



HOMELESS HOUSING PROGRAM POLICY AND OPERATIONS MANUAL

CHAPTER 2: PREVENTION

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CHAPTER 2: PREVENTION

2.1 OVERVIEW

2.1.1 DEFINITION

The Prevention component of the Homeless Crisis Response System (HCRS), also referenced as Targeted Prevention or Homelessness Prevention, includes activities that target assistance to individuals and families to avert experiences of homelessness. The types of assistance provided through Prevention can include:

- Housing-focused case management
- Housing relocation or stabilization services, including counseling or legal assistance
- Short- and/or medium-term rental or housing-related financial assistance

To be most effective and efficient, Prevention services are targeted towards individuals and families who are at greatest risk of losing their housing and entering Emergency Shelter or unsheltered locations.

Additionally for service providers utilizing CHG funding, programs must use an evidenced-based process to prioritize households most likely to become homeless, suffer severe mental health consequences after eviction, and those disproportionately impacted by housing instability.

2.1.2 GOALS AND OBJECTIVES

Prevention programs expand upon The Road Home Continuum of Care (CoC)'s efforts to make homelessness rare, brief, and non-recurring. The Road Home's Prevention efforts aim to achieve the following goals:

- Prevent evictions
- Target limited resources to people most likely to become homeless after eviction

Homelessness Prevention is not the sole responsibility of the CoC and requires a multi-sector approach and focus on reducing the prevalence of housing crises. This multi-sector approach includes addressing systemic racial inequities, ensuring an adequate affordable housing supply, promoting stable transitions from institutions and systems of care, and providing meaningful and equitable access to jobs, income, childcare, education, and other resources.

2.1.3 PARTICIPATION IN COORDINATED ENTRY

When persons or households contact Coordinated Entry (CE), they are screened for eligibility for the HCRS; should a person or household be at-risk of homelessness, they may be referred to available Prevention services. Prevention efforts aim to resolve an individual's or family's housing crisis before it results in homelessness and the need for CE resources.

For Emergency Solution Grant Homelessness Prevention Assistance service providers, eligibility for assistance may be evaluated by service providers rather than by Coordinated Entry, as long as it in

accordance with federal assessment requirements ([24 CFR 576.400\(d\)](#)) and written standards ([24 CFR 576.400\(e\)](#)).

For Consolidated Homeless Grant Prevention Assistance service providers, projects must participate in Coordinated Entry by accepting referrals and filling opening exclusively through the CE process.

2.1.4 FUNDING SOURCES REFERENCED IN THIS CHAPTER

Fund sources referenced in this chapter of the Manual include:

- Emergency Solutions Grant (ESG), including both:
 - State Allocation (ESG – State)
 - County Allocation (ESG – County)
- Tacoma Housing Authority (THA)
- Consolidated Homeless Grant (CHG), which may include:
 - CHG-Chronically Homeless Families (CHG-CHF)
 - CHG-Inflation
 - CHG-Emergency Housing Fund (CHG-EHF)
 - Consolidated Homeless Grant Housing and Essential Needs (CHG-HEN)
- Homeless Document Recording Fee (DRF), including:
 - CHG-DRF Relief

If these policies should conflict with guidance provided by the US Department of Housing and Urban Development or the WA State Department of Commerce, then such guidance shall supersede these policies.

2.2 ELIGIBILITY AND TYPICAL SERVICE FLOW

2.2.1 ELIGIBILITY REQUIREMENTS: FOR PROGRAM ENTRY

2.2.1.1 STANDARD ELIGIBILITY: APPLICABLE TO ALL FUNDING SOURCES

To be eligible for Prevention resources, households must meet the following conditions:

1. Households must be at-risk of homelessness. Eligibility varies dependent on the definition according to the specific fund source. See Additional Eligibility Requirements Specific to Funding Source below.
2. Households may need to meet an Income Standard. Eligibility varies dependent on fund source. Please see Additional Eligibility Requirements Specific to Funding Source below.
3. Households must reside in Pierce County. Eligibility may be further restricted, dependent on the fund source. See Additional Eligibility Requirements Specific to Funding Source below.

2.2.1.2 ADDITIONAL ELIGIBILITY: REQUIREMENTS SPECIFIC TO FUNDING SOURCE

Additional eligibility criteria may apply based on funding source. In instances where service providers use multiple sources of funding for the same household, service providers must comply with the more stringent of the requirements.

Eligibility Guidelines	
Funding Source	Definition of At Risk
CHG or CHG-HEN	<p><u>In addition to</u> the Standard Eligibility Requirements above, the following definition applies for CHG-funded Prevention programs and must be documented using the <i>CHG Verification of Household Eligibility and Income Recertification Form (Appendix C-2)</i>. Households are at risk of homelessness if they meet one of the following conditions:</p> <ul style="list-style-type: none">• Have a missed rent payment and currently owe all or part of a rent payment (current month or past months); OR• Has moved because of economic reasons 2 or more times during the 60 days immediately preceding the application for assistance; OR• Is living in the home of another because of economic hardship; OR• Has been notified that their right to occupy their current housing or living situation will be terminated within 21 days after the date of application for assistance; OR• Lives in a hotel/motel and the cost is not paid for by charitable organizations or by Federal, State, or local government programs for low-income individuals; OR• Lives in an SRO or efficiency apartment unit in which there reside more than 2 persons or lives in a larger housing unit in which there reside more than one and a half persons per room; OR

	<ul style="list-style-type: none"> Is exiting a publicly funded institution or system of care.
ESG, DRF, and THA	<p><u>In addition to</u> the Standard Eligibility Requirements above, the following requirements apply for ESG-, DRF-, and THA-funded Prevention programs:</p> <ul style="list-style-type: none"> Individuals and families in Homeless definition Categories 2 or 4 who are not literally homeless or individuals and families in At-Risk of Homelessness Definition Criteria 1, 2 and 3¹. <p>For ESG, utilize the <i>ESG Verification of Eligibility – Prevention form (Appendix C-11)</i>.</p>

Funding Source	Income Criteria
CHG	<p><u>In addition to</u> the Standard Eligibility Requirements above, the following requirements apply for CHG-funded Prevention programs and must be documented using the <i>CHG Verification of Household Eligibility and Income Recertification Form (Appendix C-2)</i>.</p> <ul style="list-style-type: none"> Households eligible for Prevention funded with CHG Standard-funding must meet income requirements of at or below 50% Area Median Income.
CHG-HEN	<p><u>In addition to</u> the Standard Eligibility Requirements above, the following requirements apply for CHG-funded Prevention programs and must be documented using the <i>CHG Verification of Household Eligibility and Income Recertification Form (Appendix C-2)</i>.</p> <ul style="list-style-type: none"> Households eligible for HEN-funded Prevention resources must have a HEN Referral².
ESG	<p><u>In addition to</u> the Standard Eligibility Requirements above, the following requirements apply for ESG-funded Prevention programs and must be documented using the <i>ESG Verification of Eligibility Form (Appendix C-11)</i>:</p> <ul style="list-style-type: none"> Household annual income must be below 30% Area Median Income (AMI) Household lacks sufficient resources and support networks necessary to retain housing without ESG assistance
DRF and THA	<p><u>In addition to</u> the Standard Eligibility Requirements above, the following requirements apply for DRF- and THA-funded Prevention programs:</p>

¹ Additional information on HUD's Homeless and At Risk of Homelessness Definitions may be found in Appendix A-2 and A-3, respectively.

² HEN Referral includes households who have a HEN Referral and households enrolled in General Assistance (ABD recipient) and General Assistance Pregnancy (Pregnant Women Assistance recipient) from the Washington State Department of Social and Health Services (DSHS) as documented in the Benefits Verification System (BVS).

	<ul style="list-style-type: none"> Household annual income must be below 50% Area Median Income (AMI)
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Funding Source	Residency Criteria
CHG, CHG-HEN, ESG, and DRF	Pierce County
THA	Must reside in THA's catchment area (see Appendix B-4). This criterion can be waived if the household has a student enrolled in a school within the Tacoma School District.

2.2.2 ELIGIBILITY RE-CERTIFICATION: REQUIREMENTS FOR ENROLLED HOUSEHOLDS

2.2.2.1 ELIGIBILITY RE-CERTIFICATION: OVERVIEW

Once enrolled in the program, households must continue to meet recertification eligibility criteria at intervals set by the funding source. In instances where service providers use multiple sources of funding for the same household, service providers must comply with the more stringent of the requirements.

