



**OREGON HOUSING** *and*  
**COMMUNITY SERVICES**

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June 14<sup>th</sup>, 2021

RE: Impact of the End of the Eviction Moratorium & Support for Additional Tenant Protections

Dear Chair Smith Warner, Vice-Chairs Drazan and Holvey, and Members of the House Rules Committee:

July is around the corner, and we are deeply concerned with what the end of the eviction moratorium may bring. While historic rental assistance is flowing through our communities, the scale of need is unprecedented and community-based organizations face sizeable capacity challenges in keeping up with the surge of applications for relief. There is a fundamental mismatch between the arbitrary date of July 1<sup>st</sup> and the ability to effectively promote rental assistance programs and process applications. Renters and local organizations need time.

In the last year, OHCS and our local partners have provided more than \$186.3 million in assistance to support more than 43,230 renter households<sup>1</sup>. That is an exponential growth from the ~\$17 million in emergency rental assistance delivered in any year prior to COVID, and providers have surged capacity to meet these needs in the last fourteen months. And, at the same time, there an additional \$423 million must be distributed to those in need<sup>2</sup>. Again, renters and local organizations need more time. [We urge your support of SB 278 and the -2 amendments to provide much needed relief.](#)

### **Oregon's Statewide Application Portal Depicts Extraordinary Need**

For the first time in state history, Oregon has an online application portal for emergency rental assistance. This addresses concerns we heard from community that it was confusing to even know how to apply for assistance in 2020. It also allows OHCS to understand the statewide demand in real-time, and that demand is truly enlightening in the most devastating sense. The [Oregon Emergency Rental Assistance Program \(OERAP\)](#) opened on May 19<sup>th</sup>. Outreach efforts continue to scale up, and 10,115 Oregonians have applied for assistance as of Sunday evening ([see dashboard with application data as of June 7<sup>th</sup>](#)). An additional 6,584 households have initiated an application<sup>3</sup>.

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<sup>1</sup> From April 2020 to June 7<sup>th</sup> through three rental assistance programs: COVID Rental Relief Program, Supporting Tenants Accessing Rental Relief (STARR) program, and the Landlord Compensation Fund program.

<sup>2</sup> Includes remaining ~\$60 million in Landlord Compensation Fund, \$8 million in STARR funds, ~\$200 million in wave one Oregon Emergency Rental Assistance Program (OERAP) and ~\$155 million in wave two OERAP (not yet distributed by U.S. Treasury). *These figures exclude local government funded programs.*

<sup>3</sup> This figure indicates a 61% application completion rate. While much higher than national averages (30-40%), incomplete applications require additional outreach and support from community-based organizations.



In total, 16,679 households have started or completed a rental assistance application. The immediate request for assistance is ~250% greater than those served with the Supporting Tenants Accessing Rental Relief (STARR) program across a total of five months<sup>4</sup>. Prior to July 1, the local program administrators processing OERAP applications will not have sufficient capacity to serve everyone that has already applied by June 14<sup>th</sup>, and we expect that even more people will continue to apply. Federal regulations include strict requirements that make processing applications staff and process intensive, and our statewide software system – while functional – continues to require direct staffing and support to help tenants, landlords, and our community-based partners use it effectively. Additionally, while OHCS and our partners are continuing to get the word out about this program, we know many more Oregonians are in need and have various needs that must be addressed.

### **Oregon Emergency Rental Assistance Program Timing**

OHCS and our partners are careful stewards of public funds, and the OERAP is no exception as U.S. Treasury can request reimbursements if the use of funds do not match the letter of the guidance. While the Oregon Emergency Rental Assistance Program (OERAP) was established by Congress in December 2020, multiple waves of Frequently Asked Questions (FAQs) have been released with the most recent iteration released less than two weeks before OHCS opened the OERAP application. It is important to note that the FAQs are not proper guidance, per se, as the questions and answers impose a tremendous amount of interpretation on individual states. In many ways, this has slowed down the planning process as states seek additional insight and clarification from the Federal government.

The first FAQ was released by the U.S. Treasury in mid-January 2021, and made the program inoperable, requiring too many documents from applicants, which would reduce successful applications. OHCS worked with the National Council of State Housing Finance Agencies and federal advocates to lobby the Biden Administration for more flexibility that would allow funds to be delivered to Americans more quickly. In late March, new answers came that reversed much of the previous administrations restrictive program guidance. This required OHCS to reconsider certain program requirements, revise portal system features, and ultimately delayed program opening. Additionally, OHCS staff time has been divided between OERAP and the Landlord Compensation Fund, two of the largest programs in agency history. Operating the Landlord Compensation Fund with a June 30<sup>th</sup> deadline, due to General Fund timelines, was a priority for OHCS in early 2021.

