

March 2, 2021

Members of the Oregon House Committee on Housing
Salem, Oregon

Dear Members:

Thank you for this opportunity to comment on amendments proposed for House Bill 2100. Please see both United Community Action Network's comments and concerns about the proposed amendments below.

One of the amendment's core purposes is to have more input about homeless service delivery from local communities and those that are directly impacted by provision of these services. Our agency fully support this purpose. Community action agencies ensure that 1/3 of our Board members are low-income community representatives. We benefit greatly from having the presence of those eligible for our services participating in governing our agencies.

Another core purpose of the amendments is to provide the opportunity for additional agencies, including culturally specific non-profits and others to apply directly for homeless service funds. Again, our agency fully backs the idea that non-profits most closely allied with populations in need should be supported in offering homeless services to those populations. Community action agencies like UCAN already work closely with several of these agencies.

Our concerns with this purpose rest on the practical application of the proposed changes. Under the proposal, rather than having local community action agencies like UCAN's work with partner agencies to increase provision of homeless services, OHCS instead would take 20% of funds currently earmarked for community action agencies and offer these funds to any agency through a generalized, statewide RFP process.

While this approach might, on its face, appear to ensure that more agencies would provide homeless services in local communities in Douglas and Josephine County, with the same level of funds going to various regions in the state, we believe that this will not be the case. From our experience, most partner homeless service agencies are relatively small, and many do not desire to incorporate the infrastructure needed to meet comprehensive OHCS requirements on their own. As one example, most do not want to employ the fiscal staff needed to appropriately monitor fund expenditures. We already work to provide the support needed to bolster partners' infrastructure.

We are very concerned about the creation of a separate RFP process. The process will delay the distribution of funds. Homelessness is an urgent crisis, and any delay could result in irreparable harm to those lacking shelter. Nor do we think OHCS will add many agencies through the RFP process, as most of those who might want to provide services cannot or do not want to build their infrastructure so they can meet minimum service requirements.

If OHCS moves forward and funds agencies with inadequate infrastructure to operate in accordance with legal and policy requirements, OHCS monitors are likely to end up bogged down with additional monitoring problems. Moreover, operating a new RFP process will take additional time from OHCS staff. We believe it would far better use of OHCS' staff time to simply focus on strengthening the existing partnership with community action agencies.

A third core objective of the proposed amendments is to ensure that homeless service agencies meet performance outcomes. We welcome an approach that is outcome based. However, UCAN's current contracts with OHCS do not specify expected performance outcomes. If OHCS amends their Master Grant Agreement to include specified outcomes, they can also add requirements for UCAN and other community action agencies to address issues of equity in the delivery of services.

While we believe in the goals OHCS is trying to address, we think their proposed approach will not achieve those goals. Rather, we believe that the most effective way to achieve OHCS' core goals is by having OHCS provide technical assistance so that we can best make our programs more inclusive, best work with partner agencies, and best meet any established performance outcomes.

Know that UCAN is ready to do whatever is necessary to support OHCS' efforts to address the state's homeless crisis, particularly in ensuring that services meet the needs of those who have been historically marginalized in Oregon.

Sincerely,

A handwritten signature in cursive script that reads "Shaun Pritchard".

Shaun Pritchard
Executive Director