Secretary of State Audit Report

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Oregon Housing and Community Services Department: Program Duplication, Overlap and Fragmentation

Summary

The Oregon Housing and Community Services Department (Department) administers a wide array of 49 programs to help lower-income Oregonians obtain quality, safe and affordable housing and become self-sufficient. As Oregon's housing finance agency, the Department awards tax credits, and provides a variety of grants and loans for the development, acquisition, and rehabilitation of single family and multi-family housing. The Department is also responsible for administering many other federal and state anti-poverty programs, such as food and rent assistance programs.

In the past, the Department used distributions of available revenues from housing bond-financed loan programs to subsidize administrative costs of the other programs. However, because these revenues have decreased significantly due to economic factors, administering the other programs is becoming fiscally unsustainable for the Department. In response, the Governor's 2013-15 budget recommends one year of funding and calls for the Department to develop a plan to improve its service delivery model to address the fiscal challenges.

The objective of our audit was to determine if duplication, overlap or fragmentation exists among the programs the Department administers and/or among these programs and similar programs administered by other state agencies. Our review is based upon methods the U.S. Government Accountability Office (GAO) has used in analyses of federal programs, including using GAO's definitions of duplication, overlap and fragmentation applied to state programs.

- Duplication occurs when two or more programs provide the same services to the same beneficiaries. For example, the Department's Low Income Rental Housing Assistance and HOME Tenant Based Assistance programs both provide rent assistance to very low-income tenants.
- Overlap occurs when two or more programs have similar program missions or objectives, or provide similar services. Additional overlap can occur between these programs when they target similar beneficiaries and/or use similar delivery methods. For instance, the Department's Emergency Solutions Grant program overlaps with the programs noted

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- above because it can provide rent assistance; however, there is no duplication because the program provides numerous other services and specifically targets the homeless or those at risk of homelessness.
- Fragmentation occurs when more than one state agency is involved in the same broad area of need. As an example, four agencies provide programs with missions that focus on rent assistance: the Department, Oregon Health Authority, Department of Human Services and Department of Revenue.

Some duplication, overlap and fragmentation can be advantageous by providing complementary programs to cover geographic regions, or clientele served. For example, school meals for low-income children may be better delivered by the Department of Education than other agencies that provide food assistance programs, such as the Department of Human Services. Nonetheless, there may be opportunities to reduce duplication, overlap and fragmentation that could save taxpayer dollars and help to maximize performance and results of programs that share common outcomes.

We reviewed the Department's Single Family Housing, Multi-Family Housing, Homeless, Rent Assistance, Food, Energy and Weatherization, and Volunteer programs. We did not review these programs in detail to determine costs and benefits of program consolidation, whether programs' missions aligned with the administering agency's mission, or the extent of current levels of coordination among agency programs. Additionally, we limited our review to state administered programs. Finally, our review is based on our analysis of descriptive information of program missions, uses of and restrictions on funds, services provided, targeted beneficiaries and eligibility, and delivery methods.

Duplication exists among the Department program areas we reviewed except for the Single Family Housing, Multi-Family Housing and Volunteer programs. Energy and Weatherization programs show the greatest amount of duplication. The Department's two energy assistance programs, the Low Income Home Energy Assistance Program and the Oregon Energy Assistance Program both provide energy bill payment assistance to low-income households at or below 60% of the state median income. Further, all four of its weatherization programs provide weatherization services to low-income households and all target the elderly, children and people with disabilities. We also found varying degrees of overlap in program missions, services provided, targeted beneficiaries and service delivery methods, among all the Department's program areas we reviewed.

We identified 71 programs administered by 16 other state agencies that demonstrate duplication, overlap or fragmentation with the Department's programs. For example, food assistance programs are fragmented across four agencies: the Department, Department of Education, Oregon Health Authority and Department of Human Services.

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While fragmentation appears to be common, we found minimal duplication between the Department's programs and other state agency administered programs. Just five other state agency programs that provide food assistance services appear to duplicate a Department program: Oregon Health Authority's Nutrition and Health Screening Program for Women, Infants and Children, the WIC Farm Direct Nutrition Program and Senior Farm Direct Nutrition Program which show duplication with the Department's Commodity Supplemental Food Program, and the Department of Human Services' Supplemental Nutrition Assistance Program (SNAP) and SNAP Education, which show duplication with the Department's Emergency Food Assistance and Oregon Hunger Response Fund programs.

However, overlap occurs between many of the Department's programs and other state agency administered programs. We found this to be the case in all Department program areas. This overlap is often seen in services provided and program beneficiaries, with some overlap in program delivery methods.

We recommend Department management evaluate benefits and costs of reducing duplication, overlap and fragmentation among the Department's programs; work with other state agencies to evaluate benefits and costs of reducing duplication, overlap and fragmentation among similar programs; and where appropriate, include recommendations for consolidating or eliminating programs in its proposed plan for restructuring service delivery to be presented to the Governor and Legislature in February 2014.

Agency Response

The agency response is attached at the end of the report.

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Background

A 1990 Legislative Fiscal Office report found several agencies providing similar housing services to the same target groups. At that time, 23 housing programs were administered by five state agencies. In 1991, the Legislature merged the former Oregon Housing Agency with the Community Services Division from the Department of Human Resources to form the current Oregon Housing and Community Services Department (Department). This was done to provide a continuum of programs to help lower income Oregonians obtain quality, safe and affordable housing and become self-sufficient. Additionally, the merger was expected to increase efficiencies through administrative cost savings, thereby freeing up funds for programs. Since then, the Department has evolved to its existing structure which includes a wide array of 49 programs that provide a multitude of services to meet the needs of lower income individuals and families. The Department's mission is to provide leadership that enables Oregonians to gain housing, become self-sufficient and achieve prosperity.

As Oregon's housing finance agency, the Department sells tax-exempt housing bonds and uses the proceeds to finance low-rate mortgages for eligible first-time homebuyers and affordable housing for lower income families. Funds may also target specific beneficiaries such as first-time homebuyers, elderly and disabled persons, farm workers, and manufactured home park residents. The Department awards tax credits. and provides a variety of grants and loans for the development, acquisition, and rehabilitation of single family and multi-family housing.

Department housing programs are funded from federal, state, and other sources. Most of the programs rely upon the other sources, such as sales of tax-exempt bonds, fees, or tax credits. For example, the Oregon Affordable Housing Tax Credit program offers credits for affordable housing loans to encourage housing for low-income households. As another example, the Low Income Weatherization Program uses public funds collected by utility companies to increase efficiency of heating and other uses of energy in multi-family housing.

