except that lump sum payments may be made to cover (1) moving expenses, (2) a down-payment on the purchase of replacement housing, or incidental expenses related to (1) or (2). Whenever the payment is made in installments, the full amount of the approved payment shall be disbursed in regular installments, whether or not there is any later change in the person's income or rent, or in the condition or location of the person's housing. These payments will be disbursed in three (3) payments unless it has been determined by the City of Portland that there is a reasonable request to reduce the installments to no less than (2).

### **Relocation Assistance to Displaced Persons – Section 104(d)**

The City of Portland will provide relocation assistance for lower-income tenants who, in connection with an activity assisted under the [CDBG, HOME and/or HOPWA] Program[s], move permanently or move personal property from real property as a direct result of the demolition of any dwelling unit or the conversion of a lower-income dwelling unit in accordance with the requirements of 24 CFR 42.350 (Section 104(d)). A displaced person who is not a lower-income tenant, will be provided relocation assistance in accordance with the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended, and implementing regulations at 49 CFR Part 24.

### **One-for-One Replacement of Lower-Income Dwelling Units**

The City of Portland will replace all occupied and vacant occupiable lower-income dwelling units demolished or converted to a use other than lower-income housing in connection with a project assisted with funds provided under the [CDBG, HOME and/or HOPWA] Program[s] in accordance with 24 CFR 42.375.

Before entering into a contract committing the City of Portland to provide funds for a project that will directly result in demolition or conversion of lower-income dwelling units, the City of Portland will make these plans public by required methods and submit to HUD information in writing:

1. A description of the proposed assisted project;
2. The address, number of bedrooms, and location on a map of lower-income dwelling units that will be demolished or converted to a use other than as lower-income dwelling units as a result of an assisted project;
3. A time schedule for the commencement and completion of the demolition or conversion;
4. To the extent known, the address, number of lower-income dwelling units by size (number of bedrooms) and location on a map of the replacement lower-income housing that has been or will be provided. *NOTE: See also 24 CFR 42.375(d).*



5. The source of funding and a time schedule for the provision of the replacement dwelling units;
6. The basis for concluding that each replacement dwelling unit will remain a lower-income dwelling unit for at least 10 years from the date of initial occupancy; and
7. Information demonstrating that any proposed replacement of lower-income dwelling units with smaller dwelling units (e.g., a 2-bedroom unit with two 1-bedroom units), or any proposed replacement of efficiency or single-room occupancy (SRO) units with units of a different size, is appropriate and consistent with the housing needs and priorities identified in the HUD-approved Consolidated Plan and 24 CFR 42.375(b).

To the extent that the specific location of the replacement dwelling units and other data in items 4 through 7 are not available at the time of the general submission, The City of Portland will identify the general location of such dwelling units on a map and complete the disclosure and submission requirements as soon as the specific data is available.

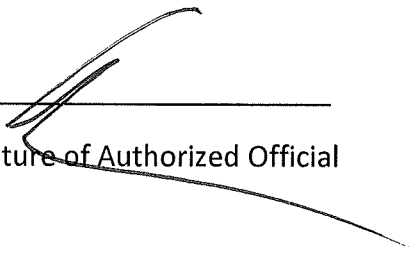
**Replacement not Required Based on Unit Availability**

Under 24 CFR 42.375(d), the City of Portland may submit a request to HUD for a determination that the one-for-one replacement requirement does not apply based on objective data that there is an adequate supply of vacant lower-income dwelling units in standard condition available on a non-discriminatory basis within the area.

**Contacts**

The Portland Housing Bureau is responsible for tracking the replacement of lower income dwelling units and ensuring that they are provided within the required period.

The Portland Housing Bureau is responsible for monitoring the relocation payments and other relocation assistance to any permanently or temporarily displaced person for which federal dollars have been used to fund a project.

  
\_\_\_\_\_  
Signature of Authorized Official

6/17/19  
\_\_\_\_\_  
Date

\_\_\_\_\_  
\_Mayor\_

Title



CDBG

## Application for Federal Assistance SF-424

## \* 1. Type of Submission:

- Preapplication  
 Application  
 Changed/Corrected Application

## \* 2. Type of Application:

- New  
 Continuation  
 Revision

## \* If Revision, select appropriate

\* Other (Specify):

## \* 3. Date Received:

06/11/2019

## 4. Applicant Identifier:

93-6002238

## 5a. Federal Entity Identifier:

## 5b. Federal Award Identifier:

B-19-MC-41-0003

## State Use Only:

## 6. Date Received by State:

## 7. State Application Identifier:

## 8. APPLICANT INFORMATION:

\* a. Legal Name: City of Portland

## \* b. Employer/Taxpayer Identification Number (EIN/TIN):

93-6002236

## \* c. Organizational DUNS:

0549711970000

## d. Address:

## \* Street1:

421 SW 6th Avenue, Suite 500

## Street2:

## \* City:

Portland

## County/Parish:

## \* State:

OR: Oregon

## Province:

## \* Country:

USA: UNITED STATES

## \* Zip / Postal Code:

97204-1620

## e. Organizational Unit:

## Department Name:

Portland Housing Bureau

## Division Name:

## f. Name and contact information of person to be contacted on matters involving this application:

## Prefix:

Ms.

