

February 5, 2026

BCC Agenda Date/Item: _____

Board of County Commissioners
Clackamas County

Approval of an Amendment to a Subrecipient Agreement with Legal Aid Services of Oregon for legal assistance to older adults and family caregivers. Amendment Value is \$107,179 for 1 year. Total Agreement Value is \$361,017 for 3 years. Funding is through the US Department of Housing and Urban Development. No County General Funds are involved.

Previous Board Action/Review	<ul style="list-style-type: none"> • Original agreement, June 5, 2024, signed by County Administrator • Amendment #01 November 7, 2024, Agenda Item 20241107 III.C.9 • Amendment #02 May 22, 2025, signed by County Administrator 		
Performance Clackamas	Safe, Secure, and Livable Communities		
Counsel Review	Yes - Sarah Foreman	Procurement Review	No
Contact Person	Tracy Garell	Contact Phone	503-655-8641

EXECUTIVE SUMMARY: The Social Services Division of the Health, Housing and Human Services request approval of Amendment #03 to a Subrecipient Agreement with Legal Aid Services of Oregon (LASO) to provide Housing Rights and Resources services funded by Community Development Block Grant (CDBG) funds and Legal Assistance services for older adults and family caregivers funded by Older Americans Act (OAA) for residents of the County. These services link residents with resources to meet their individual needs. Amendment #03 adds the FY26 budget to the existing agreement.

Total Agreement value increased to \$381,497 for three years. No County General Funds are involved.

RECOMMENDATION: Staff respectfully request that the Board of County Commissioners approve Amendment #03 (11260) and authorize Chair Roberts or his designee to sign on behalf of Clackamas County.

Respectfully submitted,

Mary Rumbaugh

Mary Rumbaugh
Director of Health, Housing & Human Services

For Filing Use Only

Subrecipient Amendment (FY24-27)
Clackamas County Department of Health, Housing and Human Services

Subrecipient Agreement Number: 24-009 Board Order Number: _____

Department/Division: H3S / Social Service Division Amendment No. 3

Subrecipient: Legal Aid Service of Oregon Amendment Requested By: Tracy Garell

Changes: ☐ Scope of Service ☒ Agreement Budget
☐ Agreement Time ☐ Other: _____

Justification for Amendment:

This Amendment #3 is entered into by and between Legal Aid Services of Oregon ("SUBRECIPIENT") and Clackamas County and shall become part of that federal subrecipient agreement ("Agreement") entered into by and between the parties on 6/5/2024. Amendment #3 adds the FY26 budget and results in an increase to the budget by an additional \$107,179, for a total Agreement amount of \$361,017.

This Amendment #3 is effective upon signature. Except as amended hereby, all other terms and conditions of the contract remain in full force and effect. The County has identified the changes with "***bold/italic***" font for easy reference.

AMEND Section 4, Grant Funds:

4. Grant Funds. COUNTY's funding for this Agreement is a combination of Federal dollars as specified below by title and Assistance Listing Number ("ALN") number as appropriate. The maximum, not to exceed, grant amount COUNTY will pay for two years is **\$253,838**. Payments will be made on a cost reimbursement basis, the award is conditional upon compliance with the terms herein, and disbursements will be made in accordance with the schedule and requirements contained in Exhibit D: Reimbursement Request. Failure to comply with the terms of this Agreement may result in withholding of payment.

4.1 Grant Funds: COUNTY's funding of \$104,280 in grant funds for this Agreement is the Older Americans Act (ALN: 93.044 & 93.052) issued to COUNTY by the State of Oregon, Department of Human Services ("ODHS"), Adults and People with Disabilities ("APD"), Community Services & Solutions Unit ("CSSU").

4.2 Other Funds: COUNTY's funding of \$149,558 in grant funds for this Agreement is the Community Development Block Grant for Entitlement Communities (ALN: 14.218) issued to COUNTY by the U.S. Department of Housing and Urban Development (HUD).

TO READ:

4. Grant Funds. COUNTY's funding for this Agreement is a combination of Federal dollars as specified below by title and Assistance Listing Number ("ALN") number as appropriate. The maximum, not to exceed, grant amount COUNTY will pay for ***three years is \$361,017***. Payments will be made on a cost reimbursement basis, the award is conditional upon compliance with the terms herein, and disbursements will be made in accordance with the schedule and requirements contained in Exhibit D: Reimbursement Request. Failure to comply with the terms of this Agreement may result in withholding of payment.

4.1 Grant Funds: COUNTY's funding of ***\$136,680*** in grant funds for this Agreement is the Older Americans Act (ALN: 93.044 & 93.052) issued to COUNTY by the State of Oregon, Department of Human Services ("ODHS"), Adults and People with Disabilities ("APD"), Community Services & Solutions Unit ("CSSU").

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4.2 Other Funds: COUNTY's funding of **\$224,337** in grant funds for this Agreement is the Community Development Block Grant for Entitlement Communities (ALN: 14.218) issued to COUNTY by the U.S. Department of Housing and Urban Development (HUD).