Report Number 2013-16 July 2013 Page 4 The Department also oversees approximately 270 contracts for U.S. Housing and Urban Development Section 8 properties, which provide subsidized housing to low-income households. Figure 1 shows the approximate 2011-13 biennium funding including debt service for Single Family and Multi-Family programs and the Section 8 program:

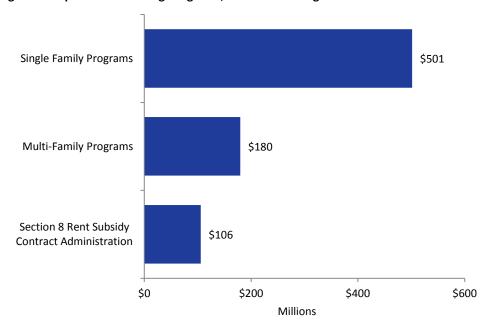


Figure 1: Department Housing Programs, 2011-13 Funding

While housing programs account for about 75% of the Department's budget, its mission extends beyond housing. The Department is also responsible for administering about 20 anti-poverty programs, about half of which are federally funded, and the rest state or other funded. The Department generally administers these programs through community partners, such as Community Action Agencies or other nonprofit organizations. These programs provide food, energy and weatherization assistance, rent assistance, and services for the state's homeless population. For example, the State Homeless Assistance Program provides funds to emergency shelters, and the Oregon Energy Assistance Program helps low-income households that have had their electric service disconnected or are at risk of being disconnected.

Report Number 2013-16 July 2013 **OHCSD Programs** Page 5 The largest anti-poverty program is the federally funded Low Income Home Energy Assistance Program, which provided approximately \$87 million for the 2011-13 biennium to assist low-income households with their energy costs. Figure 2 shows the approximate 2011-13 biennium funding for the anti-poverty programs:

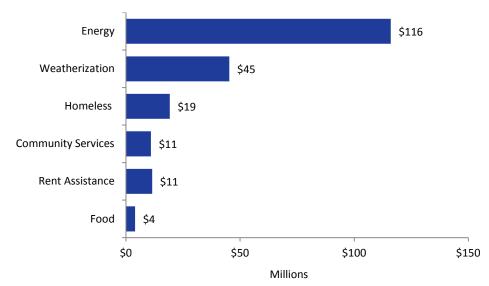


Figure 2: Department Anti-Poverty Programs, 2011-13 Funding

In addition to the above programs, the Department administers the following programs: the Oregon Volunteers, which includes the Volunteer Program, Civic Engagement Program, AmeriCorps Program and Oregon Volunteers Commission; Court Appointed Special Advocates; Individual Development Accounts; and the Capacity Building Program. These programs provide services to further strengthen communities, provide advocates for abused or neglected children until they are placed in safe homes, and assist lower income individuals to become self-sufficient.

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Department Faces Fiscal Challenges

Most of the Department's programs are funded with Federal and Other Funds. Other Funds include proceeds from bond sales, mortgage loan repayments, interest earnings, public funds collected by utility companies, and various fees and assessments. State General Funds account for only about 1% of the Department's budget and support only the anti-poverty programs. Figure 3 shows the approximate percentage of funds from various sources:

Figure 3: Department 2011-13 Legislatively Adopted Budget

	2011-13 Legislatively Adopted	Percent
General Fund	\$ 10,018,855	1.0
Lottery Funds	10,383,766	1.0
Other Funds	140,534,236	13.4
Other Funds (Non Limited*)	580,486,383	55.3
Federal Funds	203,039,554	19.4
Federal Funds (Non Limited*)	104,229,868	9.9
Total	1,048,692,662	100.0

^{*}Non Limited funds are from a self-supporting revenue source and are dedicated to a specific purpose. The Legislature does not place limitations on these funds; they can be expended up to the amount of available revenues.

In the past, the Department used distributions of available revenues from multi-family and single family housing bond-financed loan programs to subsidize administrative costs of other programs, such as food and rent assistance programs. As of the end of December 2012, more than 25% of the Department's programs had administrative costs for the 2011-13 biennium that were being subsidized. This included 100% of the Low Income Rental Housing Assistance's administrative costs and over 90% of the Vertical Housing Program's administrative costs.

However, administering these other programs is becoming fiscally unsustainable for the Department, as available revenues have significantly decreased over the past few years due to economic factors. The recent slow economy and higher unemployment rates have resulted in fewer homebuyers and a decrease in demand for housing loans. Also, with low interest rates across the market, it has become more difficult for the Department's loan programs to offer mortgage interest rates that are below current market rates. Additionally, Single Family Housing Program expenses, such as costs associated with foreclosed properties, have increased significantly, leaving fewer funds available for other programs.

Citing the Department's fiscal challenges, the Governor's 2013-15 balanced budget recommends one year of funding for the Department and calls for Department management to develop a plan to improve the current housing and community service delivery model. The Department must present its plan to the Legislature in February 2014, after which the second year of funding for the Department will be determined.

Number of Programs Grows Despite Prior Consolidation Efforts

Although consolidation efforts led to the creation of the current Department in 1991, more state and federal programs were added throughout the 1990s. This included programs such as the Housing Development Guarantee Grant Program, federal HELP Program, Emergency Housing Assistance to assist homeless persons, Home Ownership Assistance Program, and Oregon Rural Rehabilitation Program for farm worker housing.

In 1998, Governor Kitzhaber called for changes in state government, including assessing the work of agencies that deal with housing needs of low-income Oregonians, and working to eliminate redundancies and improve efficiencies. Within the next few years, the Department proposed efforts and worked to coordinate and streamline its programs, including partnering with other state and local service providers, and aligning funding processes.

However, the Department continued to be assigned new roles. For example, the Legislature transferred the Oregon Commission on Voluntary Action and Services, and the Farmworker Housing Tax Credit program to the Department. By 2001, the Department was administering approximately 37 programs across several program areas. The Department continued to pursue and receive funding for additional new programs and was assigned others by the Legislature, such as the Vertical Housing Program and General Housing Account Program. By the 2009-11 biennium, the Department was responsible for administering approximately 50 programs.

Monitoring for Program Duplication and Overlap and Promoting Collaboration

State law assigns the Department responsibility for reviewing housing programs for duplication or overlap and for notifying appropriate state agencies, governmental bodies and housing sponsors if it does. The Department is also charged as a lead agency in coordinating multi-agency homelessness services to provide seamless and timely delivery.

Department management was not aware of any prior formal agency efforts to review programs for duplication or overlap, but told us some efforts have occurred or are underway to collaborate with other state agencies in providing program services. For example, the Department partners with the Department of Human Services (DHS) and local public service agencies to administer the Housing Stabilization Program, which assists families with children who are homeless or at risk of homelessness. It also provides Low Income Home Energy Assistance Program funding to Oregon Health Authority (OHA) and works with the Department of Justice (DOJ) to coordinate foreclosure prevention and mediation services. These types of collaboration could offer opportunities to leverage different agency strengths to more effectively promote housing or anti-poverty assistance, in addition to making better use of taxpayer dollars.

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Audit Results

Introduction

The objective of our audit was to determine if duplication, overlap, or fragmentation exists among the programs administered by the Oregon Housing and Community Services Department (Department) and/or among these programs and similar programs administered by other state agencies.

