



March 18, 2020

Joint Special Committee on Coronavirus Response
900 Court St.
Salem, OR 97301

Dear Chairs Roblan and Holvey and Committee Members:

Caritas Housing, the housing arm of Catholic Charities of Oregon, began working in 1998 to acquire, develop, rehabilitate, and manage permanent affordable housing across the state for those in need of a home. We now have over 800 units in our portfolio, providing homes for nearly 2000 people across the state of Oregon. Like many of our colleagues, we are acting quickly to respond to the COVID-19 pandemic, with a focus on responding to the needs of our most vulnerable community members. But we can't do it alone – we thank you for your quick action and hope you will consider some of the requests we've outlined below.

Across our entire portfolio, we have already implemented a moratorium on late fees and evictions for residents impacted by COVID-19, as have many of our colleagues. We continue to work on additional measure to help keep our residents from losing their housing as a result of this public health emergency. Affordable housing residents and participants may lose income as a result of required quarantine due to illness, inability to report to work due to a child home from school, business closures or reduction in working hours without paid sick leave.

Along with our colleagues at Housing Oregon, we call upon local, state and federal programs:

- To allocate emergency funding to cover lost rental income to ensure an eviction moratorium for non-payment of rent and/or utilities for tenants does not impact agencies' ability to provide other support services on site and continue current efforts at housing stabilization and eviction prevention. Priority should be for regulated affordable housing projects which are the least financially resilient multi-family projects in Oregon due to capped rents, higher staffing and services costs, and housing Oregon's most vulnerable citizens.
- Provide regulatory relief allowing for changes in property management and operations to support social distancing efforts including suspending compliance requirements for
 - Annual income rectifications,
 - Compliance-related unit inspections,
 - In-unit maintenance compliance responses – maintain life and safety maintenance,
 - Allowing residents to refuse entry without being notified of a lease violation.

- Provide financial waivers so properties/owners can accommodate lack of income if not collecting rent payments:
 - Suspend all cash flow split requirements,
 - Evaluate and suspend or amend financial compliance and thresholds regarding operating reserves and other property performance indicators,
 - Suspend monthly/annual allocations to operating and capital reserves.
- Advocate with private financial investors and institutions, the IRS and HUD:
 - Call upon the IRS to amend/suspend/change Section 42 compliance components related to financial issues of tax credit properties, as well as the requirement for annual income verifications,
 - Call upon HUD for the same,
 - Call upon the financial industry, banks, and lenders to consider items listed above,
 - Organizing calls or video meetings with our congressional delegation.

Again, we appreciate your quick response to the many pressing issues that we all face at this uncertain time.

Respectfully,



Travis Phillips

Director of Community Development and Housing