## \* First Name:

Kim

## Middle Name:

## \* Last Name:

McCarty

## Suffix:

Title: Senior Housing Program Coordinator

## Organizational Affiliation:

## \* Telephone Number:

503-823-5312

## Fax Number:

503-823-2387

\* Email: Kim.McCarty@portlandoregon.gov

**Application for Federal Assistance SF-424**

**\* 9. Type of Applicant 1: Select Applicant Type:**

C: City or Township Government

Type of Applicant 2: Select Applicant Type:

B: County Government

Type of Applicant 3: Select Applicant Type:

\* Other (specify):

**\* 10. Name of Federal Agency:**

U.S. Department of Housing and Urban Development

**11. Catalog of Federal Domestic Assistance Number:**

14-218

CFDA Title:

Community Development Block Grant

**\* 12. Funding Opportunity Number:**

NA

\* Title:

NA

**13. Competition Identification Number:**

Title:

**14. Areas Affected by Project (Cities, Counties, States, etc.):**

Add Attachment

Delete Attachment

View Attachment

**\* 15. Descriptive Title of Applicant's Project:**

Consolidated Plan 2016-2020, Action Plans for 2019-2020 for the Portland Consortium. Affected areas include OR: City of Portland, City of Gresham, Multnomah County.

Attach supporting documents as specified in agency instructions.

Add Attachments

Delete Attachments

View Attachments

**Application for Federal Assistance SF-424**

**16. Congressional Districts Of:**

\* a. Applicant

\* b. Program/Project

Attach an additional list of Program/Project Congressional Districts if needed.

**17. Proposed Project:**

\* a. Start Date:

\* b. End Date:

**18. Estimated Funding (\$):**

* a. Federal	<input type="text" value="8,509,881.00"/>
* b. Applicant	<input type="text"/>
* c. State	<input type="text"/>
* d. Local	<input type="text"/>
* e. Other	<input type="text"/>
* f. Program Income	<input type="text"/>
* g. TOTAL	<input type="text" value="8,509,881.00"/>

**\* 19. Is Application Subject to Review By State Under Executive Order 12372 Process?**

- a. This application was made available to the State under the Executive Order 12372 Process for review on
- b. Program is subject to E.O. 12372 but has not been selected by the State for review.
- c. Program is not covered by E.O. 12372.

**\* 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)**

- Yes
- No

If "Yes", provide explanation and attach

**21. \*By signing this application, I certify (1) to the statements contained in the list of certifications\*\* and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances\*\* and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 218, Section 1001)**

\*\* I AGREE

\*\* The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.

**Authorized Representative:**

Prefix:  \* First Name:   
Middle Name:   
\* Last Name:   
Suffix:

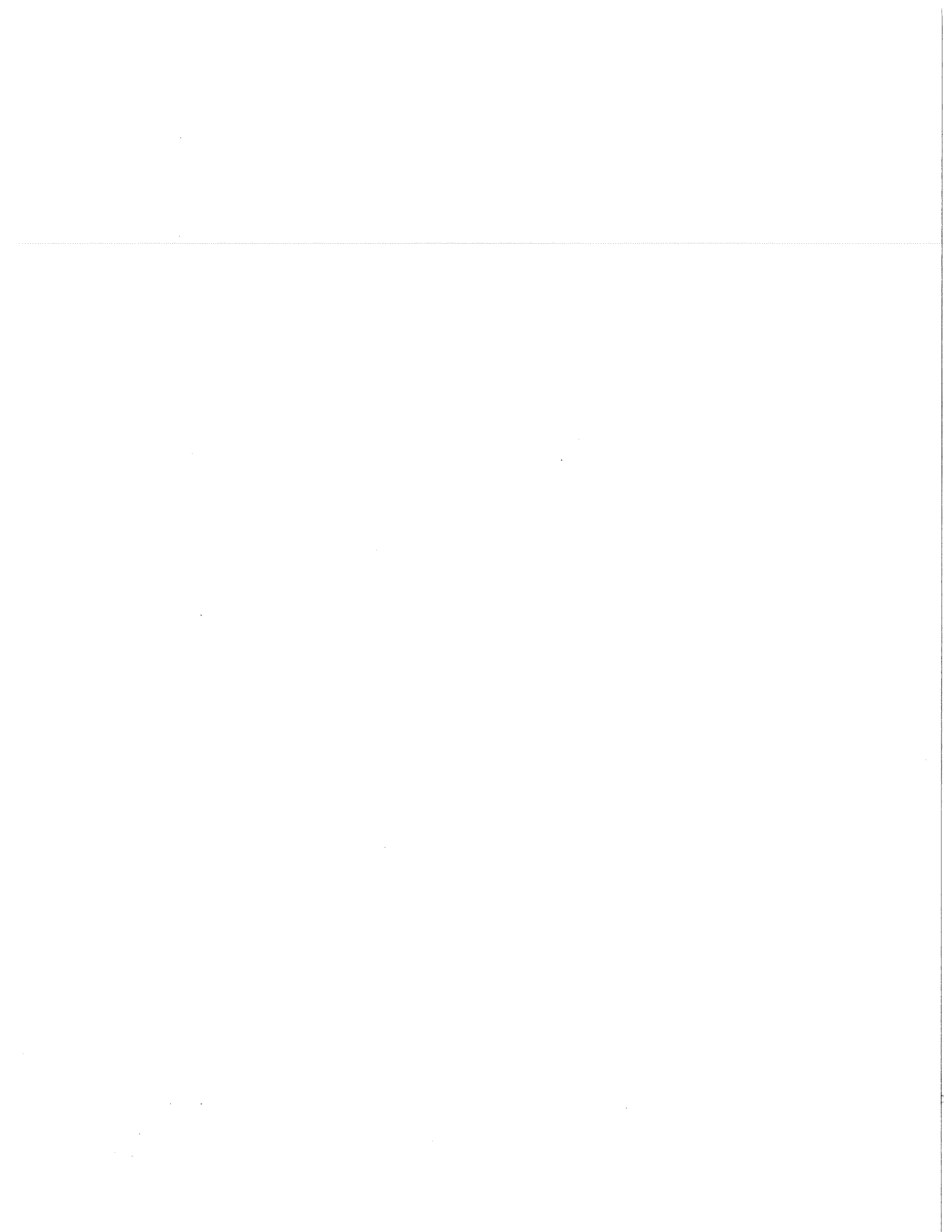
\* Title:

\* Telephone Number:  Fax Number:

\* Email:

\* Signature of Authorized Representative: 

\* Date Signed:



## ASSURANCES - CONSTRUCTION PROGRAMS

OMB Number: 4040-0009  
Expiration Date: 02/28/2022

Public reporting burden for this collection of information is estimated to average 15 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Office of Management and Budget, Paperwork Reduction Project (0348-0042), Washington, DC 20503.