The Government Accountability Office (GAO) produced a series of reports on duplication, overlap, and fragmentation across many federal program areas. Our review is based upon methods the GAO used, including applying the GAO's definitions of duplication, overlap and fragmentation within the context of state programs. The definitions are:

- Duplication occurs when two or more programs provide the same services to the same beneficiaries. For example, the Department's Low Income Rental Housing Assistance and HOME Tenant Based Assistance programs both provide rent assistance to very low-income tenants with household incomes not exceeding 50% of the area median income.
- Overlap occurs when two or more programs have similar program missions or objectives, or provide similar services. Additional overlap can occur between these programs when they target similar beneficiaries and/or use similar delivery methods. For instance, the Department's Emergency Solutions Grant program overlaps with the programs noted above because it can provide rent assistance; however, there is no duplication because the program provides numerous other services and specifically targets the homeless or those at risk of homelessness.
- Fragmentation occurs when more than one state agency is involved in the same broad area of need. As an example, four agencies provide programs with missions that focus on the area of rent assistance: the Department, Oregon Health Authority, Department of Human Services and Department of Revenue.

We limited our review to state administered programs. Additional housing and community services programs are administered federally and locally by cities, counties or regional offices. We identified 71 programs at 16 other state agencies that had program missions or services similar to one or more of the Department's programs.

Our review was also limited to an overview of Department and other state agency administered programs. This included a review of descriptive information of program missions, uses and restrictions, services provided, targeted beneficiaries and eligibility, and delivery methods. We did not conduct a detailed review of any programs to determine costs and benefits of program consolidation, whether program missions aligned with the administering agency's mission, or the extent of current levels of coordination among agency programs. Further work should be done in

these areas. Additionally, although we used several resources to identify state agency administered programs that might be similar to those administered by the Department, there may be other programs that we did not identify.

Effects of Duplication, Overlap and Fragmentation

Some occurrences of duplication, overlap and fragmentation can be advantageous by providing similar programs or services that are complementary as to geographic regions covered or clientele served. For example, school meals for low-income children may be better administered by the Department of Education than by other agencies that administer food assistance programs, such as the Department of Human Services.

Also, the availability of multiple programs with similar benefits helps ensure those in need have access to program services. For example, several rent assistance programs have specific targeted beneficiaries, including the Department of Human Services' Independent Living Housing Subsidy Program, which benefits youth in foster care ages 16 to 21, and the Department of Revenue's Elderly Rental Assistance program.

Some duplication, overlap and fragmentation may be necessary as a result of federal eligibility rules and requirements. For example, many programs administered by the Department and by other state agencies often have their own federal reporting, compliance and accounting requirements.

Nonetheless, duplication, overlap and fragmentation may also produce inefficiencies. These include a possible redundancy of administrative activities when similar programs are administered by separate state agencies. Duplication, overlap or fragmentation may also hinder assessment of program accomplishments and accountability accepted by different state agencies for outcomes related to the different statewide goals. For example, there are several programs administered by different state agencies addressing the homeless population. Discerning which programs are most effective may be difficult if outcome measures are not aligned toward the same statewide goals. Additionally, multiple agencies administering multiple programs directed at achieving the same statewide goals increases the need for greater interagency coordination, which carries additional costs.

Further, there can be a burden to program beneficiaries, as well, who must take additional steps to obtain needed services. For example, applicants seeking nutrition assistance from more than one program may be required to submit separate applications for each program and provide similar information, such as income verification, in order to receive benefits.

Reducing or eliminating duplication, overlap, or fragmentation could result in efficiencies that save taxpayer dollars and help maximize performance and results of programs that share common outcomes. Possible ways to decrease inefficiencies might include establishing compatible policies and

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Additional evaluation is needed to review programs in detail and determine where efficiencies could be achieved. This could include making a complete inventory of programs, the extent of overlap or duplication, performance information, applicable statutory rules, and additional information on how individual programs fit within statewide goals.

Duplication and Overlap among Department Programs

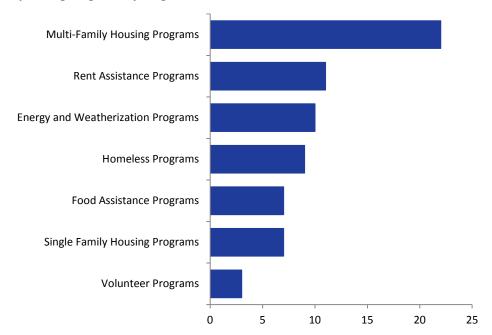
The Department categorizes its 49 programs into the following areas: Single Family Housing, Multi-Family Housing (including the HUD Section 8 Program), Safety Net, Energy and Weatherization, and Other. Safety Net programs are further divided into the following smaller program areas: Homeless, Rent Assistance, Food, and Community Services. Other programs include Volunteer programs, the Individual Development Accounts program and the Capacity Building program.

We reviewed the following program areas for duplication and overlap: Single Family Housing, Multi-Family Housing, Homeless, Rent Assistance, Food, Energy and Weatherization, and Volunteer programs. Duplication exists among Department programs in these program areas except for Single Family Housing, Multi-Family Housing and Volunteer programs. Energy and Weatherization programs show the greatest amount of duplication. The Department's two energy assistance programs, Low Income Home Energy Assistance Program and Oregon Energy Assistance Program, are duplicative as are all four of its weatherization programs. Aside from the Energy and Weatherization programs, the following programs also show duplication:

- Emergency Food Assistance Program and Oregon Hunger Response Fund
- State Homeless Assistance Program and Emergency Solutions Grant
- HELP/Financing Adjustment Factor and General Housing Assistance Program
- Low Income Rental Housing Assistance and HOME Tenant Based Assistance

Further, aside from Energy and Weatherization programs, which all show duplication, we found overlap among the Department's programs for all areas we reviewed. This includes varying degrees of overlap in program missions, services provided, targeted beneficiaries and service delivery methods. Figure 4 shows the number of overlapping and duplicating programs within the Department by each program area:

Figure 4: Number of Department's Overlapping and Duplicating Programs by Program Area



Duplication, Overlap and Fragmentation with Other State Agencies

We identified 71 other programs administered by 16 other state agencies that demonstrate duplication, overlap or fragmentation with the Department's programs. Figure 5 shows how the 71 programs break down by agency:

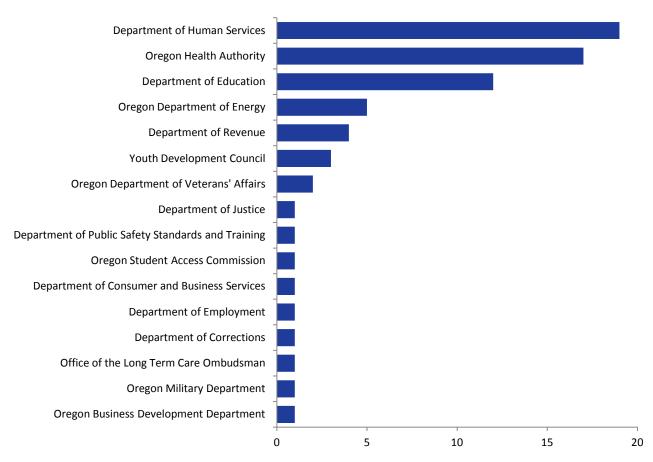


Figure 5: Number of Similar Programs at Other State Agencies

Except Volunteer programs, services are fragmented across two or more agencies for all of the program areas. For example, the Department, Department of Education, Oregon Health Authority and Department of Human Services all provide programs with missions focused on providing food and nutrition education.