2.2.2.2 ELIGIBILITY RE-CERTIFICATION REQUIREMENTS: SPECIFIC TO FUNDING SOURCE

Funding Source	Eligibility Guidelines
CHG or CHG-HEN	<p>Following the first 90 days of a household's program participation, CHG Standard-funded programs must assess each household for income eligibility at least every three months.</p> <p>To remain eligible at re-certification:</p> <ol style="list-style-type: none"> CHG Standard: Household income must be at or below 50% Area Median Income. CHG-HEN: Households must have a HEN referral or be enrolled in General Assistance Aging, Blind, or Disabled Program (ABD recipient) or General Assistance Pregnancy Program (Pregnant Women Assistance recipient) through the Washington State Department of Social and Health Services. <p>Eligibility must be documented using the <i>CHG Verification of Household Eligibility and Income Recertification Form (Appendix C-2)</i>. For CHG-HEN, documentation of eligibility must be verified via the Benefits Verification System.</p>
ESG, THA, or DRF	<p>For ESG, THA or DRF funded programs, households must be assessed for income eligibility at least every three months as part of required re-certification process.</p> <p>For ESG, in addition to meeting the income criteria, the re-certification or re-evaluation must establish that the participant lacks sufficient resources and support networks necessary to retain housing without ESG assistance. See Appendix C-13 for the <i>ESG Verification of Eligibility for Re-Certification Form</i>.</p>

2.2.2.3 ELIGIBILITY RE-CERTIFICATION: INELIGIBILITY DETERMINATIONS

CHG-FUNDED ASSISTANCE

If households are determined income ineligible, they may remain in the program for an additional three months. Case management may continue for an additional six months after the determination of income ineligibility to support the household's transition to self-sufficiency.

ESG-, THA-, and DRF-FUNDED ASSISTANCE

If households are determined income ineligible at recertification, the household is no longer eligible for assistance. See **Section 2.3.5.1** regarding Termination of Assistance policy.

2.2.3 PRIORITIZATION

Service providers should utilize evidence-based processes to identify and prioritize households that are most likely to become homeless without Prevention assistance.

CHG-Funded Prevention programs must utilize the *Consolidated Homeless Grant Targeted Prevention Eligibility Screening Form* (See Appendix C-7) which determines eligibility based on a combination of factors that include household income, re-housing challenge factors, and high risk of homelessness factors.

2.2.4 TYPICAL SERVICE FLOW

When persons or households first contact CE, staff conduct Screening activities to determine if a household is literally homeless or fleeing domestic violence and qualifies for assistance through the HCRS. **Chapter 3: Coordinated Entry** provides an in-depth overview of the policies and procedures that guide Pierce County's Coordinated Entry System. Households who do not qualify for assistance through the CE system should be referred to appropriate resources outside of the HCRS. Households in need of Prevention services will receive information about available resources, which are very limited in the CoC.

Process Step	Process Detail
Referrals and Eligibility Verification	<ol style="list-style-type: none">1. Households are referred to Prevention providers, who must verify household meets eligibility requirements as outlined in this Chapter and in accordance with program funding.2. Initial screening may be completed by phone or in person: however, documentation verifying eligibility must be collected prior to program enrollment or approval of rental assistance.
Data Collection / Program Enrollment	<ol style="list-style-type: none">1. Program staff will collect documentation from household verifying eligibility and, if eligible, enroll the household into the Prevention program in HMIS.
Housing Stability Plan Development	<ol style="list-style-type: none">1. Create Housing Stability Plan: Program staff will work with the household to outline the steps that will be taken to prevent eviction and/or loss of housing. Prevention staff creates a hard copy file for the participant. This must include, at a minimum:<ol style="list-style-type: none">a. Housing Goals: Concrete plan and action steps for retaining housing. This may include but is not limited to

	<p>mediation, legal services connections, and/or problem solving.</p> <p>b. Linkages to Mainstream Resources: Goal and action steps related to obtaining all public/ mainstream benefits to which the participant is entitled and interested. This may include linkages to needed physical, mental and/or behavioral health services and supports.</p>
Follow Up	<ol style="list-style-type: none"> 1. Program staff will work with the household to complete the agreed upon Housing Stability Plan. This may include coordination with landlords, mediation, referrals to community-based services, and/or meetings with the household to review and assist with their plan action steps.
Re-Certifications	<ol style="list-style-type: none"> 1. Recertifications of income eligibility and the types and amounts of participant assistance must be completed every three months.
Program Exit	<ol style="list-style-type: none"> 1. Upon exit from the Prevention program, staff will close out all agency paperwork according to agency procedures and exit the household from the Prevention program in HMIS.

2.3 POLICIES AND STANDARDS

2.3.1 FEDERAL, STATE, AND LOCAL REGULATIONS

Prevention programs are governed by an array of federal, state, and local regulations. Service providers should reference applicable regulations included in **Chapter 1.3 - Universal Policies and Standards**. This is not an exhaustive list; it is the responsibility of each individual service provider to ensure they are in compliance with all applicable federal, state, and local regulations. In instances where regulations overlap, service providers must comply with the more stringent of the applicable regulations.

2.3.1.1 PROGRAM REQUIREMENTS FOR PROJECTS FUNDED WITH CHG

LANDLORD ACCESSIBILITY

Landlords must be allowed to initiate a request for assistance on behalf of their tenants. Eligibility is based on tenant eligibility.

At minimum, a reasonable attempt to contact the tenant must be made using the information provided from the landlord. A process must be created for what is reasonable based on the agency and staffing capacity. If a tenant is unresponsive, ineligible, or eligibility cannot be determined, assistance must be denied.

PARTNERING WITH THE CENTER FOR DIALOG AND RESOLUTION

CHG funded service providers utilizing funding for Rental Assistance activities must coordinate with the Center for Dialog and Resolution, as they can be an important pathway to prevent evictions and providing rent assistance can be critical to settling disputes.

2.3.2 HOUSING UNIT APPROVAL

Prevention programs may provide assistance to help participants regain stability in the participant's current permanent housing or move into other permanent housing to achieve stability, provided that the unit meets the habitability standards described in Section 2.3.2.1.

2.3.2.1 STANDARD REQUIREMENTS FOR DETERMINING UNIT HABITABILITY

Service providers must verify and document the habitability of all housing units into which a participant will be moving prior to paying any move-in or rental subsidies. Programs must comply with HUD's Housing Quality Standards (HQS) for habitability determinations. An HQS Pre-Inspection Checklist is included in the Appendix for reference (See Appendix B-2). Complete records of inspections and follow-up actions must be maintained in the participant file.

PROCESS TO VERIFY HOUSING QUALITY STANDARDS

In Pierce County, all HQS inspections are completed by Pierce County Human Services. Inspections less than 12 months old performed by the Housing Authority can be used. For units that require HQS inspection, staff can request an HQS inspection by visiting the Pierce County Human Services website at <https://www.piercecountywa.gov/4804/Housing-Quality-Standards-Inspections-HQ>. In advance of the inspection, the service provider must provide a copy of the inspection form to the landlord at least five days in advance of the scheduled appointment.

HOUSING UNIT SIZE

In alignment with HUD HQS, each participating household must have the bedroom size that fits their household size. For example, two adults in a shared housing situation must have their own lease, and their own bedroom. Two adults may share one bedroom if they present together as a household. However, if the unit has a Housing Authority-issued voucher attached to it, service providers must seek approval from the Housing Authority to approve multiple adults for a single room or Single Room Occupancy unit.

EXCEPTION: SPECIFIC TO CHG FUNDING SOURCE

Documented habitability is not required in CHG-funded programs in instances in which a participant will be moving in with friends or family.

2.3.2.2 UNIT HABITABILITY COMPLAINT PROCEDURES

Participants must be informed in writing of the habitability complaint process and assured that complaints regarding their housing unit's safety and habitability will not affect the household's eligibility for assistance. Service provider must have a written procedure describing the response to complaints regarding unit safety and habitability that includes mandatory inspection when a complaint is reported. Inspection should be documented using the HQS Inspection Form or an alternative format that documents the specific complaint, follow-up, and resolution.

2.3.2.3 HOUSING UNIT SIZE

Units must meet size requirements based on household size and composition and rent reasonableness based on Occupancy Standards. Occupancy Standards refer to the guidelines set by a RRH program governing the number of bedrooms allowed for households of different sizes and composition. Service providers have some flexibility in developing these standards as long as the standards do not violate fair housing requirements and comply with Federal, State, and local fair housing and civil rights laws. The primary intent when developing occupancy standards for the rental program is to provide for the smallest number of bedrooms needed by a household without overcrowding. It is acceptable to make allowances for special needs or circumstances, but the standards developed by the service provider must be applied equally and fairly to all participants.

2.3.2.4 RENT REASONABLENESS AND COMPLIANCE WITH FAIR MARKET RENT

Service providers must comply with Pierce County's rent limit policies for rental assistance and perform a rent reasonableness determination.