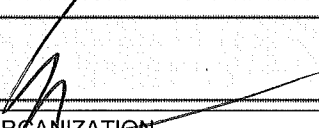
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19. Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.
20. Will comply with the requirements of Section 106(g) of the Trafficking Victims Protection Act (TVPA) of 2000, as amended (22 U.S.C. 7104) which prohibits grant award recipients or a sub-recipient from (1) Engaging in severe forms of trafficking in persons during the period of time that the award is in effect (2) Procuring a commercial sex act during the period of time that the award is in effect or (3) Using forced labor in the performance of the award or subawards under the award.

SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL 	TITLE Mayor
APPLICANT ORGANIZATION City of Portland	DATE SUBMITTED 06/30/2019



### ASSURANCES - NON-CONSTRUCTION PROGRAMS

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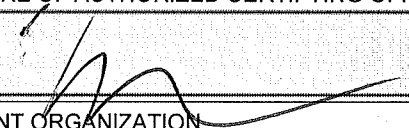
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SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL 	TITLE
APPLICANT ORGANIZATION	DATE SUBMITTED

Application for Federal Assistance SF-424								
<b>* 1. Type of Submission:</b> <input type="checkbox"/> Preapplication <input checked="" type="checkbox"/> Application <input type="checkbox"/> Changed/Corrected Application			<b>* 2. Type of Application:</b> <input checked="" type="checkbox"/> New <input type="checkbox"/> Continuation <input type="checkbox"/> Revision			<b>* If Revision, select appropriate letter(s):</b> <input type="text"/> <b>* Other (Specify):</b> <input type="text"/>		
<b>* 3. Date Received:</b> 06/11/2019			<b>4. Applicant Identifier:</b> 93-6002238					
<b>5a. Federal Entity Identifier:</b> <input type="text"/>			<b>5b. Federal Award Identifier:</b> E-19-MC-41-0003					
<b>State Use Only:</b>								
<b>6. Date Received by State:</b> <input type="text"/>		<b>7. State Application Identifier:</b> <input type="text"/>						
<b>8. APPLICANT INFORMATION:</b>								
<b>* a. Legal Name:</b> City of Portland								
<b>* b. Employer/Taxpayer Identification Number (EIN/TIN):</b> 93-6002236			<b>* c. Organizational DUNS:</b> 0549711970000					
<b>d. Address:</b>								
<b>* Street1:</b> 421 SW 6th Avenue, Suite 500								
<b>Street2:</b> <input type="text"/>								
<b>* City:</b> Portland								
<b>County/Parish:</b> <input type="text"/>								
<b>* State:</b> <input type="text"/> OR: Oregon								
<b>Province:</b> <input type="text"/>								
<b>* Country:</b> <input type="text"/> USA: UNITED STATES								
<b>* Zip / Postal Code:</b> 97204-1620								
<b>e. Organizational Unit:</b>								
<b>Department Name:</b> Portland Housing Bureau			<b>Division Name:</b> <input type="text"/>					
<b>f. Name and contact information of person to be contacted on matters involving this application:</b>								
<b>Prefix:</b> Ms.		<b>* First Name:</b> Kim						
<b>Middle Name:</b> <input type="text"/>								
<b>* Last Name:</b> McCarty								
<b>Suffix:</b> <input type="text"/>								
<b>Title:</b> Senior Housing Program Coordinator								
<b>Organizational Affiliation:</b> <input type="text"/>								
<b>* Telephone Number:</b> 503-823-5312			<b>Fax Number:</b> 503-823-2387					
<b>* Email:</b> Kim.McCarty@portlandoregon.gov								

**Application for Federal Assistance SF-424**

**\* 9. Type of Applicant 1: Select Applicant Type:**

C: City or Township Government

Type of Applicant 2: Select Applicant Type:

B: County Government

Type of Applicant 3: Select Applicant Type:

\* Other (specify):

**\* 10. Name of Federal Agency:**

U.S. Department of Housing and Urban Development

**11. Catalog of Federal Domestic Assistance Number:**

14-231

CFDA Title:

Emergency Solutions Grant

**\* 12. Funding Opportunity Number:**

NA

\* Title:

**13. Competition Identification Number:**

Title:

**14. Areas Affected by Project (Cities, Counties, States, etc.):**

Add Attachment

Delete Attachment

View Attachment

**\* 15. Descriptive Title of Applicant's Project:**

Consolidated Plan 2016-2020, Action Plans for 2018-2019 for the Portland Consortium. Areas affected by project include OR: Clackamas, Washington, Yamhill, Multnomah, Columbia. WA: Clark, Skamania

Attach supporting documents as specified in agency instructions.

Add Attachments

Delete Attachments

View Attachments

**Application for Federal Assistance SF-424**

**16. Congressional Districts Of:**

\* a. Applicant

\* b. Program/Project

Attach an additional list of Program/Project Congressional Districts if needed.