While fragmentation seems to be common, we found minimal duplication among Department and other state agency administered programs. Just five other state agency programs that provide food assistance services appear to show duplication with a Department program. Specifically, the Oregon Health Authority's Nutrition and Health Screening Program for Women Infants and Children, WIC Farm Direct Nutrition Program and

Senior Direct Nutrition Program show duplication with the Commodity Supplemental Food Program, and the Department of Human Services' Supplemental Nutrition Assistance Program (SNAP) and SNAP-Education show duplication with Emergency Food Assistance and Oregon Hunger Response Fund programs.

Overlap occurs among many Department and other state agency administered programs in all program areas. The Department's Single Family and Multi-Family Housing programs show a small amount of overlap with other state agency administered programs. However, the antipoverty programs, including programs for the homeless and programs that provide rent assistance, food assistance or energy and weatherization assistance, show a greater amount of overlap with other state agency administered programs. Overlap is often seen in services provided and program beneficiaries, with some overlap in program delivery methods.

Program Areas

The following sections present more detailed information about the different Department program areas and where we noted evidence of duplication, overlap and fragmentation among the Department's programs and with other state agency administered programs. Appendix A shows a listing of these programs with descriptive information including program missions, services, targeted beneficiaries and eligibility and delivery methods.

Single Family Housing Programs

Single Family Housing services are fragmented across three state agencies that administer programs with missions or objectives focusing on single family homebuyer education and finance assistance, and homeowner foreclosure prevention: the Department, Oregon Department of Veterans' Affairs (ODVA) and Department of Justice (DOJ). The Department houses four programs: the Home Owner Assistance Program, Residential Loan Program (RLP), Foreclosure Prevention program and Neighborhood Stabilization Program. The other agencies have one each.

Figure 6 shows the 2011-13 biennium funding for these six programs:

Figure 6: 2011-13 Funding for Single Family Housing Programs

Agency	Number of Single Family Housing Programs	2011-13 Funding (rounded)
Oregon Housing and		
Community Services		
Department	4	\$501,500,000
Oregon Department of		
Veterans' Affairs	1	443,100,000
Department of Justice	1	1,500,000

^{*}Department and ODVA single family loan programs are non-limited

Report Number 2013-16 July 2013 **OHCSD Programs** Page 14 Although these six programs do not show evidence of duplication, there is overlap among program services, targeted beneficiaries, and/or delivery methods. The Department's RLP and ODVA's Oregon Veterans' Home Loan Program (ORVET Home Loans) both provide below-market, low interest mortgage loans and are delivered through mortgage lenders and brokers. However, RLP is targeted to low-income families and individuals and is limited to first-time homebuyers, while ORVET Home Loans is targeted to veterans and is not limited to first-time homebuyers or by income. There is also overlap between the Department's Foreclosure Prevention program and the DOJ's Foreclosure Avoidance Mediation Program. Both programs' missions include assisting Oregonians in avoiding foreclosure to allow them to stay in their homes. However, services provided are different; the Department's program provides foreclosure counseling services, foreclosure prevention information, and legal assistance, whereas DOJ's program provides mediation services.

In addition to these six programs, the Department has three other programs that do not have a core mission specific to single family housing, but do allow program funds to be used for home purchase assistance or homebuyer education, including avoiding foreclosure. The federally funded HOME program allows funds to be used for financing low-income first-time homebuyer second mortgage loans or for providing down payment or closing costs. The Individual Development Accounts program allows eligible individuals to withdraw funds for a primary residence purchase. Finally, the Capacity Building program includes homeownership purchase and foreclosure prevention services.

Figure 7 shows goals and beneficiaries of the various programs that provide single family housing assistance (columns with multiple dots indicate areas of overlap).

Figure 7: Programs Providing Single Family Housing Assistance

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Programs	,	,	,	1			,	,	1	f
Oregon Housing and Community Service	es Departi	ment - Sin	gle Fami	ly Prograi	ns					
Home Owner Assistance Program	•	•	•			•	•	•		
Residential Loan Program	•					•		•		
Foreclosure Prevention			•				•	•		
Neighborhood Stabilization Program				•				•		
Oregon Housing and Community Service	es Departi	ment - Otl	her Progr	ams						
Individual Development Accounts					•			•		
HOME Program (HOME CHDO &										
Investment Partnership Program)		•				•		•		
Capacity Building	•						•	•		
Oregon Department of Veterans' Affair	s									
Oregon Veterans' Home Loan	•								•	
Department of Justice										
Foreclosure Avoidance Mediation										
Program			•				•			

Multi-Family Housing Programs

The Department's 18 Multi-Family Housing programs provide low-interest loans, grants and tax credits or exemptions for affordable multi-family housing developments. Developments can be new constructions, acquisitions or rehabilitations of existing buildings and may be funded through a combination of programs. The Department also oversees approximately 270 contracts for U.S. Housing and Urban Development Section 8 properties through the Section 8 Rent Subsidy Contract Administration program.

Of the 18 Multi-Family Housing programs, the Department administers 17 that share a common purpose of expanding the supply of affordable housing for low and/or very low-income households. With the exception of the HOME Program, which is federally funded, all of the programs are funded by tax credits and exemptions or are funded in other ways such as loans funded through bond issues, interest, fees and loan repayments.

Although most of the programs have specific requirements for housing developments and beneficiaries, and therefore do not show duplication, we noted instances of overlap among the Department's programs, including the following:

- The Farmworker Housing Development Program and the Oregon Rural Rehabilitation (ORR) Program both provide funds for construction, acquisition or rehabilitation of housing for low-income farm workers. According to Department management, ORR will receive no additional funding. Also the Farmworker Housing Tax Credit Program encourages rehabilitation or construction of additional farm worker housing.
- The Department's Elderly and Disabled program provides below-market interest loans for affordable multi-unit rental housing developments. The HELP/Financing Adjustment Factor program provides grants to three distinct populations, including group homes for people with developmental disabilities.
- The Pre-Development Loan Program provides loans for typical predevelopment costs such as site acquisition and architectural plans, as does the Housing Development Grant Program and General Housing Assistance Program.
- The Manufactured Home Park Purchase Program provides loans for assistance with pre-purchase costs of manufactured home parks and is targeted solely to manufactured home park tenants. The General Housing Assistance Program funds a variety of developments, including manufactured dwelling park preservation.
- The Low Income Weatherization Program provides funds to multi-family housing developers for energy efficiency projects. Three other Department administered weatherization programs allow use of funds for multi-family developments: the U.S Department of Energy and Bonneville Power Administration's programs, and the LIHEAP Weatherization program. According to Department management, none of these three programs are currently being used for multi-family developments.