RENT LIMIT

Service providers must comply with Pierce County's rent limit policy for rental assistance, which varies by funding source. HUD sets geographically specific Fair Market Rent (FMR) limits annually for the housing costs of units, including both rent and utilities. Utilities include electricity, fuel (e.g., natural gas, oil), water, sewer, and trash removal, if trash is included in the water/sewage bill for that area OR if it is included in the rent for all tenants. Otherwise, if trash-removal is a stand-alone bill, it is not eligible. Telephone, internet, and cable are not eligible utilities.

For ESG-funded programs, service providers must determine and document that rent falls at or below the FMR on every unit assisted; the FMR is the maximum rent permitted even if other similar units rent

for more. However, for CHG-, THA-, and DRF-funded programs, if the program can document that the unit is Rent Reasonable and under 120% of FMR, then FMR may be exceeded. If any funds are used towards the difference between the FMR and the rental cost, those funds cannot be used towards the HUD CoC match as they are not HUD CoC eligible costs.

RENT REASONABLENESS

The Rent Reasonableness standard is designed to ensure that rents being paid are reasonable in relation to rents being charged for comparable units in the same market. To make this determination, service providers should consider: the location, quality, size, type, and age of the unit, and any amenities, housing services, maintenance, and utilities to be provided.

To calculate the gross rent for purposes of determining whether it meets the Rent Reasonableness standard, consider the entire housing cost: rent plus the cost of any utilities that must, according to the lease, be the responsibility of the tenant. Utility costs may include gas, electric, water, sewer, and trash. However, telephone, cable or satellite television service, and internet service should be excluded. The gross rent also does not include pet fees or late fees that the participant may accrue for failing to pay the rent by the due date established in the lease.

Note that not every element in the suggested list of nine things to check for must be known to establish a comparable unit. Service providers should use the *Rent Reasonableness Checklist and Certification Form* for documentation (See Appendix B-3); alternate forms may be utilized if approved in advance by Pierce County. At least three comparable units must be documented to demonstrate Rent Reasonableness.

Service providers, regardless of fund source, must document that the unit complies with HUD's standards of Rent Reasonableness³.

2.3.3 RENTAL PAYMENTS

2.3.3.1 PARTICIPANT LEASE & DOCUMENTATION REQUIREMENTS

A written and legally binding lease is required when rental assistance will be paid to a landlord on a participant's behalf. The lease must be established between the participant and the landlord/owner.

Based on the funding source and Rental Assistance provided, alternate documentation may be acceptable in lieu of a lease, based on the criteria in the table below.

Funding Source	Type of Assistance	Allowable Documentation
CHG	Move-In Costs Only (i.e., security deposits, first and last month rent)	Intent to Rent documentation
	Rental Payments to Friend or Family Member Not in Business of Property Management	Certification of Payment Obligation: In these instances, CHG requires use of <i>CHG Certification of Payment Obligation/Potential Eviction from Friend or Family Form</i> (See Appendix C-8).

³ According to [24 CFR 982.507 \(b\)](#). See Appendix B-3 and <https://www.hudexchange.info/resource/4424/coc-rent-reasonableness-and-fair-market-rent/> for more information on documenting Rent Reasonableness.

ESG	Rental Arrears Only	Oral Agreement: If rental assistance is for rental arrears only, Oral Agreement with the landlord/owner is acceptable. In these instances, oral agreement must give the participant an enforceable leasehold interest under state law and the agreement and rent owed must be sufficiently documented by the owner's financial records, rent ledgers, or canceled checks.
	Move-In Costs Only (i.e., security deposits, first and last month rent)	Intent to Rent documentation
	Rental Payments to Friend or Family Member Not in Business of Property Management	Certification of Payment Obligation: In these instances, use of <i>CHG Certification of Payment Obligation/Potential Eviction from Friend or Family Form</i> (See Appendix C-8 is acceptable.
DRF and THA	Rental Arrears Only	Oral Agreement: If rental assistance is for rental arrears only, Oral Agreement with the landlord/owner is acceptable. In these instances, oral agreement must give the participant an enforceable leasehold interest under state law and the agreement and rent owed must be sufficiently documented by the owner's financial records, rent ledgers, or canceled checks.

2.3.3.2 AGENCY RENTAL ASSISTANCE AGREEMENT REQUIREMENT – ESG ONLY

The service provider may only make Rental Assistance payments to an owner with whom the service provider has entered into a Rental Assistance Agreement. Service providers utilizing ESG-funding must develop and enter into a Rental Assistance Agreement with participants and the owner(s) of housing to which they will move in to. The Rental Assistance Agreement must include:

1. Terms under which rental assistance will be provided.
2. Payment dates, grace period, and late payment penalties; must be the same as terms in the participant's lease.
3. Requirement that owners provide RRH service provider with a copy of any notice to the participant to vacate the unit or any complaint used under State or local law to commence an eviction action against the participant. Please see <https://www.hudexchange.info/news/snaps-shots-requirements-for-rental-assistance-agreements-and-leases-under-the-emergency-solutions-grants-esg-program/> for additional guidance on Rental Assistance Agreements. See Appendix B-5 for a Rental Assistance Agreement Sample.
4. All protections that apply to tenants and applicants under [24 CFR Part 5, Subpart L](#) as supplemented by [§576.409](#), except for the emergency transfer plan requirements under [24 CFR 5.2005\(e\)](#) and [576.409\(d\)](#). If the housing is not assisted under another "covered housing program," as defined in [24 CFR 5.2003](#), the agreement may provide that the owner's obligations

under [24 CFR Part 5, Subpart L](#) (Protection for Victims of Domestic Violence, Dating Violence, Sexual Assault, or Stalking), expire at the end of the rental assistance period.

2.3.3.3 LATE PAYMENTS

The service provider must make timely payments to each owner in accordance with the participant's lease and (if using ESG-funds) the Rental Assistance Agreement. Service providers may NOT pay rental assistance late fees with ESG or THA funds. CHG and DRF funds may only be used to pay late fees in the following circumstances:

- The participant has incurred the late fee
- Delivery of the rent payment was delayed in an unpreventable manner (i.e., lost in mail)
- Other circumstances approved by the County in advance

Late fees incurred by the service provider due to preventable circumstances will not be reimbursable.

2.3.3.4 PARTICIPANT CONTRIBUTIONS TO HOUSING COSTS

The standards below apply to determining the participant's share of rent and utilities. Although each household may receive a different amount of rent subsidy in consideration of the household's resources and expenses, the procedure for determining the subsidy must be standardized.

- Rental assistance is to be individualized and based on participant need.
- Service providers must work with their participants to determine an individualized amount that each household will contribute toward their monthly rent cost and utilities based on their income. After the first month, participants are required to contribute at least 30% of their income to their rent each month. In instances in which a participant has no income, their 30% contribution will be \$0. This amount needs to be clearly documented and includes a utility allowance if they pay for utilities directly. The actual contribution will be determined monthly, based on each household's specific situation and financial resources.
- Service provider staff will help households obtain outside utility assistance if they are unable to pay for the utilities themselves (i.e., no income). In rare cases where the household is unable to locate other utility assistance, funds can be used if the household demonstrates a clear need for assistance (i.e., utility shut-off notice, monthly budget indicating the inability to pay utilities, etc., and a list of community resources they attempted to obtain) and the service provider staff supports providing utility assistance. If funds are used towards utilities, the payment should take into consideration the previous utility allowance given to the household in the participant contribution calculation for rent.

HEN HOUSEHOLDS

HEN households cannot be required to pay any of their Aging, Blind, Disabled (ABD) cash benefit or other earned income reported to DSHS towards their rent.

ARREARS

Rent and utility arrear payments should be individualized and based on participant need. If a household is more than two months in utility arrears, service provider staff should attempt to negotiate a payment plan and/or identify other community resources to assist the household. Limits to rent and utility arrears

vary based upon funding source. Please see Section 2.5 for more detailed information on each fund source and its limits.

PARTICIPANT CONTRIBUTIONS TO HOUSING RELOCATION ASSISTANCE

The level of financial support should be based on the income and need of the household as well as their ability to contribute to the cost of relocation. Financial assistance may cover up to 100% of eligible move-in costs for Prevention participants who are relocating. This includes application fees, security deposit, last month's rent, utility deposit, and up to six months of utility arrears. If a household is more than two months in arrears, service provider staff should attempt to negotiate a payment plan and/or identify other community resources to assist the household.

2.3.3.5 LENGTH OF RENTAL ASSISTANCE

The duration of rental assistance should be responsive to the individual needs of the participant. Standard prevention services in Pierce County are up to six months, with the intention that progressive engagement is utilized so that participants are enrolled only so long as the services are needed to gain housing stability.

On a case-by-case basis, service providers may request an extension in services, up to a maximum of 24 months. Requests must be made in writing to Pierce County using approved forms (See Appendix C-9). While a household does not need to have a qualifier in order to continue receiving prevention assistance after six months, service providers are encouraged to work with households to graduate them off of the program or clearly identify a qualifying need for continuance.