Thankfully, the Oregon Legislature also allocated tenant-based rental assistance during the December 2020 Special Session. The Supporting Tenants Accessing Rental Relief (STARR) program was established with a \$50 million General Fund investment and has acted as a stop gap for rent assistance between Coronavirus Relief Fund rental assistance and OERAP programs. While our partner Community Action Agencies worked overtime to provide rental

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<sup>4</sup> The STARR program has serve 6,570 households as of June 7<sup>th</sup>, though household served data is not real-time and includes reporting lags.

assistance through these other programs, OHCS worked with the Oregon Housing Stability Council to establish OERAP and navigate changing federal guidance. STARR resources are still available in some communities and, given the 6/30 deadline for General Fund programs, local organizations are focusing on those funds first to ensure assistance is fully utilized.

### **Uncharted Waters: Unprecedented Resources and Expediting the Distribution of Rental Assistance**

Oregon has never had this many emergency rental assistance programs, and we've never seen need this high. Even before the pandemic, 27% of renters were severely housing cost burdened, meaning they spend more than half their income on rent alone. The economic fall-out of the pandemic has caused many more community members to need support, as evident by the demand for OERAP. Thankfully, state and federal policy makers have allocated historic emergency rental assistance resources that have dwarfed any other emergency rental assistance program in history.

In 2020, OHCS and our partners worked to expedite and scale up operations. Despite minimal administrative resources, community organizations staffed up and delivered 10x the amount of emergency rental assistance that they do in a typical year. The changes that our partners made to expedite rental assistance delivery in 2020 demonstrated their expertise in this work and their adaptability and responsiveness to meet unprecedented need through significantly scaled-up resources. Many organizations have revolutionized the manner that assistance is provided to scale up operations. The surge capacity is here, and this year brings the need to continue this exponential growth.

The OERAP comes with better financial support to build out the capacity of local organizations in 2021 than programs did in 2020. Many local partners began increasing staffing in December 2020 and are continuing to hire and onboard new case managers, but these processes take time. Similarly, while local providers have also built a network of hundreds of community partner organizations that can provide support for renters as they apply to OERAP, the coordination and collaboration between these networks requires adequate planning and execution. To underscore the scale of this work, one local administrator shared that prior to COVID, they supported ~800 households with emergency rental assistance each year. Once they are fully staffed, they anticipate helping 800 families in one month. That provider has almost 1,700 applicants in the system as of Sunday, June 13<sup>th</sup>.

To support our network in administering these funds, we're providing additional training and troubleshooting to partners. On Friday, OHCS held trainings all day with local OERAP administrators and software developers to provide in depth training and troubleshooting for minor system glitches. In real-time, we saw actual Oregonians' rental assistance applications move through processing and be sent to payment. To continue expediting rental assistance delivery, OHCS is continuing to think outside the box including holding early discussions about redirecting twenty portal chat/customer service staff to conduct initial application processing, and other unique ways to utilize staff capacity of other state agencies. Additionally, we've



provided maximum flexibility in program policy and guidance to local providers to implement practices that will expedite application processing and payments.

OHCS remains deeply concerned with the potential wave of homelessness that will accompany the end of the eviction moratorium. These evictions come with steep costs, the greatest of which is the trauma families experience from housing instability and homelessness, particularly as Oregon's shelter system is insufficient to shelter half of the people currently experiencing homelessness. This will impact the ability of students to thrive in school, the health of seniors, the overall economic and employment recovery from COVID-19, and the overall well-being of our communities. The public costs of homelessness are also not lost on us. If the coming wave were to materialize, the homelessness crisis we are currently facing will become that much more difficult to address, let alone solve. Your swift action could provide relief to tens of thousands of Oregonians currently facing housing instability.

OHCS and our local community partners are working tirelessly to avoid this potential wave. However, matching operations with the scale of need will and has taken time. No one has seen this scale of need and resources before. We are hearing loud and clear from service providers, and they have confirmed our shared concerns: the July 1<sup>st</sup> deadline and the crushing level of need are a fundamental mismatch to the ability of our systems to scale rapidly to that need. Oregonians need more time to successfully submit applications without immediate risk of eviction and local administrators need time to process these unprecedented number of applications from families and individuals in need of rapid assistance. More time will make all of the difference in our collective response and to the Oregonians we are proud to serve. **We urge you to pass SB 278 and the -2 amendment to give community organizations time to deliver rental assistance.**

Thank you for your leadership,  
Margaret Salazar  
Executive Director, Oregon Housing and Community Services