One other state agency, the Oregon Health Authority (OHA), has programs with missions that focus on providing funding for multi-family housing development, thereby creating some degree of fragmentation. OHA administers three programs that fund housing developments. OHA's Alcohol and Drug Free Housing Development provides funding for acquisition and/or renovation of housing developments for persons in recovery. OHA also has two housing development programs that target persons with chronic or severe mental illness: the Mental Health Services Housing Fund program and Community Mental Health Housing Trust Fund program. All three of these programs overlap with the Department's HELP/FAF program, which provides funding for housing development for persons in recovery and those with developmental disabilities or chronic mental illness.

Report Number 2013-16 July 2013 **OHCSD Programs** Page 17 Of the Department's 18 Multi-Family Housing programs, three provide tax credits and one program provides property tax exemptions for multi-family housing development. The approximate amount of credits awarded in 2012 for the three tax credit programs was \$26 million.

Figure 8 shows the 2011-13 biennium funding for the Department's 14 additional Multi-Family Housing programs and the OHA's programs with missions that focus on multi-family housing:

Figure 8: 2011-13 Funding for Multi-Family Housing Programs

Agency	Number of Multi-Family Housing Programs	2011-13 Funding (rounded)
Oregon Housing and Community Services	14	\$179,600,000*
Oregon Health Authority	3	1,900,000

^{*}Conduit Bond Program funds are not included. Conduit bond proceeds go directly to the housing development project sponsors.

Three more state agencies also administer programs with overlapping services for multi-family housing:

- The Department of Human Services administers the Developmental Disability Community Housing Program/Community Integration Program Maintenance and Repair that can provide funds for rehabilitation of multi-family developments targeted to people with disabilities.
- The Department of Energy administers five programs that provide different financing mechanisms including grants, loans, tax credits, or cash rebates for energy conservation or renewable energy projects that can be used for multi-family developments. Most of these programs do not specifically target low-income households. These programs overlap with the Department's Low Income Weatherization Program that provides grants for energy efficiency projects in low-income housing developments.
- The Oregon Business Development Department administers the Community Development Block Grant that provides grants for housing rehabilitation targeting low-income households.

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Figure 9 shows goals and beneficiaries of the various programs that can provide funds for multi-family housing (columns with multiple dots indicate areas of overlap):

Figure 9: Programs Providing Multi Family Housing Services

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General Housing and Community Services Department: Multi-Family Development Programs General Housing Assistance Program Multi-Family Board Program Conduct Bond Program Condu		elop/I	ease	ease	note.	st wit	and S _L	st Ma	italiza	1		/ N		heles,	neow,		Infact	ple w	ple w	Sons ir	ate O
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In addition to the 32 programs in Figure 9, there are several tax expenditures, including deductions, credits and exemptions, which promote low-income housing developments or energy efficiencies that can apply to multi-family developments. For example, the Farmworker Housing Lender's Credit provides a tax credit to lending institutions financing construction or rehabilitation of farm worker housing projects. Another tax expenditure, the Nonprofit Low Income Rental Housing property tax exemption, encourages nonprofit organizations to help fill the need for low-income housing. A listing of these tax expenditures is shown in Appendix B.

Programs for the Homeless

Four state agencies provide programs with missions and/or objectives that have a primary focus of providing support services to the homeless population, resulting in fragmented services: the Department, Department of Education (ODE), OHA and DHS. These programs aim to prevent and end homelessness through services such as emergency shelter, transitional housing, rent assistance, case management, and education.

We found duplication among some of the Department administered programs. For example, the State Homeless Assistance Program and Emergency Solutions Grant program both provide funding for emergency shelters, including renovation and operational costs of shelters, and costs related to support services for the homeless. Also, the HELP/Financing Adjustment Factor program and General Housing Assistance Program both work to increase housing for the homeless through housing development, acquisition or rehabilitation.

A total of nine Department programs show some degree of overlap in services for the homeless. Six of these programs exist to meet the needs of the homeless population, while three have broader missions and objectives but include services for the homeless. For example, the multi-family development program HELP/Financing Adjustment Factor provides funding to increase housing for three populations: the homeless, persons in recovery, and those with developmental disabilities or chronic mental illness.

We noted additional overlap in services for the homeless among the Department programs and those administered by other state agencies. Five other state agency administered programs, shown in Figure 10, have missions and/or objectives that focus on the homeless population:

Figure 10: Other State Agency Administered Homeless Programs

Agency	Program
Department of Education	Education for Homeless Children and Youth
Oregon Health Authority:	Projects for Assistance in Transition from Homelessness
	 Oregon Housing Opportunities in Partnership
	Supportive Housing Program
Department of Human Services:	Runaway and Homeless Youth Program

Another 12 state agency administered programs include the homeless or those at risk of homelessness as target beneficiaries, or specify they provide services to the homeless.

As shown in Figure 11 below, of the total 26 programs:

- 16 provide some type of shelter and/or housing assistance
- 11 provide support services such as counseling, case management, employment assistance or health care
- 9 include children in their targeted beneficiaries.

Figure 11: Programs Providing Services to Homeless

				Sen	vices 1	for Ho	mele	ess							В	enefi	ciaries	s			
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Programs																					
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State Homeless Assistance Program	Ь		•				•	1				•						ш			
Housing Stabilization Program			•				•			•		•	•								
Rent Guarantee Program					•							•	•								
Community Services Block Grant			•	•						•	•	•	•						•		
HELP / Financing Adjustment Factor						•						•	•			•		•			
General Housing Assistance Program						•						•	•						<u> </u>		
Housing Permanent Living Utilizing Services	<u> </u>		•		•	•						•						•			
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Department of Human Services							_	4	_												
Runaway and Homeless Youth Program			•	•			•	4	⊢	•		•					lacksquare	igspace	\vdash		
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Temporary Assistance for Domestic Violence																					
Survivors		•			•			-	⊢			•	•					•		<u> </u>	ł
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Education for Homeless Children and Youth	_	-	-	_		_	_	-	⊢	•	-	•		-		-	\vdash	\vdash	├	-	ł
Child and Adult Care Food Program				•				-	⊢	•	•	•				•		$\vdash \vdash$		-	ł
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National School Lunch Program	—			•				-	\vdash	•			•				\vdash	igspace	<u> —</u>	—	ł
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Disabled Veterans' Outreach Program	Щ		•	<u> </u>	<u> </u>	<u> </u>	<u> </u>	-	\vdash		<u> </u>			<u> </u>		l	•	ш		Щ	ł
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Rent Assistance Programs

Four state agencies provide 13 programs with missions and/or objectives that focus on rent or housing assistance, resulting in fragmentation: the Department, OHA, DHS and Department of Revenue (DOR). Included within these 13 programs are three programs that provide benefits through tax exemptions or deferrals. For the 2011-13 biennium, the total funding for these programs (not including the two tax deferral programs at DOR, which are designed to be self-funding) is approximately \$40 million (see Figure 12).