2.3.4 PROGRAM CASE MANAGEMENT AND RELATED SERVICES POLICIES

2.3.4.1 HOUSING STABILITY CASE MANAGEMENT SERVICE PARTICIPATION

STANDARD REQUIREMENTS: APPLICABLE TO ALL FUNDING SOURCES

Prevention programs are required to offer regular, ongoing case management services to assist participants in maintaining long-term housing stability. Within this framework, the frequency of meetings and type of assistance provided by the case manager will be tailored to the specific needs of the participant.

Housing stability case management consists of:

- Conducting initial evaluation to verify and document eligibility for Prevention
- Developing an individualized housing and service plan (e.g., Housing Stability Plan)
- Counseling
- Developing, securing, and coordinating services and obtaining Federal, State, and local benefits
- Monitoring and evaluating participant progress
- Providing information and referrals to other providers
- Conducting required re-evaluations

ADDITIONAL REQUIREMENTS: SPECIFIC TO ESG-FUNDED PROGRAMS

Participants in Prevention programs are required to meet with a case manager not less than once per month to assist the participant in maintaining long-term housing stability. Programs are required to make multiple meaningful attempts to offer this service each month.

While programs must not terminate or deny services to households based on refusal to participate in supportive services, supportive services do not include housing stability planning or case management. Supportive services are helping or educational resources that include support groups, mental health services, alcohol and substance abuse services, life skills or independent living skills services, vocational services, and social activities.

Households in ESG-funded programs are exempt from this case management requirement if the Violence Against Women Act of 1994 (42 U.S.C. 13701 *et seq.*) or the Family Violence Prevention and Services Act (42 U.S.C. 10401 *et seq.*) prohibits the service provider from making its Emergency Shelter or housing conditional on the participant's acceptance of services.

2.3.4.2 LENGTH OF HOUSING STABILITY CASE MANAGEMENT ASSISTANCE

The duration of Housing Stability Case Management assistance should be responsive to the individual needs of the participant. Standard services in Pierce County mimic the length of Rental Assistance provision, with the intention that Progressive Engagement is utilized so that participants are enrolled only so long as the services are needed to gain housing stability. However, it is not required that Housing Stability Case Management services end when Rental Assistance ends; services may continue after Rental Assistance ends. The maximum length of service is 24 months.

HOUSING CASE MANAGEMENT TIME LIMIT POLICY: SPECIFIC TO ESG-FUNDED SERVICES

ESG distinguishes Housing Search and Placement⁴ services from Housing Stability Case Management⁵ services. Housing Stability Case Management may be provided to assist a participant to overcome immediate barriers to obtaining housing prior to their move-in to a unit through Prevention assistance. Under ESG, Housing Stability Case Management assistance *prior to participant move-in* to permanent housing cannot exceed 30 days. Once the participant is living in permanent housing (e.g., while enrolled in Prevention), Housing Stability Case Management services cannot exceed 24 months during any 3-year period.

2.3.4.3 APPLICATION OF PROGRESSIVE ENGAGEMENT TO CASE MANAGEMENT SERVICES

Included below are examples of allowable ways in which the level of service and support in Prevention programs can be adjusted in alignment with Progressive Engagement to better match participant needs.

ADJUST FREQUENCY OF CASE MANAGEMENT MEETINGS

While the basic program requirement is that Prevention staff meet with participants at least once per month, staff may determine that a participant needs more frequent meetings in order to accomplish goals. Possible indications of need to increase case management frequency:

- Participant acuity demonstrates high barriers to obtaining housing, particularly in areas such as tenancy, mental health and wellness, or history of homelessness.

⁴ Housing Search and Placement includes assessment of housing barriers, needs, and preferences; development of an action plan for locating housing; housing search; outreach to and negotiation with owners; assistance with submitting rental applications and understanding leases; assessment of housing for compliance with ESG requirements for habitability, lead-based paint, and rent reasonableness; assistance in obtaining utilities and making moving arrangements; and tenant counseling.

⁵ Housing Stability Case Management includes assessing, arranging, coordinating, and monitoring the delivery of individualized services to facilitate housing stability for a participant who resides in permanent housing (including Prevention) or to assist a participant in overcoming immediate barriers to obtaining housing.

- Participant has cognitive, developmental, or behavioral issues that have or may prevent them from accomplishing tasks or daily living activities.
- Participant has drug or alcohol use behaviors that may limit memory or ability to complete tasks.

In response, programs may elect to:

- Increase the number of in-person and/or phone meetings to more than once per month, such as biweekly or weekly.
- Engage additional supportive services, such as Critical Time Intervention staff, to help the participant achieve goals. Hold joint meetings so that all supports are aware of action steps and goals and ensure that these supports are assisting in completion of goals.
- Provide text message reminders or other prompts to complete tasks such as payment of rent or other bills.

INCREASE SUPPORTIVE SERVICES

Some participants may need additional support in achieving housing goals or support in achieving other goals from other community support resources. Possible indications of need to increase supportive services include:

- Participant acuity demonstrates high barriers in certain areas needing professional services, support, or care, such as mental and physical health and wellness, trauma/ abuse, family, etc.
- Participant's lack of history or ability with certain skills, such as employment, tenancy, financial literacy.
- Significant barriers to obtaining housing identified such as evictions, criminal history, etc.

In response, programs may elect to:

- Make referral to non-housing supportive services and follow up with referral to ensure that participant is able to access these services. Hold joint meetings to ensure that all supportive services are in place, all providers understand service goals, and support is being provided to help participant achieve goals.

ADJUST HOUSING STABILITY PLAN

Some participants may need to break goals down into smaller action steps for plans to be manageable. Possible indications of a need to adjust Housing Stability Plans include:

- Participant is unable to complete tasks as agreed upon or is unable to make progress on goals.
- Participant has not completed similar tasks before and is unsure of how to start.

In response, programs may elect to:

- Engage other support service professionals in creating an appropriate Housing Stability Plan for participant based on abilities.
- Break tasks down into smaller actions and ensure case management support for each action.
- Check in more regularly on progress towards achieving goals.

Participants should be provided the level and type of service and supports necessary to achieve housing stability, as soon as that level of need is identified. For example, if a higher level of support is identified

from intake, then that level of support should be provided immediately. If needs exceed the capacity or training of staff, service providers must refer and connect participants to appropriate supports.

2.3.5 PROGRAM EXIT

Households should be exited from the program when: 1) they are no longer eligible for or in need of services, 2) they have completed all goals as outlined in the Housing Stability Plan, 3) they have financial ability to meet basic living needs, or 4) violation of a Program Agreement is discovered. Participant households should not be exited from the program for lack of stability. In all cases of exiting the program (voluntarily or involuntarily), staff must provide written communication to the both the household and the landlord, as well as inform any other partner staff with whom the household is currently working. Providers must have a Termination of Assistance procedure that adheres to the policy below.

2.3.5.1 TERMINATION OF ASSISTANCE

Service providers must have a written program termination policy that describes the reasons a household may be terminated from participation, the notification process, and assurance the household will be made aware of the grievance process. To terminate rental assistance or housing stabilization services, the process, at a minimum, must:

- Provide written notice to the participant with a clear statement of the reasons for termination
- An opportunity for the participant to present written or oral objections before a person other than the person (or subordinate of the that person) who made or approved the termination decision; and,
- Prompt written notice of the final decision to the participant.

If a participant violates program requirements, the service provider may terminate assistance in accordance with the formal process established through the policy. Service providers must exercise judgment and examine all extenuating circumstances in determining when violations warrant termination so that a participant's assistance is terminated only in the most severe cases. Program termination does not bar programs from providing further assistance at a later date to the same household.

Note that program participation and rent tenancy are separate processes. For example, a participant may have their lease terminated but still be eligible for services and to look for new housing or a participant may be ineligible for services but still have their lease in-tact with full responsibility for rent payment.

2.4 PERFORMANCE MEASUREMENT

2.4.1 DATA COLLECTION AND DOCUMENTATION REQUIREMENTS

2.4.1.1 STANDARD HMIS DOCUMENTATION REQUIREMENTS

HMIS Entry and Exit Data Collection Requirements
<ul style="list-style-type: none">• HMIS Client Profile / Basic Information• HMIS Program Entry• Type of Service Provided• Financial Assistance Provided: date financial assistance was provided; type of financial assistance provided; source of financial assistance; and dollar amount provided• HMIS Program Exit

2.4.1.2 ADDITIONAL DOCUMENTATION REQUIREMENTS

Agencies must verify and document eligibility prior to project entry. Verification of household eligibility must be kept in the participant file. Documentation must be dated within 30 days of project entry. Documentation requirements are detailed in the table below. Third-Party source documentation should always be sought first. If it cannot be obtained, Third-Party Written or Oral Verification should be sought (with a preference for written documentation). If neither can be obtained, then efforts to collect all types of Third-Party documentation should be recorded and Self-Certification shall be obtained from the participant and kept in the Participant File. See Appendix C-4 and C-5 for sample forms.