**17. Proposed Project:**

\* a. Start Date:

\* b. End Date:

**18. Estimated Funding (\$):**

* a. Federal	<input type="text" value="728,939.00"/>
* b. Applicant	<input type="text"/>
* c. State	<input type="text"/>
* d. Local	<input type="text" value="728,939.00"/>
* e. Other	<input type="text"/>
* f. Program Income	<input type="text"/>
* g. TOTAL	<input type="text" value="1,457,878.00"/>

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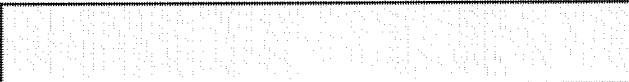
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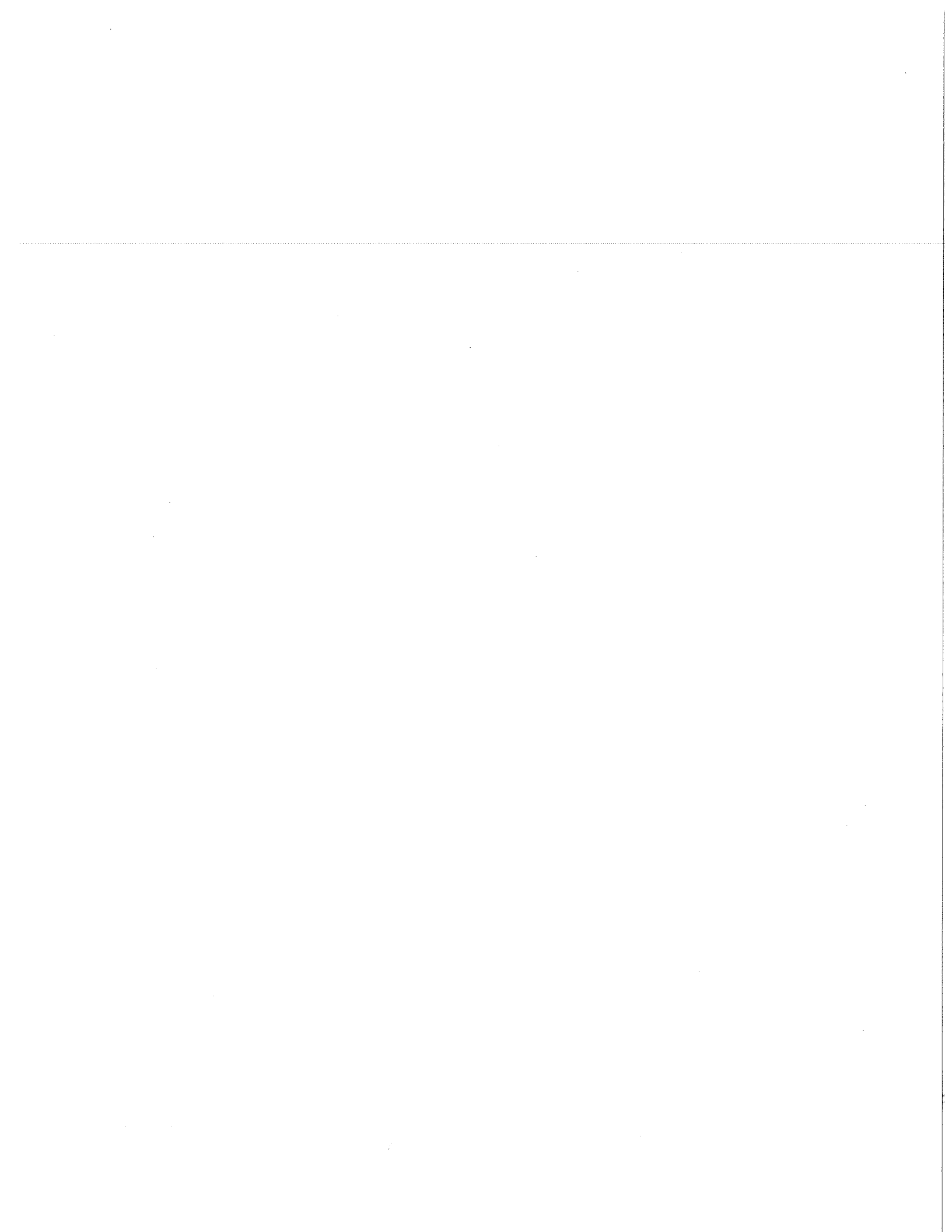
\* Title:

\* Telephone Number:  Fax Number:

\* Email:

\* Signature of Authorized Representative: 

\* Date Signed:



## ASSURANCES - CONSTRUCTION PROGRAMS

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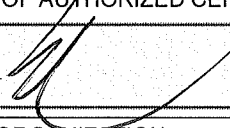
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SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL 	TITLE Mayor
APPLICANT ORGANIZATION City of Portland	DATE SUBMITTED 06/30/2019



### ASSURANCES - NON-CONSTRUCTION PROGRAMS

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2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, through any authorized representative, access to and the right to examine all records, books, papers, or documents related to the award; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
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14. Will comply with P.L. 93-348 regarding the protection of human subjects involved in research, development, and related activities supported by this award of assistance.
15. Will comply with the Laboratory Animal Welfare Act of 1966 (P.L. 89-544, as amended, 7 U.S.C. §§2131 et seq.) pertaining to the care, handling, and treatment of warm blooded animals held for research, teaching, or other activities supported by this award of assistance.
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SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL 	TITLE Mayor
APPLICANT ORGANIZATION City of Portland	DATE SUBMITTED 06/30/2019

