



March 8, 2021

Chair Julie Fahey
House Committee on Housing
900 Court Street NE
Salem, OR 97301

RE: Response to written testimony of Director Salazar, date March 3, 2021

Dear Chair Fahey, Vice-Chair Morgan, Vice-Chair Campos, and Members of the Committee:
Thank you for the opportunity to present testimony to the committee last week regarding concerns regarding the operational impacts of HB2100. The Community Action Partnership of Oregon looks forward to continued conversation about how to optimize both efficiency and equity in service delivery for Oregonians. In this letter, we are responding to the testimony posted by Director Salazar on March 3. We have a different perspective.

- While the network appreciates the outreach to community action directors individually, those conversations came well off the first (and in some cases second) drafts had been created. There was no conversation with the entire network. We did not see the final bill until 4:45 the night before the first hearing. And as of early December, we were told specifically that there would not be a bill, only learning on December 28 that those assurances had been given in error.
- In regard to the number of culturally specific organizations that receive funding, there is no specific number on this. All community action agencies, however, partner with other community based organizations. We count nearly 1,000 partner agencies who work with us to distribute funds, including some who are sub recipients. When ESG funds were recently put out for RFP by OHCS through a competitive process, and many areas saw no one other than community action agencies apply.
- We agree with Director Salazar's characterizations of current "best practices." Our concern is with the future, unknown and unknowable definitions of "best practices." The implementation of new practices always comes with conflict between funders, services provider and community norms. Selection of best practices has to be balanced against a calculus of whether those practices can feasibly be implemented. Time and place is everything in program implementation, and we believe that are most likely to be successful if the selection of which best practices to follow and when is left to OHCS discretion.
- We are in complete agreement with this statement by Director Salazar regarding the wisdom of suddenly adding new players to the service delivery system in the middle of pandemic: "Simply adding seats to the table without proper support and training will not set the individual provider or the system up for success."
- We appreciate Director Salazar's stated intent not to cause any funding to leave communities, but the Director's intent is not protected by the non-limiting and frankly,

contradictory language of the statute in Section 4 of the bill. At (6), the language would require funding to be distributed “in a manner proportionate to community need.” At (4) (c), it speaks to funding grantees based on outcomes. At (5) it speaks to “service equity in funding.” At (8)(b) it gives priority to culturally specific organizations, meeting federal match requirements, focusing on youth or family homelessness or addressing racial disparities in homelessness. In Section 5 (8), the bill says, “Federal funds must, to the extent consistent with federal law, be allocated statewide in a manner proportionate to a needs-based formula.” With this much ambiguity, it is not possible to say that no funding will leave any community. In fact, with just the variables in play in the statute itself as amended, there is high probability that funds will be shifted throughout communities.

- The argument that it is absolutely necessary to move on this legislation now omits the obvious: Oregon is in the process of rolling out the \$204 million in federal assistance to tenants and landlords. The stimulus package passed over the weekend will bring somewhere in the vicinity of another \$200 million to Oregon. The airplane is flying at full speed? Is now really the time to tinker with the engine?
- Community Action Agencies as well as legislators are still waiting for the data that show how community action agencies are failing to meet the challenge. Our current data pulled at the agency level, suggest we are equitably serving Oregonians. We know that we are partnering with culturally specific organizations. We know that during 2020, we delivered \$94 million in CARES Act funding for the relief of rent and energy burden. We know that the state’s inefficient data system has precluded the state from seeing data about statewide performance. We look forward to the day when we can actually see the data regarding system-wide performance.

Thank you for the opportunity to respond.

Sincerely,



Community Action Partnership of Oregon
Board of Directors