Documentation Requirement Details for Enrollment
All Prevention Programs
At Risk of Homelessness Status
For each household who receives assistance, documentation of meeting the applicable Homeless or At Risk of Homelessness criteria (as referenced in Section 2.2.1) must be maintained. Details may be found in Appendix A-2 and A-3. <i>If funded via CHG, utilize CHG Verification of Household Eligibility and Income Recertification Form (Appendix C-2).</i> <i>If funded via ESG, utilize ESG Verification of Household Eligibility – Prevention Form (Appendix C-11).</i>
Annual Income
For each household who receives assistance, the following documentation of annual income must be maintained: <ul style="list-style-type: none">• Source documents for the assets held by the household and income received over the most recent period for which representative data is available before the date of the evaluation (e.g., wage statement, unemployment compensation statement, public benefits statement, bank statement); or• Written certification by the participant of the amount of income the household received for the most recent period representative of the income that the household is reasonably expected to receive over the next month following the evaluation. <i>If funded via CHG, utilize CHG Verification of Household Eligibility and Income Recertification Form (Appendix C-2), CHG Income Eligibility Worksheet (Appendix C-3), and (if applicable, if participant has no income) CHG Self-Declaration of Housing Status or No Income Form (Appendix C-5).</i>

<i>If funded via ESG, utilize ESG Verification of Household Eligibility – Prevention Form (Appendix C-11)</i>
Residency
For each household who receives assistance, documentation of applicable residency criteria (as referenced in Section 2.2.1) must be maintained. The following sources of verification are allowable: Lease in participant name; Utility bill; DMV-issued Identification; Voters Registration card; Current medical card; Self-Certification of Housing Status
Household Contribution
The household contribution of their current income toward their rent each month must be clearly documented and includes a utility allowance if the household pays for utilities directly.
Financial Assistance Documentation (if Financial Assistance is Provided)
<u>Rental Assistance (Security Deposit, Rent Payments, Last Month's Rent, Arrears)</u> <ul style="list-style-type: none"> • Lease in participant name • Verification of landlord ownership of property <u>Utility Assistance (Deposit, Arrears)</u> <ul style="list-style-type: none"> • Current utility bill in participant name <u>Moving Cost</u> <ul style="list-style-type: none"> • Invoice for services
Service and Assistance Records
<ul style="list-style-type: none"> • Documentation of services and assistance provided to that participant, including evidence that the service provider or subservice provider has conducted an annual assessment of services for those participants that remain in the program for more than a year and adjusted the service package accordingly. Where applicable, compliance with the termination of assistance requirement. • Documentation of the types of supportive services provided under the service provider's program and the amounts spent on those services. The service provider or subservice provider must keep record that these records were reviewed at least annually and that the service package offered to participants was adjusted as necessary. • Programs should also consider keeping a log of households that were not eligible. Such documentation would show a monitor/auditor that the time spent by personnel is reasonable, particularly in periods of very low number of eligible households being served but with a high level of salaries. This practice is recommended for any activities that might result in a low amount of assistance delivered, as it would demonstrate the program is incurring legitimate costs for the program.
Additional Funder Documentation Requirements: CHG
Targeted Prevention Eligibility Screening Form
Programs funded with CHG - Standard funds must complete and maintain the <i>CHG Targeted Prevention Eligibility Screening Form (Appendix C-7)</i> for each household who is at imminent risk of homelessness and receives rental assistance.
Washington Residential Landlord-Tenant Act
Programs must provide information on the Washington Residential Landlord Tenant Act (RCW 59.18) to households receiving rent assistance.
Utility-Only Assistance
Utility-Only Assistance (including arrears): can be provided when no other utility assistance, such as LIHEAP, is available to prevent a shut-off, and documented using the <i>CHG Utility-Only Assistance Form</i> (See Appendix C-14).

Additional Requirements for ESG-Funded Programs	
Initial Consultation & Eligibility Determination	
The household must receive an initial consultation and eligibility assessment to determine housing status eligibility and the appropriate type of assistance needed to regain stability in permanent housing. This must be clearly noted or documented in the household file.	
Assistance in Obtaining Mainstream and Other Resources	
The household must receive appropriate supportive services and referrals essential to achieving independent living through other federal, state, local and private assistance. This must be clearly noted or documented in the household file.	
Housing Stability Plan	
Must include: <ul style="list-style-type: none"> Needs assessment to include specific housing and self-sufficiency goals Action steps to retain permanent housing after ESG assistance ends. 	
ESG Verification of Eligibility for Re-Certification	
At a minimum, each re-certification of eligibility must establish that: <ol style="list-style-type: none"> The household does not have an annual income that exceeds 30 percent of median family income for the area, as determined by HUD; AND The household lacks sufficient resources and support networks necessary to retain housing without ESG assistance. Use the required <i>ESG Verification Household Eligibility – Re-Certification Form</i> (Appendix C-13) for documentation.	
Utility Assistance	
Utility Assistance (including arrears): can be provided when no other utility assistance, such as LIHEAP, is available to prevent a shut-off, and documented using the <i>ESG Utility-Only Assistance Form</i> (See Appendix C-15).	

2.4.1.3 DOCUMENTATION COLLECTION

Programs should begin working with participants to collect documentation at enrollment. If documentation has not been collected within 45 days, programs are not required to terminate participants from the program, but they may elect to do so. If documentation is not required until sometime after enrollment, then programs may not terminate until 45 days after the documentation deadline. Programs must document their efforts to obtain eligibility documentation during this period and should only terminate participants as a last resort. Any information collected during this period should be updated in HMIS and any documentation collected should be scanned and uploaded into HMIS, so the participant record is as accurate as possible, and a more appropriate referral can be made.

2.4.2 METRICS

The following measures are typically used to evaluate the performance of The Road Home CoC programs. Measures may be added or amended based on specific funding source requirements, CoC priorities, or evaluation strategies.

Category	Metric
	ESG-Funded
Prevention Program Outcomes	Number of people served
	Average length of stay in program

	Percentage of successful housing outcomes
	Percentage of households who return to the HCRS for additional homelessness response services within 2 years from exit
	Percentage of households who increase their income

Category	Metric
	All Funding Sources
Data Collection and Reporting	Percentage of HMIS data that is complete and accurate
	Percentage of HMIS data that is entered within 5 business days from initial enrollment
Contract Management	Percentage expenditure of funds
	Percentage of Contract Payment Requests submitted accurately and on time

Where practicable, the Program Outcomes above will also be evaluated to assess for the presence of any discrepancies or disparities across demographic categories (gender, race, ethnicity, and age tier).

2.5 ELIGIBLE ACTIVITIES

2.5.1 ELIGIBLE ACTIVITIES OVERVIEW

Funds must be used to prevent an individual or family from moving into an Emergency Shelter or another place not meant for human habitation. The costs of Homelessness Prevention are only eligible to the extent that the assistance is necessary to help the participant regain stability in the participant's current permanent housing or move into other permanent housing and achieve stability. Eligible cost categories are included in the table below.

Prevention	ESG	THA	CHG	DRF
ELIGIBLE ACTIVITIES				
Rental Assistance				
Rent Payments				
Rental Assistance – for profit, non-profit, gov't. Cannot exceed 24 mo. Including:	X	X	X	X
• Rental Arrears, including associated late fees	X		X	X
• Lot rent for RV or manufactured home		X	X	X
• Utilities, when included in rent		X	X	X
• Other fees, when included in rent		X	X	X
Landlord Incentive				
• Reimbursement for damages paid to a landlord			X	X
Hotel/Motel		X	X	X
Parking Space Connected to Unit			X	X
Security Deposits	X	X	X	X
Last Month's Rent	X	X	X	X
Other Costs Associated with Rent				
Credit Checks		X	X	X
Housing Application Fees	X	X	X	X
Legal fees and fines				X
Moving Costs	X	X	X	X
Storage Costs		X	X	X
Utility Assistance/Deposits	X	X	X	X
Utility Arrears	X		X	X
Costs Associated with Emergency Transfer Plans	X			
Project Operations				
Costs Associated with Payroll				
Housing Search and Placement	X	X	X	X
Housing Stability Case Management	X	X	X	X
HMIS Data Collection and Entry	X	X	X	X
Staff Issuance of Rental Assistance		X	X	X
Sub-Contracted Services		X	X	X

Prevention	ESG	THA	CHG	DRF
Supportive Service Costs				
Child Care				X
Credit Repair - budgeting/money management	X			X
Education Services				X
Employment Assistance				X
Housing Counseling	X			
Legal Services	X			X
Life Skills				X
Mediation	X			X
Mental Health Services				X
Outpatient Health Services				X
Substance Abuse Treatment Services				X
Transportation				X
Other Program Costs				
General Liability Insurance		X	X	X
Office Internet		X	X	X
Office Space		X	X	X
Office Supplies		X	X	X
Office Utilities		X	X	X
Staff Training/Conference/Per Diem			X	X
Telephone		X	X	X
Administrative Expenses				
Advertising				X
Communications				X
Facilities Maintenance & Repairs				X
Insurance				X
IT Support, Software, Computer Equipment				X
Machinery & Equipment				X
Office & Operating Supplies				X
Personnel Salaries & Benefits				X
Professional Services				X
Public Utilities				X
Small Tools & Minor Equipment				X
Washington State Quality Assurance				X

2.5.2 DETAILED ELIGIBLE ACTIVITIES: SPECIFIC TO FUNDING SOURCE

2.5.2.1 ESG-FUNDED PREVENTION ELIGIBLE EXPENSES

The costs of prevention under ESG are only eligible to the extent that the assistance is necessary to help the participant regain stability in the participant's current permanent housing or move into other permanent housing and achieve stability in that housing. Detailed explanation of eligible costs/activities under ESG-funded Prevention programs are included in the table below.