Figure 12: 2011-13 Funding for Rent and Housing Assistance Programs

Agency	Number of Rent and Housing Assistance Programs	2011-13 Funding (rounded)
Oregon Housing and		
Community Services	3	\$11,500,000
Oregon Health Authority	3	5,400,000
Department of Human Services	3	18,100,000**
Department of Revenue	2	5,200,000*

^{*} Does not include two tax deferral programs

The Department's Low Income Rental Housing Assistance (LIRHA) and HOME Tenant Based Assistance (HOME TBA) programs show duplication, as both provide rent assistance to very low-income beneficiaries. Additionally, with both programs, the funds move with the tenants instead of being assigned to a rental unit, and both are delivered by Community Action Agencies.

The Department's Housing Permanent Living Utilizing Services (Housing PLUS) program overlaps with the LIRHA and HOME TBA programs in providing rent assistance services. However, the Housing PLUS program targets the homeless and victims of domestic violence.

No duplication was noted between the Department's rent assistance programs and the 10 other state agency administered rent assistance programs. Generally, most of the programs provide assistance to low-income households or individuals, and four programs target homeless or those at risk of homelessness. However, as shown in Figure 13, almost all of the other agency administered programs have an additional targeted beneficiary group. For example, the Oregon Housing Opportunities in Partnership program targets people with AIDS and the Chafee Housing Program targets former foster youth ages 18 to 21.

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^{**}Includes total amount for DHS' Independent Living Program, which includes Independent Living Housing Subsidy Program, Chafee Housing Program, and additional activities.

Figure 13: Programs Providing Rent or Housing Assistance Services

						Ren	ntal/Ho	using	Service	es				Benefi	ciaries
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Low Income Rental Housing Assistance		<u> </u>		•		-	•			l					
HOME Tenant Based Assistance				•			•								
Housing Permanent Living Utilizing		•	•	•		1		•	•						
Oregon Health Authority	•				1	1							•		
Oregon Housing Opportunities in															
Partnership				•			•	•							
Alcohol and Drug Free Housing Assistance															
Services				•			•	•							
Oregon Recovery Homes				•	•	1		•			•				
Department of Human Services															
Temporary Assistance for Domestic															
Violence Survivors	ı			•			•		•						
Independent Living Housing Subsidy	•			•								•			
Chafee Housing Program	•			•								•			
Oregon Department of Revenue															
Elderly Rental Assistance	•			•			•							•	
Nonprofit Corporation Housing for Elderly															
Persons Program				•			•							•	
Senior Citizen's Property Tax Deferral	•			•			•							•	
Disabled Citizen's Property Tax Deferral															
Program	•			•			•						•		

In addition to the 13 programs that have missions or objectives focusing on rent or housing assistance, as shown in Figure 14, 27 other programs can provide rent or housing assistance, or assistance with obtaining housing, as part of the services they provide:

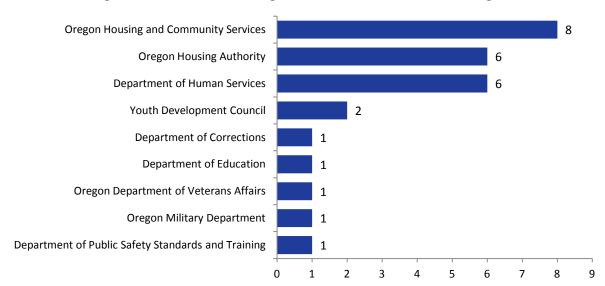


Figure 14: Number of Other Programs That Can Provide Rent or Housing Assistance

Food Assistance Programs

Food assistance programs help ensure an adequate diet to promote the health and well-being of individuals and households. These programs provide food and nutrition assistance in several ways, including prepared meals, commodities, nutrition education, and vouchers or funds to be used in food retail locations. Generally, programs are targeted to low-to moderate income individuals or households, and often to select groups such as pregnant women, school-age children, and seniors. Several programs are federally funded school nutrition programs, such as the National School Lunch Program and the School Breakfast Program, and are administered by the ODE.

We found 22 programs with missions or objectives focusing on food. nutrition and/or nutrition education are fragmented across four state agencies: the Department, ODE, OHA and DHS. For the 2011-13 biennium, total funding for these programs is about \$3 billion, with the Supplemental Nutrition Assistance Program (SNAP-formerly the Food Stamp Program) accounting for 84% of this amount. Of the 22 programs, the Department administers four, with total 2011-13 biennial funding of approximately \$4 million, roughly 0.1% of total funding for all these programs.

Figure 15: 2011-13 Funding for Food Assistance Programs

Agency	Number of Food Assistance Programs	2011-13 Funding (rounded)
Oregon Housing and Community		
Services Department	4	\$ 4,000,000
Department of Education	9	265,300,000
Oregon Health Authority	4	180,400,000
Department of Human Services	5	2,550,700,000

These food and nutrition assistance programs also show signs of duplication and overlap. The Department administered Emergency Food Assistance Program and Oregon Hunger Response Fund program are duplicative; both distribute food to households with income that does not exceed 185% of the federal poverty guideline. The first program is federally funded while the second is state funded.

We found other state agency administered programs that show duplication with the Department's programs. These include DHS's SNAP and SNAP-Education programs which, like the Department's Emergency Food Assistance Program and Oregon Hunger Response Fund program, provide food and nutrition education to low-income households. There is also duplication between the Department's Commodity Supplemental Food Program (CSFP) and three OHA programs. The CSFP and OHA's Nutrition Health and Screening Program for Women Infant Children (WIC Program) and WIC Farm Direct Nutrition Program all provide food and nutrition education for pregnant women and children five years of age and younger. Also the CSFP and OHA's Senior Farm Direct Nutrition Program both provide food and nutrition education to low-income seniors age 60 and older.

In addition to these areas of duplication, most of the programs show signs of overlap. For example, individuals eligible for groceries through the Commodity Supplemental Food Programs are also generally eligible for groceries through the Emergency Food Assistance Program and the Oregon Hunger Response Fund program, and for SNAP targeted benefits redeemed through the Electronic Benefits Transfer card. As another example, several of the Area Agencies on Aging, which deliver DHS administered senior nutrition program services, are also designated Community Action Programs that receive funds through the Department.