Application for Federal Assistance SF-424		
* 1. Type of Submission: <input type="checkbox"/> Preapplication <input checked="" type="checkbox"/> Application <input type="checkbox"/> Changed/Corrected Application	* 2. Type of Application: <input checked="" type="checkbox"/> New <input type="checkbox"/> Continuation <input type="checkbox"/> Revision	* If Revision, select appropriate letter(s): _____ * Other (Specify): _____
* 3. Date Received: 06/11/2019	4. Applicant Identifier: 93-6002238	
5a. Federal Entity Identifier: _____	5b. Federal Award Identifier: M-19-DC-41-0203	
<b>State Use Only:</b>		
6. Date Received by State: _____	7. State Application Identifier: _____	
<b>8. APPLICANT INFORMATION:</b>		
* a. Legal Name: City of Portland		
* b. Employer/Taxpayer Identification Number (EIN/TIN): 93-6002236	* c. Organizational DUNS: 0549711970000	
<b>d. Address:</b>		
* Street1: 421 SW 6th Avenue, Suite 500	Street2: _____	
* City: Portland	County/Parish: _____	
* State: _____	OR: Oregon	
Province: _____	Country: USA: UNITED STATES	
* Zip / Postal Code: 97204-1620		
<b>e. Organizational Unit:</b>		
Department Name: Portland Housing Bureau	Division Name: _____	
<b>f. Name and contact information of person to be contacted on matters involving this application:</b>		
Prefix: Ms.	* First Name: Kim	
Middle Name: _____		
* Last Name: McCarty		
Suffix: _____		
Title: Senior Housing Program Coordinator		
Organizational Affiliation: _____		
* Telephone Number: 503-823-5312	Fax Number: 503-823-2387	
* Email: Kim.McCarty@portlandoregon.gov		

**Application for Federal Assistance SF-424**

**\* 9. Type of Applicant 1: Select Applicant Type:**

C: City or Township Government

Type of Applicant 2: Select Applicant Type:

B: County Government

Type of Applicant 3: Select Applicant Type:

\* Other (specify):

**\* 10. Name of Federal Agency:**

U.S. Department of Housing and Urban Development

**11. Catalog of Federal Domestic Assistance Number:**

14-238

CFDA Title:

HOME Investment Partnership

**\* 12. Funding Opportunity Number:**

NA

\* Title:

**13. Competition Identification Number:**

Title:

**14. Areas Affected by Project (Cities, Counties, States, etc.):**

Add Attachment

Delete Attachment

View Attachment

**\* 15. Descriptive Title of Applicant's Project:**

Consolidated Plan 2016-2020, Action Plans for 2019-2020 for the Portland Consortium. Areas affected by project include OR: Clackamas, Washington, Yamhill, Multnomah, Columbia. WA: Clark, Skamania

Attach supporting documents as specified in agency instructions.

Add Attachments

Delete Attachments

View Attachments

**Application for Federal Assistance SF-424**

**16. Congressional Districts Of:**

\* a. Applicant

\* b. Program/Project

Attach an additional list of Program/Project Congressional Districts if needed.

**17. Proposed Project:**

\* a. Start Date:

\* b. End Date:

**18. Estimated Funding (\$):**

* a. Federal	<input type="text" value="3,665,146.00"/>
* b. Applicant	<input type="text"/>
* c. State	<input type="text"/>
* d. Local	<input type="text" value="912,865.00"/>
* e. Other	<input type="text"/>
* f. Program Income	<input type="text"/>
* g. TOTAL	<input type="text" value="4,578,011.00"/>

**\* 19. Is Application Subject to Review By State Under Executive Order 12372 Process?**

- a. This application was made available to the State under the Executive Order 12372 Process for review on
- b. Program is subject to E.O. 12372 but has not been selected by the State for review.
- c. Program is not covered by E.O. 12372.

**\* 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)**

- Yes  No

If "Yes", provide explanation and attach

**21. \*By signing this application, I certify (1) to the statements contained in the list of certifications\*\* and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances\*\* and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 218, Section 1001)**

\*\* I AGREE

\*\* The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.

**Authorized Representative:**

Prefix:  \* First Name:

Middle Name:

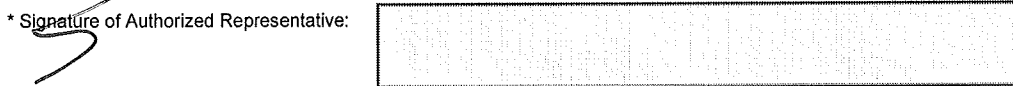
\* Last Name:

Suffix:

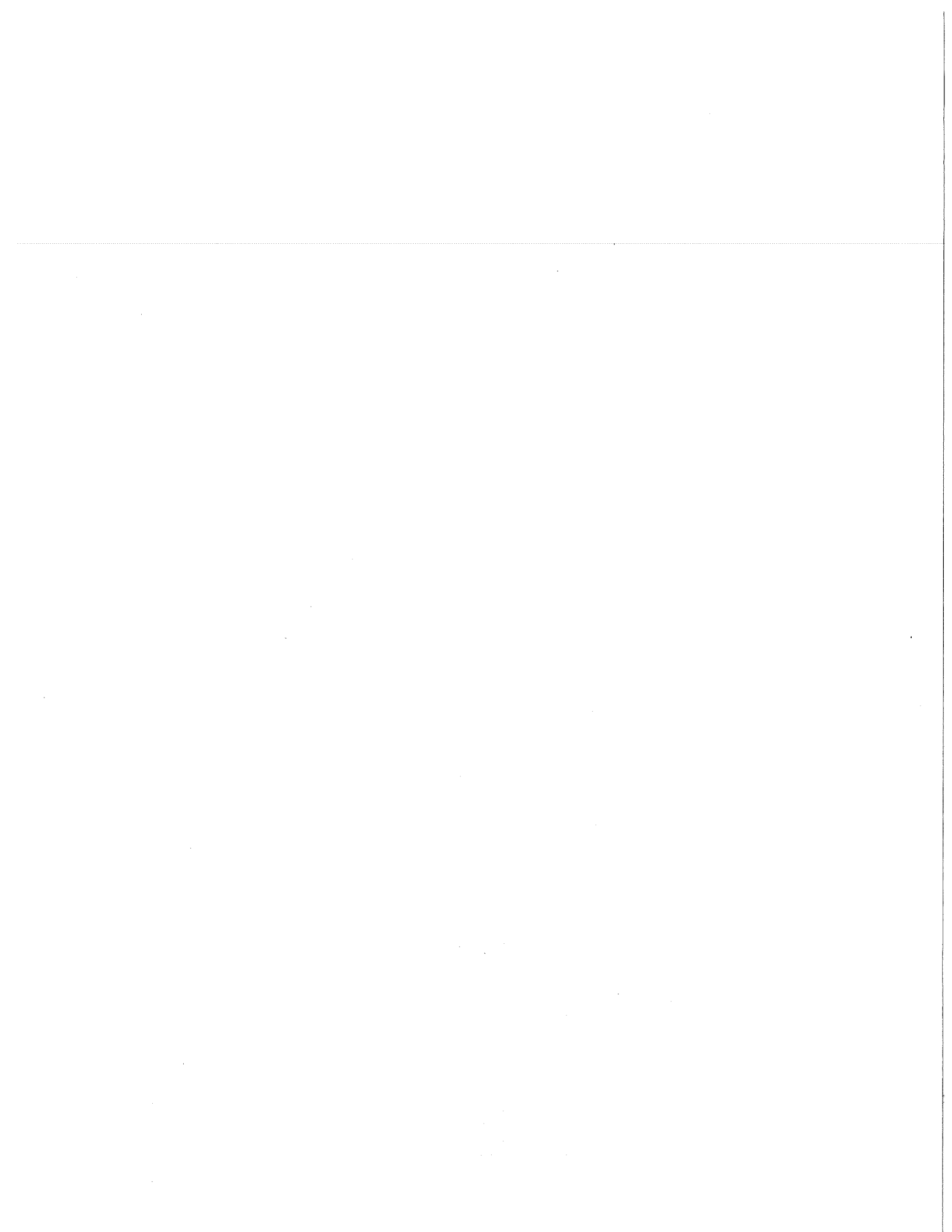
\* Title:

\* Telephone Number:  Fax Number:

\* Email:

\* Signature of Authorized Representative: 

\* Date Signed:



## ASSURANCES - CONSTRUCTION PROGRAMS

OMB Number: 4040-0009  
Expiration Date: 02/28/2022

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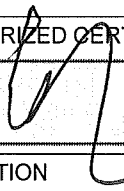
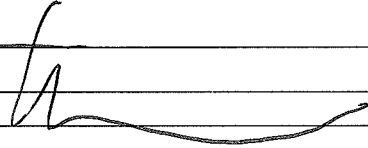
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3. Will not dispose of, modify the use of, or change the terms of the real property title or other interest in the site and facilities without permission and instructions from the awarding agency. Will record the Federal awarding agency directives and will include a covenant in the title of real property acquired in whole or in part with Federal assistance funds to assure non-discrimination during the useful life of the project.
4. Will comply with the requirements of the assistance awarding agency with regard to the drafting, review and approval of construction plans and specifications.
5. Will provide and maintain competent and adequate engineering supervision at the construction site to ensure that the complete work conforms with the approved plans and specifications and will furnish progressive reports and such other information as may be required by the assistance awarding agency or State.
6. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
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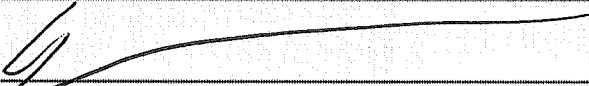
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SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL 	TITLE Mayor
APPLICANT ORGANIZATION City of Portland	DATE SUBMITTED 06/30/2019

HOPWA

**Application for Federal Assistance SF-424**

* 1. Type of Submission:		* 2. Type of Application:	* If Revision, select appropriate letter(s):
<input type="checkbox"/> Preapplication	<input checked="" type="checkbox"/> Application	<input checked="" type="checkbox"/> New	
<input type="checkbox"/> Changed/Corrected Application		<input type="checkbox"/> Continuation	* Other (Specify):
		<input type="checkbox"/> Revision	

* 3. Date Received:	4. Applicant Identifier:
06/11/2019	93-6002238

5a. Federal Entity Identifier:	5b. Federal Award Identifier:
	ORH19F-001

**State Use Only:**

6. Date Received by State:	7. State Application Identifier:

**8. APPLICANT INFORMATION:**

* a. Legal Name:	City of Portland
------------------	------------------

* b. Employer/Taxpayer Identification Number (EIN/TIN):	* c. Organizational DUNS:
93-6002236	0549711970000

**d. Address:**

* Street1:	421 SW 6th Avenue, Suite 500
Street2:	
* City:	Portland
County/Parish:	
* State:	OR: Oregon
Province:	
* Country:	USA: UNITED STATES
* Zip / Postal Code:	97204-1620

**e. Organizational Unit:**

Department Name:	Division Name:
Portland Housing Bureau	

**f. Name and contact information of person to be contacted on matters involving this application:**

Prefix:	Ms.	* First Name:	Kim
Middle Name:			
* Last Name:	McCarty		
Suffix:			

Title:	Senior Housing Program Coordinator
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Organizational Affiliation:	
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* Telephone Number:	503-823-5312	Fax Number:	503-823-2387
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* Email:	Kim.McCarty@portlandoregon.gov
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**Application for Federal Assistance SF-424**