ESG-Funded Program Eligible Activities	
Rental Assistance	
Rent Payments	
<ul style="list-style-type: none">• Rental Assistance: paid monthly, may not exceed six months of rent• Rental Arrears: one-time payment for up to six months in arrears, including late fees. Must align with policy in 2.3.3.4.• Security Deposit: Equal to no more than two months' rent• Last Month's Rent: Paid to the owner of housing at the time security deposit and first month's rent are paid	
Other Costs Associated with Rent	
<ul style="list-style-type: none">• Housing Application Fees: Application fee that is charged by the owner to all applicants• Moving Costs: Such as truck rental or hiring a moving company, <u>including certain temporary storage fees</u>• Utility Assistance: Up to 24 months of utility payments per participant per service, including up to six months of Utility Arrears, per service. Must align with policy in 2.3.3.4.<ul style="list-style-type: none">○ Utility-Only Assistance (including arrears): can be provided when no other utility assistance, such as LIHEAP, is available to prevent a shut-off, and documented using the <i>ESG Utility-Only Assistance Form</i> (See Appendix C-15).• Utility Deposit: Standard utility deposit required by the utility company for all customers• Costs associated with Emergency Transfer Plans, such as: amounts owed for breaking a lease	
Program Operations	
Costs Associated with Payroll	
<ul style="list-style-type: none">• Housing Search and Placement<ul style="list-style-type: none">○ Assessment of Housing Barriers, Needs and Preferences○ Development of an Action Plan for Locating Housing○ Housing Search and Outreach to and Negotiation with Owner○ Assistance Submitting Rental Applications and Understanding Leases○ Assessment of Housing for Compliance with ESG Requirements for Habitability, Lead Based Paint, and Rent Reasonableness○ Assistance Obtaining Utilities and Making Moving Arrangements○ Tenant Counseling• Housing Stability Case Management: This assistance cannot exceed 30 days during the period the participant is seeking permanent housing and cannot exceed 24 months during the period the program participant is living in permanent housing.<ul style="list-style-type: none">○ Using the Centralized System to Conduct Initial Evaluation and Re-Evaluation○ Counseling○ Developing, Securing, and Coordinating Services Including Federal, State, and Local Benefits○ Monitoring and Evaluating Participant Progress○ Providing Information and Referrals to Other Providers	

ESG-Funded Program Eligible Activities	
<ul style="list-style-type: none"> ○ Developing and Individualized Housing and Stability Plan ● HMIS Data Collection and Entry <ul style="list-style-type: none"> ○ Paying salaries for operating HMIS, including: <ul style="list-style-type: none"> ▪ Completing data entry ▪ Monitoring and reviewing data quality ▪ Completing data analysis ▪ Complying with HMIS requirements ○ Staff travel costs to conduct intake 	
Supportive Services Costs	
<ul style="list-style-type: none"> ● Credit Repair: including credit counseling and other related services. Does not include payment or modification of a debt. ● Mediation: including time and/or services associated with mediation services ● Legal Services, including: <ul style="list-style-type: none"> ○ Hourly Fees for Legal Advice and Representation ○ Fees Based on the Actual Service Performed (Only if the cost would be less than the cost of hourly fees) ○ Participant Intake, Preparation of Cases for Trial, Provision of Legal Advice, Representation at Hearings, and Counseling ○ Filing Fees and Other Necessary Court Costs ○ Program Employee's Salaries and Other Costs Necessary to Perform Services (If the program is a legal services provider and performs the services itself) ○ Legal Representation and Advice Pertaining to the Following Subjects: Landlord/Tenant Matters, Child Support, Guardianship, Paternity, Emancipation, Legal Separation, Resolution of Outstanding Criminal Warrants, Orders of Protection and Other Civil Remedies for Victims of Domestic Violence, Dating Violence, Sexual Assault, and Stalking, Appeal of Veterans and Public Benefit Claim Disputes 	

2.5.2.2 THA-FUNDED PREVENTION ELIGIBLE EXPENSES

Eligible THA-funded Prevention activities are summarized in the table below.

THA-Funded Program Eligible Costs	
Rent	
Rent Payments	
<ul style="list-style-type: none"> ● Rental Assistance: monthly rental assistance payments, not to exceed 24 months. Does not include Rental Arrears. Must align with policy in 2.3.3.4. ● Lot Rent: for RV or manufactured home ● Utilities, which are included in rent ● Other fees that are included in rent, including landlord administrative fees ● Hotel/Motel expenses: when used as shelter or waiting for an HQS inspection on a unit ● Security Deposits: for moving into new units (not limited to one) ● Last Month's Rent: Paid to the owner of housing at the time security deposit and first month's rent are paid 	
Other Costs Associated with Rent	
<ul style="list-style-type: none"> ● Credit Checks: if necessary/required for rental housing 	

<ul style="list-style-type: none"> • Housing Application Fees: Application fee that is charged by the owner to all applicants, including background checks. • Moving Costs: (includes renting a truck, moving supplies, temporary storage for 90 days or less) • Utility Assistance: Up to 24 months of utility payments per participant per service. Does not include Utility Arrears. Must align with policy in 2.3.3.4. • Utility Deposits: Standard utility deposit required by the utility company for all customers
Project Operations
Costs Associated with Payroll
<ul style="list-style-type: none"> • Housing Search and Placement Services: services or activities designed to assist households in locating, obtaining, and retaining suitable housing, tenant counseling, assisting households to understand leases, inspections, securing utilities, making moving arrangements, and representative payee services concerning rent and utilities. • Housing Stability Case Management: This includes developing an individualized housing and service plan, monitoring and evaluating household progress, SSI/SSDI Outreach, Access, and Recovery (SOAR), connecting to other needed services or mainstream benefits, and assuring that households' rights are protected. • HMIS Data Collection and Entry: staff time for activity; must be directly attributable to project • Staff Issuance of Rental Assistance: staff time for activity; must be directly attributable to project • Sub-Contracted Services: includes temporary employees contracted through an agency or third-party providers paid by the service provide to provide direct service.
Other Program Costs
<ul style="list-style-type: none"> • General liability insurance • Office Internet, Space, Supplies, Utilities, and Telephone: costs of items that are directly attributable to the project; otherwise costs must be charged as Administrative Expenses. <ul style="list-style-type: none"> ○ Office supplies are items that aid in the short-term operation of your organization. These items usually need to be refilled or replaced. These include items such as printer ink, paper clips, paper, pens, staples, record keeping supplies, janitorial supplies, break room supplies, etc.

2.5.2.3 CHG-FUNDED PREVENTION ELIGIBLE EXPENSES

Eligible CHG-funded Prevention activities are summarized in the table below. This includes both CHG Standard funds and HEN funds.

CHG-Funded Program Eligible Costs
Rental Assistance
Rent Payments
<ul style="list-style-type: none"> • Monthly Rental Assistance: monthly rent payment and any combination of first and last months' rent. Rent may only be paid one month at a time, although rental arrears, pro-rated rent, and last month's rent may be included with the first month's payment. Must align with policy in 2.3.3.4. <ul style="list-style-type: none"> ○ <i>Temporary absence:</i> If a household must be temporarily away from the unit but is expected to return (such as temporary incarceration, hospitalization, or residential treatment), service providers may pay for the household's rent for up to 60 days and charge the grant for eligible costs. While a household is temporarily absent, he or she may continue to receive case management. Any temporary absence must be documented in the participant file.