Overlap of similar services to similar targeted populations among the 22 programs, as shown in Figure 16, includes the following:

- 20 programs provide food, vouchers or funds that can be used to purchase food.
- 12 programs provide nutrition education; four of these are the Department's programs.

- 18 programs target low-income individuals or households, including four Department programs.
- 16 other state agency administered programs target beneficiaries other than low-income individuals/households that are similar to those the Department targets.

Figure 16: Programs Providing Food Assistance and/or Nutrition Education

				Servic	es				В	enefic	iaries			
	$f_0^{OO_{q}}$	Nutrition Nutrition	[100d 100d	Pregn	Children A.	Infants	People	Elderty.	Farm West	Homeless	Low-these	Na tive 4	Rural Househous	Region Geographic
Programs														
Oregon Housing and Community Services Depo		<u> </u>												
The Emergency Food Assistance Program		•	_								•			
Oregon Hunger Response Fund		•									•			
Commodity Supplemental Food Program		•	_	•	•			•			•		•	
Food Distribution Program on Indian		•									•	•	•	
Reservations	5													
Oregon Health Authority														
Nutrition and Health Screening Program for	اء													
Women, Infants, and Children (WIC Program)		•		•	•	•					•			
WIC Farm Direct Nutrition Program	1 •	•		•	•	•					•			
Senior Farm Direct Nutrition Program	•	•						•			•			
Physical Activity and Nutriton Program	n	•			•									
Department of Human Services														
Summer Electronic Benefit Transfer for Children					•						•			
Supplemental Nutrition Assistance Program	•										•			
Supplemental Nutrition Assistance Program- Education		•									•			
Senior Nutrition Program (Oregon Congregate and Home-Delivered Nutrition Program)		•						•			•			
Nutrition Services Incentive Program	1 •							•			•			
Department of Education	_													
Farm to School and School Garden Programs	•	•			•									
Child and Adult Care Food Program	1 •				•		•	•		•				
At-Risk Program (After School Snacks)	•	•			•						•			
National School Lunch Program					•						•			
School Breakfast Program	•				•						•			
Summer Food Service Program for Children	1 •				•						•			
Seamless Summer Option					•						•			
Fresh Fruit and Vegetable Program					•						•			
Special Milk Program for Children					•									
	•		-		•							!		•

In addition to the 22 programs that have missions or objectives focusing on food, nutrition and/or nutrition education, the following programs can provide food, or funds that can be used for food, as part of the services they provide:

Oregon Housing and Community Services Department

- State Homeless Assistance Program
- Housing Stabilization Program
- Community Services Block Grant

Oregon Health Authority

Ryan White/HIV Care Formula Grants

Department of Human Services

- Independent Living Housing Subsidy Program
- Chafee Housing Program
- Runaway and Homeless Youth Program
- Temporary Assistance for Needy Families

Oregon Department of Education

Oregon Head Start Prekindergarten Program

Oregon Department of Veterans Administration

Oregon Veterans' Emergency Financial Assistance Program

Oregon Military Department

Emergency Financial Assistance Program

Several of these programs have specific targeted populations. For example, the Chafee Housing Program provides a limited number of payments to assist former foster youth ages 18 to 21 years with the costs of room and board. However, a few of these programs' target populations overlap with those of the four Department programs that have missions or objectives focusing on food and nutrition.

Energy and Weatherization Programs

Energy Assistance

The Department administers two energy assistance programs: the Oregon Energy Assistance Program (OEAP) and Low-Income Home Energy Assistance Program (LIHEAP). The OEAP program is funded from fees added to customers' utility bills, and the LIHEAP program is federally funded. The total funding for the 2011-13 biennium for these two programs is approximately \$116 million.

These two programs show duplication. Both provide energy bill payment assistance to low-income households at or below 60% of Oregon's median income. Additionally, both programs are administered through local

Community Action Agencies. The LIHEAP program also funds heating system repair, case management and home weatherization services.

OHA also oversees a LIHEAP program through its Oregon Housing Opportunities in Partnership (OHOP) program that provides energy bill payment assistance However, the program is limited to OHOP's low-income clients living with HIV or AIDS. The Department dedicates a portion of LIHEAP funds to be used for this program; for the 2011-13 biennium that portion totals \$120,000.

We did not find evidence of fragmentation; no other state administered programs have a core mission to provide energy bill payment assistance. Nor did we find other state agency administered programs that show duplication with OEAP and LIHEAP.

However, there are other state agency administered programs that show overlap in services provided. Temporary Assistance for Needy Families provides funds to low-income households that can be used for energy bill payment assistance. Also, there are six more overlapping programs that can provide energy assistance payments as part of emergency support assistance:

- Emergency Solutions Grant
- Emergency Housing Assistance
- Housing Stabilization Program
- Temporary Assistance for Domestic Violence Survivors
- Oregon Veterans Emergency Financial Assistance Program
- Emergency Financial Assistance Program

Report Number 2013-16 July 2013 Page 28 While there is overlap in services provided by OEAP, LIHEAP and the other programs, the other programs target a more specific beneficiary population than OEAP and LIHEAP. Figure 17 shows the energy assistance programs at the Department and four other state agencies (columns with multiple dots indicate areas of overlap).

Beneficiaries , Oregon National Guard Airmen and Soldiers **Delivery Method** Low-Income Individuals/Households Victims of Domestic Violence | Community Action Network | Non-Profit Organizations | People with Disabilities | Private Organizations l ^{Local} Government | Native Americans l People with AIDS **d** Children∕Youth l Farm Workers 1^Agency Direct l Veterans Elderly **Programs Oregon Housing and Community Services Department** Oregon Energy Assistance Program Low Income Home Energy Assistance Program **Emergency Solutions Grant** • **Emergency Housing Assistance** Housing Stabilization Program Oregon Health Authority Low Income Home Energy Assistance Program (through OHOP) **Department of Human Services** Temporary Assistance for Needy **Families** Temporary Assistance for Domestic Violence Survivors Oregon Department of Veterans Services Oregon Veterans Emergency

Figure 17: Programs Providing Energy Assistance

Weatherization Programs for Low-income Households

Weatherization assistance programs provide conservation services, health and safety repairs, heating system repair and replacement, baseload measures and energy education to households at or below 60% of Oregon's median income. The Department's programs are administered through local community based organizations, including Community Action Agencies, senior centers, housing authorities and tribal governments.

Currently, the Department administers four weatherization programs that show duplication in weatherization services to low-income households. Further, these programs all target elderly, children and people with disabilities. Three of the programs, LIHEAP, U.S. Department of Energy –

Financial Assistance Program

Oregon Military Department

Emergency Financial Assistance

Weatherization Assistance Program, and Bonneville Power Administration program are federally funded, while one program, Energy Conservation Helping Oregonians, uses public funds from utility companies.