AMEND EXHIBIT B – SUBRECIPIENT Program Budget, to add the following additional budget for fiscal year 2025-26 with the following:

Legal Aid Services of Oregon

Fiscal Year 2026, 7/1/2025 - 6/30/2026

<u>Funding Category</u>	<u>AL Number</u>	<u>Max. Total Award</u>	<u>Required Match*</u>	<u>Services</u>	<u>Reimb. Rate</u>
OAA IIIB	93.044	\$ 29,400	\$ 3,269	Attorney Services	\$ 145.00
				Paralegal Services**	\$ 100.00
OAA IIIE	93.052	\$ 3,000	\$ 1,000	Attorney Services	\$ 145.00
				Paralegal Services**	\$ 100.00
CDBG	14.218	\$ 74,779	NA	Attorney Services	\$ 145.00
				Paralegal Services**	\$ 100.00
				Indirect cost recovery, federal de minimis rate of 15%	NA
Total		\$ 107,179	Federal Award Total:		\$ 107,179

* Source of Match - in-kind Admin Staff time

** Paralegal Services rate includes support staff and/or law clerks

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AMEND a portion of EXHIBIT D-1 – CDBG Required Reporting and Payment Request, Section 2 INVOICES:

2. INVOICES

Invoices shall include the following information: direct Housing Rights and Resources attorney hours broken out by time spent on referrals, intake, legal services, education, outreach, and training. At a minimum, requests shall be made quarterly for a lump sum not to exceed \$18,694.75. Invoices shall be sent electronically to: caainvoices@clackamas.us.

To READ:

2. INVOICES

Invoices shall include the following information: direct Housing Rights and Resources attorney hours **and paralegal hours (including support staff and law clerks)** broken out by time spent on referrals, intake, legal services, education, outreach, and training. At a minimum, requests shall be made quarterly. Invoices shall be sent electronically to: caainvoices@clackamas.us.

SUBRECIPIENT must submit at a minimum, quarterly reimbursement requests no later than 30 days after the close of the period. Each request must include:

(a) Dates of service for the period;

(b) Hours by individual (attorney, paralegal, support/law clerk) and by activity (referrals, intake, legal services, education, outreach, training), with hourly rates applied;

(c) Indirect cost request (allowed on CDBG portion only) as 15% of eligible attorney/paralegal/support staff/law clerks direct salaries and wages, consistent with Exhibits A and B to this agreement;

(d) Certification by an authorized official that costs are actual, allowable, and allocable to eligible CDBG services and not also charged to OAA or another funding source; and

(e) Supporting documentation, including timekeeping records, payroll registers or equivalent, and general ledger accounting detail sufficient for COUNTY review. COUNTY may request additional documentation to determine allowability (See 2 CFR 200.430(i) for personnel documentation standards).

(f) Certification. I certify to the best of my knowledge and belief that the information provided herein is true, complete, and accurate. I am aware that the provision of false, fictitious, or fraudulent information, or the omission of any material fact, may subject me to criminal, civil, or administrative consequences including, but not limited to violations of U.S. Code Title 18, Sections 2, 1001, 1343 and Title 31, Sections 3729-3730 and 3801-3812.

**AMEND EXHIBIT E General Administrative and Federal Terms & Conditions, Section 2
Administrative Requirements:**

h) Indirect Cost Recovery. Indirect cost recovery is statutorily unavailable for this award.

To READ:

h) Indirect Cost Recovery. Indirect cost recovery is statutorily unavailable for *the Older Americans Act portion of* this award (ALN 93.044 & 93.052). *SUBRECIPIENT chooses the federal de minimis rate of 15% of modified total direct costs (“MTDC”) for indirect cost recovery of the CDBG portion of this award (ALN 14.218).*

SUBRECIPIENT does not have a current federally negotiated indirect cost rate agreement (NICRA) and elects the de minimis rate of 15% of Modified Total Direct Costs (MTDC) for the CDBG portion only. MTDC for this award consists of all direct salaries and wages included in the hourly billable rates from the Housing Rights and Resources attorney hours and paralegal hours (including support staff and law clerks), as reflected in ‘Exhibit B - SUBRECIPIENT Program Budget’ for Fiscal Year 2026.