**\* 9. Type of Applicant 1: Select Applicant Type:**

C: City or Township Government

Type of Applicant 2: Select Applicant Type:

B: County Government

Type of Applicant 3: Select Applicant Type:

\* Other (specify):

**\* 10. Name of Federal Agency:**

U.S. Department of Housing and Urban Development

**11. Catalog of Federal Domestic Assistance Number:**

14-241

CFDA Title:

Housing for Persons with AIDS (HOPWA)

**\* 12. Funding Opportunity Number:**

NA

\* Title:

**13. Competition Identification Number:**

Title:

**14. Areas Affected by Project (Cities, Counties, States, etc.):**

Add Attachment

Delete Attachment

View Attachment

**\* 15. Descriptive Title of Applicant's Project:**

Consolidated Plan 2016-2020, Action Plans for 2018-2019 for the Portland Consortium. Affected areas include OR: Clackamas, Washington, Yamhill, Multnomah, Columbia. WA: Clark, Skamania

Attach supporting documents as specified in agency instructions.

Add Attachments

Delete Attachments

View Attachments

**Application for Federal Assistance SF-424**

**16. Congressional Districts Of:**

\* a. Applicant

\* b. Program/Project

Attach an additional list of Program/Project Congressional Districts if needed.

Add Attachment

Delete Attachment

View Attachment

**17. Proposed Project:**

\* a. Start Date:

\* b. End Date:

**18. Estimated Funding (\$):**

* a. Federal	<input type="text" value="1,592,044.00"/>
* b. Applicant	<input type="text"/>
* c. State	<input type="text"/>
* d. Local	<input type="text"/>
* e. Other	<input type="text"/>
* f. Program Income	<input type="text"/>
* g. TOTAL	<input type="text" value="1,592,044.00"/>

**\* 19. Is Application Subject to Review By State Under Executive Order 12372 Process?**

- a. This application was made available to the State under the Executive Order 12372 Process for review on .
- b. Program is subject to E.O. 12372 but has not been selected by the State for review.
- c. Program is not covered by E.O. 12372.

**\* 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)**

- Yes
- No

If "Yes", provide explanation and attach

Add Attachment

Delete Attachment

View Attachment

21. \*By signing this application, I certify (1) to the statements contained in the list of certifications\*\* and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances\*\* and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 218, Section 1001)

\*\* I AGREE

\*\* The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.

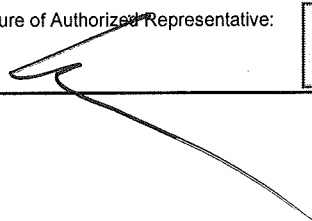
**Authorized Representative:**

Prefix:  \* First Name:   
Middle Name:   
\* Last Name:   
Suffix:

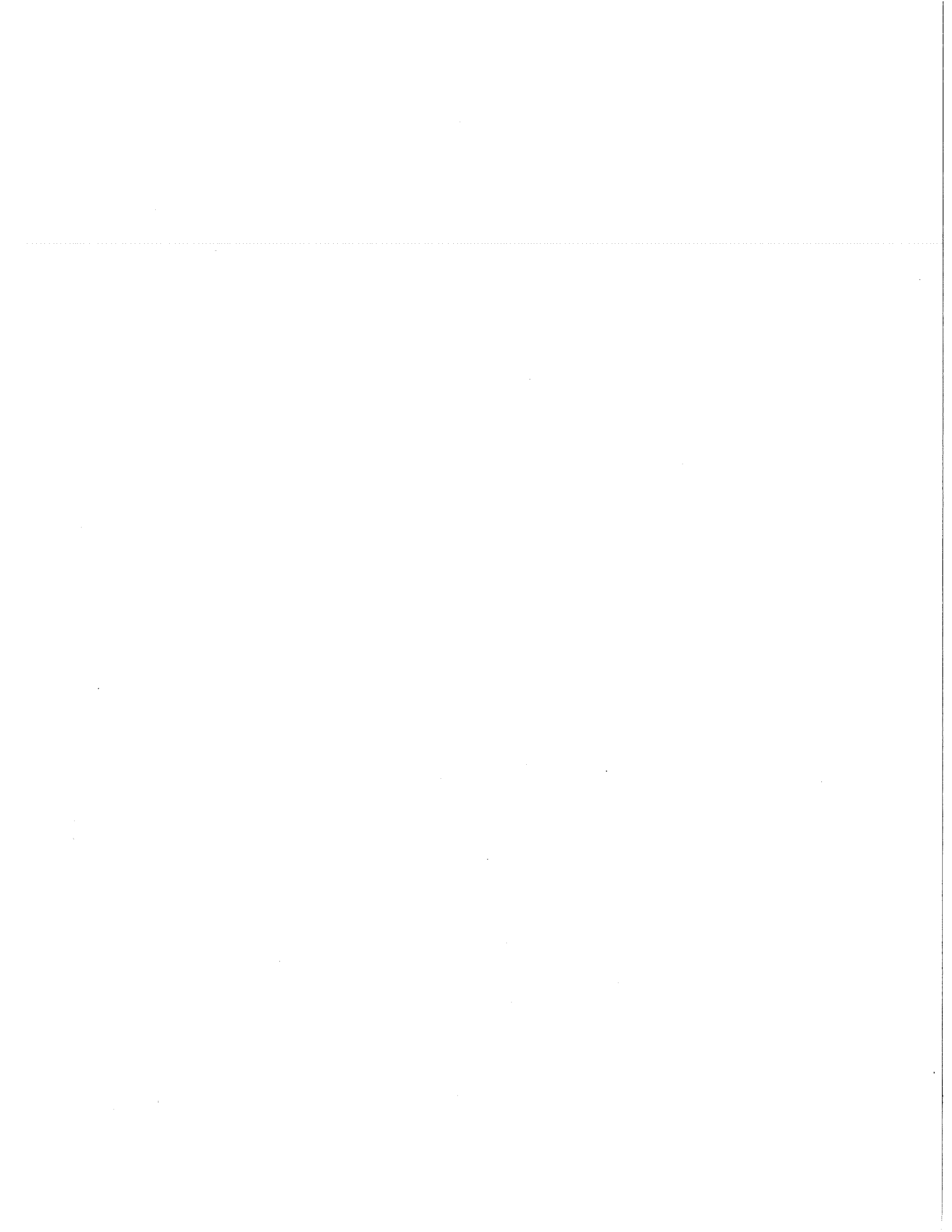
\* Title:

\* Telephone Number:  Fax Number:

\* Email:

\* Signature of Authorized Representative: 

\* Date Signed:



## ASSURANCES - CONSTRUCTION PROGRAMS

OMB Number: 4040-0009  
Expiration Date: 02/28/2022

Public reporting burden for this collection of information is estimated to average 15 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Office of Management and Budget, Paperwork Reduction Project (0348-0042), Washington, DC 20503.

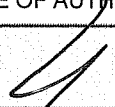
**PLEASE DO NOT RETURN YOUR COMPLETED FORM TO THE OFFICE OF MANAGEMENT AND BUDGET. SEND IT TO THE ADDRESS PROVIDED BY THE SPONSORING AGENCY.**

**NOTE:** Certain of these assurances may not be applicable to your project or program. If you have questions, please contact the Awarding Agency. Further, certain Federal assistance awarding agencies may require applicants to certify to additional assurances. If such is the case, you will be notified.

As the duly authorized representative of the applicant, I certify that the applicant:

1. Has the legal authority to apply for Federal assistance, and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project costs) to ensure proper planning, management and completion of project described in this application.
2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, the right to examine all records, books, papers, or documents related to the assistance; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
3. Will not dispose of, modify the use of, or change the terms of the real property title or other interest in the site and facilities without permission and instructions from the awarding agency. Will record the Federal awarding agency directives and will include a covenant in the title of real property acquired in whole or in part with Federal assistance funds to assure non-discrimination during the useful life of the project.
4. Will comply with the requirements of the assistance awarding agency with regard to the drafting, review and approval of construction plans and specifications.
5. Will provide and maintain competent and adequate engineering supervision at the construction site to ensure that the complete work conforms with the approved plans and specifications and will furnish progressive reports and such other information as may be required by the assistance awarding agency or State.
6. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
7. Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.
8. Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§4728-4763) relating to prescribed standards of merit systems for programs funded under one of the 19 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 900, Subpart F).
9. Will comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. §§4801 et seq.) which prohibits the use of lead-based paint in construction or rehabilitation of residence structures.
10. Will comply with all Federal statutes relating to non-discrimination. These include but are not limited to: (a) Title VI of the Civil Rights Act of 1964 (P.L. 88-352) which prohibits discrimination on the basis of race, color or national origin; (b) Title IX of the Education Amendments of 1972, as amended (20 U.S.C. §§1681 1683, and 1685-1686), which prohibits discrimination on the basis of sex; (c) Section 504 of the Rehabilitation Act of 1973, as amended (29 U.S.C. §794), which prohibits discrimination on the basis of handicaps; (d) the Age Discrimination Act of 1975, as amended (42 U.S.C. §§6101-6107), which prohibits discrimination on the basis of age; (e) the Drug Abuse Office and Treatment Act of 1972 (P.L. 92-255), as amended relating to nondiscrimination on the basis of drug abuse; (f) the Comprehensive Alcohol Abuse and Alcoholism Prevention, Treatment and Rehabilitation Act of 1970 (P.L. 91-616), as amended, relating to nondiscrimination on the basis of alcohol abuse or alcoholism; (g) §§523 and 527 of the Public Health Service Act of 1912 (42 U.S.C. §§290 dd-3 and 290 ee 3), as amended, relating to confidentiality of alcohol and drug abuse patient records; (h) Title VIII of the Civil Rights Act of 1968 (42 U.S.C. §§3601 et seq.), as amended, relating to nondiscrimination in the sale, rental or financing of housing; (i) any other nondiscrimination provisions in the specific statute(s) under which application for Federal assistance is being made; and (j) the requirements of any other nondiscrimination statute(s) which may apply to the application.

11. Will comply, or has already complied, with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-646) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal and federally-assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.
12. Will comply with the provisions of the Hatch Act (5 U.S.C. §§1501-1508 and 7324-7328) which limit the political activities of employees whose principal employment activities are funded in whole or in part with Federal funds.
13. Will comply, as applicable, with the provisions of the Davis-Bacon Act (40 U.S.C. §§276a to 276a-7), the Copeland Act (40 U.S.C. §276c and 18 U.S.C. §874), and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§327-333) regarding labor standards for federally-assisted construction subagreements.
14. Will comply with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is \$10,000 or more.
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SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL 	TITLE Mayor
APPLICANT ORGANIZATION City of Portland	DATE SUBMITTED 06/30/2019



## ASSURANCES - NON-CONSTRUCTION PROGRAMS

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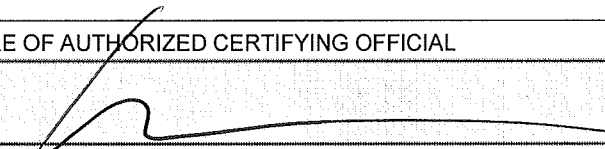
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2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, through any authorized representative, access to and the right to examine all records, books, papers, or documents related to the award; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
3. Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.
4. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
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