<ul style="list-style-type: none"> ○ Subsidized housing: Rent/Utility Assistance may be used for move-in costs (security deposits, first and last month's rent) for subsidized housing (where household's rent is adjusted based on income), including project- or tenant-based housing. Rental arrears or utility arrears assistance may be used for subsidized housing. ● Rental Arrears: includes associated late fees and may be for up to three months. Rental arrears may be paid if the payment enables the household to obtain or maintain permanent housing. If funds are used to pay rental arrears, arrears must be included in determining the total period of the household's rental assistance. Must align with policy in 2.3.3.4. <ul style="list-style-type: none"> ○ Rental arrears for HEN households can be paid for a time period when the household was not HEN enrolled. ● Lot Rent: for RV or manufactured home ● Utilities, which are included in rent ● Other fees that are included in rent, including landlord administrative fees ● Landlord Incentives: paid to landlords, including reimbursement for damages ● Hotel/Motel Expenses: when used as shelter or waiting for an HQS inspection on a unit ● Parking Spaces: when connected to a unit ● Security Deposits: for households moving into new units ● Last Month's Rent: Paid to the owner of housing at the time security deposit and first month's rent are paid
Other Costs Associated with Rent
<ul style="list-style-type: none"> ● Credit Check: if necessary/required for rental housing ● Housing Application Fees: when charged to all applicants, also includes background checks and costs of urinalyses for drug testing of household members if necessary/required for rental unit ● Moving Costs: Costs associated with moving, if required to obtain/maintain permanent housing, including NW Furniture Bank fee ● Storage Costs: Up to one month of storage fees, if required to obtain/maintain permanent housing ● Utility Assistance: payments for households also receiving Rental Assistance <ul style="list-style-type: none"> ○ Can be provided when no other utility assistance, such as LIHEAP, is available to prevent a shut-off, and documented using the <i>CHG Utility-Only Assistance Form</i> (See Appendix C-14). ● Utility Deposits: for a household moving into a new unit ● Utility Arrears: for up to three months, if the payment enables the household to obtain or maintain permanent housing. If funds are used to pay utility arrears, arrears must be included in determining the total period of the household's financial assistance. Must align with policy in 2.3.3.4. ● Other costs: as approved by the County and Commerce <ul style="list-style-type: none"> ○ Renter's Insurance: Only if it is required in the lease
Operations
Costs Associated with Payroll
<ul style="list-style-type: none"> ● Housing Search and Placement Services: services or activities designed to assist households in locating, obtaining, and retaining suitable housing, tenant counseling, assisting households to understand leases, inspections, securing utilities, making moving arrangements, and representative payee services concerning rent and utilities. <ul style="list-style-type: none"> ○ Includes intake and assessment (time spent assessing a household), whether or not the household is determined eligible

<ul style="list-style-type: none"> ○ Includes mediation and outreach to property owners/landlords related to locating or retaining housing ● Housing Stability Services: This includes developing an individualized housing and service plan, monitoring and evaluating household progress, identifying creative and immediate housing solutions outside of the traditional homeless service system (Diversion), SSI/SSDI Outreach, Access, and Recovery (SOAR), and assuring that households' rights are protected. ● HMIS Data Collection and Entry: staff and benefits for activity; must be directly attributable to project ● Staff Issuance of Rental Assistance: staff and benefits for staff costs directly attributable to the project ● Sub-Contracted Services: includes temporary employees contracted through an agency or third-party providers paid by the service provide to provide direct service. ● Other costs: as approved in advance by the County and Commerce
Other Program Costs
<ul style="list-style-type: none"> ● General Liability Insurance: also includes automobile insurance ● Office Internet, Space, Supplies, Utilities, and Phone: when directly attributable to the project <ul style="list-style-type: none"> ○ Office supplies are items that aid in the short-term operation of your organization. These items usually need to be refilled or replaced. These include items such as printer ink, paper clips, paper, pens, staples, record keeping supplies, janitorial supplies, break room supplies, etc. ● Training or Conferences: related to service delivery, including travel and per diem
HEN ONLY
<ul style="list-style-type: none"> ● Flexible Funding for Essential Needs: the provision of goods or payments of expenses not included in other allowable expense categories, which directly help a household to obtain or maintain permanent housing or meet essential household needs. Verification of housing status is not required for households with a HEN Referral and does not need to be documented in housing stability plans. Flexible Funding payments must be paid directly to a third party on behalf of the household and noted in a household's housing stability plan. Essential household needs means: <ul style="list-style-type: none"> ○ Personal health and hygiene items ○ Cleaning supplies ○ Transportation passes ○ Other personal need items

2.5.2.4 DRF-FUNDED PREVENTION ELIGIBLE EXPENSES

Eligible DRF-funded Prevention activities are summarized in the table below. Other costs may be approved by the County on a case-by-case basis. Please contact PCHS Homeless Programs for further information.

DRF-Funded Program Eligible Costs
Rent
Rent Payments
<ul style="list-style-type: none"> ● Rental Assistance: monthly rental assistance payments, not to exceed 24 months. Must align with policy in 2.3.3.4. <ul style="list-style-type: none"> ○ <i>Temporary absence:</i> If a household must be temporarily away from the unit but is expected to return (such as temporary incarceration, hospitalization, or residential treatment), service

<p>providers may pay for the household's rent for up to 60 days and charge the grant for eligible costs. While a household is temporarily absent, he or she may continue to receive case management. Any temporary absence must be documented in the participant file.</p> <ul style="list-style-type: none"> ○ <i>Subsidized Housing</i>: rent/utility assistance may be used for move-in costs (security deposits, first and last month's rent) for subsidized housing (where household's rent is adjusted based on income), including project- or tenant-based housing. Rental arrears or utility arrears assistance may be used for subsidized housing. ● Rental Arrears: includes associated late fees and may be for up to three months. Rental arrears may be paid if the payment enables the household to obtain or maintain permanent housing. Lot rent for RV or manufactured home. Must align with policy in 2.3.3.4. ● Utilities, which are included in rent ● Other fees that are included in rent may be eligible; please check with County staff for pre-approval ● Landlord Incentives: paid to landlords, including: <ul style="list-style-type: none"> ○ Reimbursement for damages ○ Additional deposits ● Hotel/Motel Expenses: when used as shelter or waiting for an HQS inspection on a unit ● Parking Spaces: when connected to a unit ● Security Deposits: for moving into new units (not limited to one) ● Last Month's Rent: Paid to the owner of housing at the time security deposit and first month's rent are paid ● Other costs: as approved in advance by the County
Other Costs Associated with Rent
<ul style="list-style-type: none"> ● Credit Check: if necessary/required for rental housing ● Housing Application Fees: when charged to all applicants, also includes background checks and costs of urinalyses for drug testing of household members if necessary/required for rental unit ● Legal fees and fines, if necessary to obtain or maintain permanent housing ● Moving Costs: assistance includes cost of renting a truck, moving supplies ● Temporary Storage: for 90 days or less, if necessary to obtain or maintain permanent housing ● Utility Assistance: Up to 24 months of utility payments per participant per service, including up to six months of Utility Arrears, per service. Must align with policy in 2.3.3.4. ● Utility Deposits: Standard utility deposit required by the utility company for all customers ● Utility Arrears: for up to six months, if the payment enables the household to obtain or maintain permanent housing. Must align with policy in 2.3.3.4. <ul style="list-style-type: none"> ○ Utility-Only Assistance (including arrears): can be provided when no other utility assistance, such as LIHEAP, is available to prevent a shut-off, and documented using the <i>CHG Utility-Only Assistance Form</i> (See Appendix C-14). ● Other costs: as approved by the County
Operations
Costs Associated with Payroll
<ul style="list-style-type: none"> ● Housing Search and Placement Services: services or activities designed to assist households in locating, obtaining, and retaining suitable housing, tenant counseling, assisting households to understand leases, inspections, securing utilities, making moving arrangements, and representative payee services concerning rent and utilities. <ul style="list-style-type: none"> ○ Includes intake and assessment (time spent assessing a household), whether or not the household is determined eligible