The Attorney (\$145/hr) and Paralegal (\$100/hr) billing rates are maximum reimbursable rates and must be supported by SUBRECIPIENT’s supporting documentation. County will reimburse actual, allowable, allocable costs only, not to exceed these ceilings. (No profit/fee is permitted under 2 CFR 200.400(g))

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REPLACE EXHIBIT H – 1 with the following:**2 CFR 200.332(a) REQUIRED INFORMATION**

Federal award identification	
SUBRECIPIENT Name:	Legal Aid Services of Oregon
SUBRECIPIENT Unique Entity Identifier:	NAZVQ89FQJ55
Federal Award Identification Number (FAIN):	Unavailable
Federal award date:	Unavailable
Subaward Period of Performance, Start and End Date:	7/1/2023 – 6/30/2027
Subaward Budget Period, Start and End Date:	7/1/2023 – 6/30/2026
Amount of federal funds obligated for this ALN by this action to SUBRECIPIENT:	\$124,680
Total amount of all Federal funds obligated in this subaward:	\$361,017
Total amount of all Federal funds obligated to SUBRECIPIENT during the current fiscal year:	\$107,179
Federal award program name:	Older Americans Act
Federal awarding agency:	Administration for Community Living
Name of pass-through entity:	Clackamas County
Assistance Listing Number (ALN) & Title:	93.044 Title III, Part B
Is Award for Research and Development?	No
SUBRECIPIENT indirect cost rate on this Agreement:	N/A

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REPLACE EXHIBIT H – 2 with the following:**2 CFR 200.332(a) REQUIRED INFORMATION**

Federal award identification	
SUBRECIPIENT Name:	Legal Aid Services of Oregon
SUBRECIPIENT Unique Entity Identifier:	NAZVQ89FQJ55
Federal Award Identification Number (FAIN):	Unavailable
Federal award date:	Unavailable
Subaward Period of Performance, Start and End Date:	7/1/2023 – 6/30/2027
Subaward Budget Period, Start and End Date:	7/1/2023 – 6/30/2026
Amount of federal funds obligated for this ALN by this action to SUBRECIPIENT:	\$12,000
Total amount of all Federal funds obligated in this subaward:	\$361,017
Total amount of all Federal funds obligated to SUBRECIPIENT during the current fiscal year:	\$107,179
Federal award program name:	Older Americans Act
Federal awarding agency:	Administration for Community Living
Name of pass-through entity:	Clackamas County
Is Award for Research and Development?	No
Assistance Listing Number (ALN) & Title:	93.052 Title III, Part E
SUBRECIPIENT indirect cost rate on this Agreement:	N/A

REPLACE EXHIBIT H – 3 with the following:

2 CFR 200.332(a) REQUIRED INFORMATION

Federal award identification	
SUBRECIPIENT Name:	Legal Aid Services of Oregon
SUBRECIPIENT Unique Entity Identifier:	NAZVQ89FQJ55
Federal Award Identification Number (FAIN):	B25UC410001
Federal award date:	12/5/2025
Subaward Period of Performance, Start and End Date:	7/1/2023 – 6/30/2027
Subaward Budget Period, Start and End Date:	7/1/2023 – 6/30/2026
Amount of federal funds obligated for this ALN by this action to SUBRECIPIENT:	\$224,337
Total amount of all Federal funds obligated in this subaward:	\$361,017
Total amount of all Federal funds obligated to SUBRECIPIENT during the current fiscal year:	\$107,179
Federal award program name:	Community Development Block Grant for Entitlement Communities
Federal awarding agency:	U.S. Department of Housing and Urban Development
Name of pass-through entity:	Clackamas County
Assistance Listing Number (ALN) & Title:	14.218
Is Award for Research and Development?	No
SUBRECIPIENT indirect cost rate on this Agreement:	<p><i>SUBRECIPIENT chooses the federal de minimis rate of 15% of modified total direct costs (“MTDC”) for indirect cost recovery.</i></p> <p><i>This is only applicable to the CDBG funds awarded from FAIN ‘B25UC410001’, for the budget period 7/1/2025 – 6/30/2026.</i></p>

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SIGNATURE PAGE

IN WITNESS WHEREOF, the parties hereto have caused this Amendment #3 to be executed by their duly authorized officers.

CLACKAMAS COUNTY

Legal Aid Services of Oregon

By: _____

By:  _____

Its: _____

Its: Interim Regional Director - Portland Regional Office

Dated: _____

Dated: 1/12/2026

Approved as to Legal Sufficiency:

By: *Sarah Foreman*
Sarah Foreman (Jan 12, 2026 15:24:43 PST)
County Counsel

Dated: Jan 12, 2026







24-009- A3 - FINAL - LASO_sub signed

Final Audit Report

2026-01-12

Created:	2026-01-12
By:	Bouavieng Bounnam (BBounnam@clackamas.us)
Status:	Signed
Transaction ID:	CBJCHBCAABAAL2gWUaHCzElgJ5GNu_lpuXtliMUKOwFb

"24-009- A3 - FINAL - LASO_sub signed" History

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-  Document emailed to sforeman@clackamas.us for signature
2026-01-12 - 11:19:14 PM GMT
-  Email viewed by sforeman@clackamas.us
2026-01-12 - 11:19:18 PM GMT- IP address: 52.44.135.122
-  Signer sforeman@clackamas.us entered name at signing as Sarah Foreman
2026-01-12 - 11:24:41 PM GMT- IP address: 75.231.210.179
-  Document e-signed by Sarah Foreman (sforeman@clackamas.us)
Signature Date: 2026-01-12 - 11:24:43 PM GMT - Time Source: server- IP address: 75.231.210.179
-  Agreement completed.
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