We found a small amount of fragmentation; just one other state agency, the Department of Energy, administers a program with a mission to provide weatherization services. This is the Department of Energy's State Home Oil Weatherization (SHOW) program, which overlaps with the Department's programs. The SHOW program provides cash rebates, funded through a petroleum supplier assessment, for installed weatherization and heating measures to Oregon households that heat with oil, propane, kerosene, butane or wood. The program is available to homeowners, renters and residential building owners. Additionally, low-income households can receive weatherization services through the SHOW program from a Community Action Agency or other agency serving low-income households. which then apply for the rebate. Community Action Agencies also provide the services for the Department's weatherization programs.

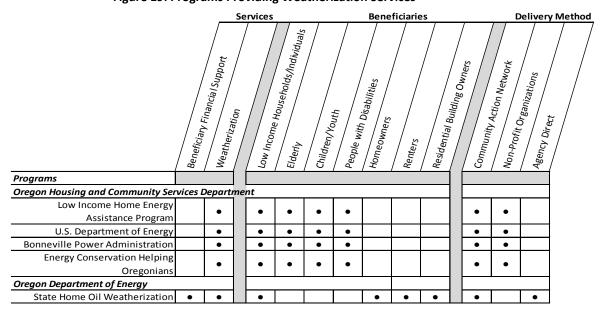
Figure 18 shows the 2011-13 biennium funding for the Department's and the Department of Energy's weatherization programs:

Figure 18: 2011-13 Funding for Weatherization Programs

Agency	Number of Weatherization Programs	2011-13 Funding (rounded)
Oregon Housing and Community		
Services Department	4	\$45,300,000
Oregon Department of Energy	1	800,000

Figure 19 depicts the weatherization programs at the Department and the SHOW program administered by ODOE (columns with multiple dots indicate areas of overlap).

Figure 19: Programs Providing Weatherization Services



Volunteer Programs

The Department administers Oregon Volunteers, which encompasses the Oregon Volunteers Commission Administration and three additional programs that serve to strengthen Oregon communities by increasing volunteerism. It also administers the Court Appointed Special Advocates (CASA) program that uses volunteers to advocate for abused and neglected children until they are placed in a safe, permanent home.

We did not find evidence of duplication among Department volunteer programs. However, overlap exists among the three Oregon Volunteers programs - the Volunteer Program, Civic Engagement Program and AmeriCorps – in program missions, for some services provided and targeted beneficiaries. The CASA program shows no overlap with the other volunteer programs.

We identified five other state agency administered programs that enlist volunteers:

Department of Human Services

- Senior Nutrition Program (Oregon Congregate and Home Delivered Nutrition Program)
- Volunteer Services Program

Office of the Long Term Care Ombudsman

Long Term Care Ombudsman Program

Department of Consumer and Business Services

Senior Health Insurance Benefits Assistance

Oregon Student Access Commission

Access to Student Assistance Programs in Reach of Everyone (ASPIRE)

We did not find evidence of fragmentation for volunteer programs. While the Department's Oregon Volunteers' programs focus is promote statewide volunteerism, the other state agency administered programs use volunteers to meet other goals. For example, the Department of Consumer and Business Services uses volunteers to educate, assist, and serve as advocates for people with Medicare.

We also did not find evidence of duplication between the Department's volunteer programs and other state agency programs. However, overlap exists between the Department's AmeriCorps program and the Oregon Student Access Commission's ASPIRE program, as both mentor students for education and career goals. No other overlap with state agency administered programs appears to exist, aside from the use of volunteers to deliver program services. The remaining four state agency administered volunteer programs have distinct services and beneficiaries. For example, the Office of Long Term Care Ombudsman trains volunteers to assist long term care facility residents through complaint investigation, resolution and advocacy for improvement in resident care.

Figure 20 shows the 2011-13 biennium funding for the Department and the other state agency volunteer programs:

Figure 20: 2011-13 Funding for Volunteer Programs

Agency	Number of Volunteer Programs	2011-13 Funding (rounded)
Oregon Housing and Community Services Department	5	\$ 7,400,000
Department of Human Services	2	19,400,000*
Office of the Long Term Care Ombudsman	1	2,300,000
Department of Consumer and		,,
Business Services	1	1,600,000
Oregon Student Access Commission	1	1,200,000

^{*}DHS Senior Nutrition Program, funded at \$15,900,000, includes a volunteer program component.

Recommendations

To improve the efficiency of service delivery, we recommend the Department of Housing and Community Services:

- Evaluate benefits and costs of reducing duplication, overlap and fragmentation among its programs.
- Work with other state agencies to evaluate benefits and costs of reducing duplication, overlap and fragmentation among similar programs.
- Where appropriate, include recommendations for consolidating or eliminating programs in its proposed plan for restructuring service delivery to be presented to the Governor and Legislature in February 2014.

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Objectives, Scope and Methodology

Our audit objective was to determine if duplication, overlap or fragmentation exists among Oregon Housing and Community Services Department (Department) administered programs and/or among these programs and similar programs administered by other state agencies.

Our review is based upon methods and definitions used by the U.S. Government Accountability Office (GAO) in analyses of federal programs. We used auditor judgment when determining whether duplication, overlap or fragmentation exists.

To accomplish our objective, we identified Department and other similar state agency administered programs. We developed a preliminary list of similar programs by using information from a variety of sources, including the Catalog of Federal Domestic Assistance, Oregon Revised Statutes, agency websites, and various agency documents. We confirmed a list of programs at the Department and identified other state agency administered programs with program missions or services similar to one or more of the Department's programs. We asked Department and other state agency program managers to confirm or correct the program information for their agency. Agencies provided each program's outcome measures and the total funding for the 2011-2013 biennium. Additionally, we asked agency program managers whether they knew of additional programs that might provide similar services.

Using the Department's and other state agencies' program information we conducted an analysis of the identified programs for duplication, overlap and fragmentation for each of the following program areas: Single Family Housing, Multi-Family Housing, Food Assistance, Energy and Weatherization Assistance, Homeless Programs, Rent Assistance, and Volunteer Programs.

To limit the scope of the audit, we did not review the Community Services program area separately as it includes only one program that can provide a wide range of services that address employment, education, housing, nutrition, emergency services and health. We also did not review Oregon Housing Stabilization Initiative or American Recovery and Reinvestment Act programs as these programs are temporary.

We conducted this performance audit in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objective. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objective.

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Housing and Community Services

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July 24, 2013

Kate Brown, Secretary of State c/o Gary Blackmer, Director, Audits Division 255 Capitol St. NE, Suite 500 Salem, OR 97310

Re: Oregon Housing and Community Services Program Audit Report

Dear Mr. Blackmer,

Oregon Housing and Community Services Department greatly appreciates the audit and believes that the information and results it contains will be invaluable to leadership's efforts to design and plan for new service delivery models.

Since rely,

Margaret S. Van Vliet

Director



About the Secretary of State Audits Division

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The courtesies and cooperation extended by officials and employees of the Oregon Housing and Community Services Department during the course of this audit were commendable and sincerely appreciated.