<ul style="list-style-type: none"> ○ Includes mediation and outreach to property owners/landlords related to locating or retaining housing ● Housing Stability Services: This includes developing an individualized housing and service plan, monitoring and evaluating household progress, identifying creative and immediate housing solutions outside of the traditional homeless service system (Diversion), SSI/SSDI Outreach, Access, and Recovery (SOAR), and assuring that households' rights are protected. ● HMIS Data Collection and Entry: staff and benefits for activity; must be directly attributable to project ● Staff Issuance of Rental Assistance: staff and benefits for staff costs directly attributable to the project ● Sub-Contracted Services: includes temporary employees contracted through an agency or third-party providers paid by the service provide to provide direct service. ● Other costs: as approved in advance by the County
<p>Supportive Service Costs – All activities below MUST be directly related to a household’s ability to obtain or maintain permanent housing.</p> <ul style="list-style-type: none"> ● Child Care: The costs of establishing and operating childcare, and providing childcare vouchers, for children from families experiencing homelessness, including providing meals and snacks, and comprehensive and coordinated developmental activities, are eligible. <ul style="list-style-type: none"> ○ The childcare center must be licensed by the jurisdiction in which it operates in order for its costs to be eligible. ○ Children must be under the age of 13, unless they are disabled children. Disabled children must be under the age of 18. ● Credit Repair: including budgeting or money management ● Education Services: The costs of improving knowledge and basic educational skills are eligible. Services may include instruction or training in consumer education, health education, substance abuse prevention, literacy, English as a Second Language, and General Educational Development (GED). <ul style="list-style-type: none"> ○ Component services or activities are screening, assessment and testing; individual or group instruction; tutoring; provision of books, supplies, and instructional material; counseling; and referral to community resources. ● Employment Assistance: The costs of establishing and operating employment assistance and job training programs are eligible, including classroom, online and/or computer instruction, on-the-job instruction, services that assist individuals in securing employment, acquiring learning skills, and/or increasing earning potential. The cost of providing reasonable stipends to participants in employment assistance and job training programs is also an eligible cost. <ul style="list-style-type: none"> ○ Learning skills include those skills that can be used to secure and retain a job, including the acquisition of vocational licenses and/or certificates. Services that assist individuals in securing employment consist of: <ul style="list-style-type: none"> ▪ Employment screening, assessment, or testing ▪ Structured job skills and job-seeking skills ▪ Special training and tutoring, including literacy training and pre-vocational training ▪ Books and instructional material ▪ Counseling or job coaching ▪ Referral to community resources

- **Legal Services:** Eligible costs are the fees charged by licensed attorneys and by person(s) under the supervision of licensed attorneys, for advice and representation in matters that interfere with the homeless individual or family's ability to obtain and retain housing.
- **Life Skills**
- **Mediation**
- **Mental Health Services:** Eligible costs are the direct outpatient treatment of mental health conditions that are provided by licensed professionals. Component services are crisis interventions; counseling; individual, family, or group therapy sessions; the prescription of psychotropic medications or explanations about the use and management of medications; and combinations of therapeutic approaches to address multiple problems.
- **Outpatient Health Services:** Eligible costs are the direct outpatient treatment of medical conditions when provided by licensed medical professionals including:
 - Providing an analysis or assessment of an individual's health problems and the development of a treatment plan
 - Assisting individuals to understand their health needs
 - Providing directly or assisting individuals to obtain and utilize appropriate medical treatment
 - Preventive medical care and health maintenance services, including in-home health services and emergency medical services
 - Provision of appropriate medication
 - Providing follow-up services
 - Preventive and non-cosmetic dental care
- **Substance Abuse Treatment Services:** The costs of participant intake and assessment, outpatient treatment, group and individual counseling, and drug testing are eligible. Inpatient detoxification and other inpatient drug or alcohol treatment are ineligible.
- **Transportation** – includes costs for participant transportation, reimbursement for staff travel to meet with or assist a participant
 - Bus tickets/token or pass
 - Reimbursement or direct payment for gas (participant)
 - Reimbursement for mileage (staff)
 - Gas cards are NOT eligible
- **Other costs:** as approved in advance by the County

Other Program Costs

- **General Liability Insurance:** also includes automobile insurance
- **Office Internet, Space, Supplies, Utilities, and Phone:** when directly attributable to the project
 - Office supplies are items that aid in the short-term operation of your organization. These items usually need to be refilled or replaced. These include items such as printer ink, paper clips, paper, pens, staples, record keeping supplies, janitorial supplies, break room supplies, etc.
- **Training or Conferences:** related to service delivery, including travel and per diem
- **Other costs** as approved by the County.

Administrative Expenses

Administrative Expense are costs an organization incurs that are not directly charged to a specific function or program but are related to the organization as a whole. Administrative Expenses may not exceed 10% of the Direct Program costs (Rental Assistance + Program Operations). Costs may include:

- **Advertising**
- **Communications**
- **Facilities Maintenance & Repairs**

- **Insurance**
- **IT Support, Software, Computer Equipment**
- **Machinery & Equipment**
- **Office & Operating Supplies**
 - Office supplies are items that aid in the short-term operation of your organization. These items usually need to be refilled or replaced. These include items such as printer ink, paper clips, paper, pens, staples, record keeping supplies, janitorial supplies, break room supplies, etc.
- **Personnel Salaries & Benefits**, including:
 - Executive Staff
 - Human Resources
 - Accounting
 - Legal
- **Professional Services**
- **Public Utilities**
- **Small Tools & Minor Equipment**

2.5.3 INDIRECT COSTS

Indirect costs eligibility varies by funding source. Indirect costs are eligible within ESG, DRF, and THA funding awards. Indirect costs are not eligible expenses under CHG funding.

Service providers with an approved federally negotiated indirect cost rate may charge Indirect Costs to their awards. Indirect costs are defined at [2 CFR 200.413](#) and [200.414](#). Service providers that do not have an approved federally negotiated indirect cost rate may charge an Indirect Costs rate of 10% of modified total direct costs, per [2 CFR 200.414\(f\)](#). Projects may not apply indirect costs to rental assistance or leasing costs.

2.5.4 SUBMITTING FOR COST REIMBURSEMENT

Pierce County administers its grants on a cost reimbursement basis only. Service providers may only request reimbursement for eligible costs (as defined in this section, by fund source) and for which they have included in their contract budget. Requests for reimbursement must be submitted on the County-provided invoice document, called a Contract Payment Request form (CPR). CPRs must be submitted to PCCCHMLSLnv@piercecountywa.gov within 21 working days following the month in which the expenditures were incurred. The submission of incomplete or inaccurate information may delay the reimbursement process.

The expectation for supporting documentation for reimbursement of costs will be determined by the service provider's fiscal and accounting infrastructure:

- **For service providers that have an accounting system or software** that produces expense reports, the expectation would be an expense report with all costs easily identified, where costs requested for reimbursement are clearly classified from other agency costs, is required. Attach this report to the reimbursement request. The Provider will retain documents and actual receipts reflected in the expense report and be available for monitoring from Pierce County Human Services Contract Monitors, State Auditors and Federal Reviews as applicable.

- **For Providers that do not have an accounting system or software** that produces expense reports, the expectation is copies of receipts, and paid invoices will be provided with each payment request. The Provider will retain the original documents and actual receipts to be available for monitoring from Pierce County Human Services Contract Monitors, State Auditors and Federal Reviews as applicable.

All service providers are to complete the Salaries and Benefits Tab in the invoice template to clearly identify the portion of employee costs being requested. Proof that employees worked for the agency during the time period of the reimbursement request is required, so pay stubs (redact personal information) or a payroll report is required in addition to completing the Salaries and Benefits tab.

2.6 ADDITIONAL RESOURCES

2.6.1 RELATED MANUALS AND RESOURCES

Resource	Link
Washington State Department of Commerce Consolidated Homeless Grant Guidelines	https://www.commerce.wa.gov/serving-communities/homelessness/consolidated-homeless-grant/
Emergency Solutions Grant (ESG) Regulations	https://www.hudexchange.info/resource/1927/hearth-esg-program-and-consolidated-plan-conforming-amendments/
Rent Reasonableness & FMR Guide	https://files.hudexchange.info/resources/documents/CoC-Rent-Reasonableness-and-FMR.pdf
Additional Guidance on Rental Assistance Agreements	https://www.hudexchange.info/news/snaps-shots-requirements-for-rental-assistance-agreements-and-leases-under-the-emergency-solutions-grants-esg-program/

2.6.2 REQUIRED FORMS

Form	Appendix Item
ALL PROGRAMS	
Prevention Extension Request Form	C-9
HUD Rent Reasonableness Checklist & Certification Form	B-3
CHG-FUNDED PROGRAMS	
Where appropriate, CHG forms may be utilized with other funding sources.	
CHG Verification of Household Eligibility and Income Recertification	C-2
CHG Income Eligibility Worksheet	C-3
CHG Third Party Verbal Verification of Housing Status, Chronicity, or Income Form	C-4
CHG Self-Declaration of Housing Status or No Income Form	C-5
CHG Targeted Prevention Eligibility Screening Form	C-7
CHG Certification of Payment Obligation/Potential Eviction from Friend/Family Form	C-8
CHG Utility-Only Assistance Form	C-14
ESG-FUNDED PROGRAMS	
ESG Rental Assistance Agreement Sample	B-5
ESG Verification of Eligibility – Prevention Form	C-11
ESG Verification of Eligibility for Re-Certification Form	C-13
ESG Utility-Only Assistance Form	C-15

2.6.3 REFERENCED APPENDICES

Item	Appendix Item
HUD Homeless Definition & Documentation Resource	A-2
HUD At-Risk of Homelessness Definition	A-3
HQS Pre-Inspection Checklist	B-2
THA Catchment Area Map	B-4