HOMELESS HOUSING PROGRAM POLICY AND OPERATIONS MANUAL

CHAPTER 3: COORDINATED ENTRY

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CHAPTER 3: COORDINATED ENTRY

3.1 OVERVIEW OF COORDINATED ENTRY

3.1.1 PURPOSE OF THIS CHAPTER

This Chapter of the Policy and Operations Manual serves several purposes. It:

- Sets forth the policies governing The Road Home's Coordinated Entry system.

- Establishes the framework for Pierce County Human Services to request and evaluate proposals from service providers to implement CE on behalf of The Road Home CoC.

- Provides all organizations in the homeless and social service systems with a basic overview of how CE operates and what they can expect when interacting with CE.

- Specifies what homeless individuals and families can expect from CE. If households of the system have questions about CE in general or concerns about how their specific situation is being handled by CE, they can consult this document for an overview of the policies governing CE decision-making.

- Documents all required CE policies by HUD, as described in [CPD Notice 17-01: Notice Establishing Additional Requirements for a CoC Centralized or Coordinated Assessment System](1).

This Chapter outlines CE policies and does not lay out step-by-step procedures for the implementation of these policies. Procedures that align with these policies should be developed by service providers. Procedures have been included in this Chapter for policies which PCHS is responsible for implementing.

3.1.2 DEFINITION

The Department of Housing and Urban Development (HUD) requires each Continuum of Care to establish and operate a "centralized or coordinated assessment system," based on evidence that such systems increase the efficiency of local crisis response systems and improve fairness and ease of access to resources, including mainstream system resources. Participating projects use Coordinated Entry (CE) to manage coordinated intake and assessment, standardize the prioritization process, and facilitate referrals to available housing and resources.

CE serves as the system front door and is designed to match homeless households to the most appropriate housing intervention, based on their vulnerability and housing barriers, as well as project availability. When appropriate data are collected, CE processes can also provide information to The Road Home Continuum of Care (CoC) and other stakeholders about service needs and gaps, which helps communities strategically allocate their current resources and identify the need for additional resources.

To promote an effective CE system, service providers are expected to adopt the following strategies and approaches:

- **Flexibility** – It is the County's intent that the CE system is always undergoing continuous

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[1] https://www.hud.gov/sites/documents/17-01CPDN.PDF

improvement efforts. Policies, procedures, and tools will be adjusted and refined over time.

- **Mobility** – CE staff must be able to work with homeless people wherever they are.

- **Collaborative Approach** – CE providers must have the ability to build and maintain strong and effective working partnerships with all partners, especially other CE partners, Shelters, and housing partners.

- **Communication** – CE staff must have the ability to communicate how the system works to both homeless people and providers.

- **Objectivity** – Successful operation of the CE system requires that providers use consistency and fairness in applying policies and procedures and use of tools.

- **Problem Solving** – CE providers must embrace a problem-solving approach to ending homelessness. To be effective, CE providers must employ staff who are skilled at problem solving and understand how to adopt a non-judgmental, strengths-based and participant-centered approach to all aspects of service delivery.

- **Tailored** – CE providers must employ staff who are skilled at adapting their service delivery to each unique household and their needs.

- **Housing First** – The CE system design is based upon a Housing First philosophy. The organizational mission and philosophy of the selected CE providers must be aligned with Housing First principles: everyone is housing ready and there should be minimal barriers or service participation requirements imposed on homeless people as a condition of entering housing.

- **Systems Thinking** – The CE system is an essential component of the Homeless Crisis Response System (HCRS). To successfully operate the CE system, the selected providers must embrace a systems-thinking approach, understanding that the main purpose of CE is to streamline access to housing for those households with the greatest needs.

- **Data Informed** – The CE system is a critical source of information about who enters the HCRS. The data collected will be used for ongoing and continuous system improvement. The selected CE providers must have strong data management capacity and a willingness to be data informed.

3.1.3   GOALS AND OBJECTIVES

The objective of the CE system is to ensure streamlined access to the HCRS for all homeless households and ensure they are matched to an appropriate intervention to end their homelessness, based on their vulnerability and housing barriers. The CE system is the "front door" of the HCRS and one piece of the overall system infrastructure. The CE system helps the community meet its goal of ensuring that the experience of homelessness is rare, brief, and non-recurring.

Desired results of CE include:

- People receive the right resources at the right time

- Waiting times for assistance are reduced

- Length of time that housing slots are vacant is minimized — for each project opening an eligible household is quickly matched and referred to fill it

- Families and individuals receive support to solve their own housing crises and stay out of the HCRS to the greatest extent possible
- Those with the greatest vulnerability and who are hardest to serve are prioritized for help from the system
- People experiencing homelessness move to permanent housing and do not return to the system
- All populations have reasonable access to CE and receive service in a respectful, dignified, and culturally appropriate manner.

CE operates using a Housing First philosophy. All homeless people are assumed to be "housing ready" and are not required to participate in services or agree to treatment as a condition of receiving a referral to housing. Shelters and housing projects have minimal eligibility criteria and service participation requirements imposed on homeless people as a condition of entering housing.

The CE system described in this chapter is informed by local data, experience, and best practices and designed to meet federal requirements set forth by HUD and state requirements established by the Washington State Department of Commerce.

3.1.4   GOVERNANCE

The CoC has established this CE system and in the process identified Pierce County Human Services Department (PCHS) as the responsible entity for the general management of CE system. PCHS will also facilitate coordination among all projects within the CE system. The role includes:

- Planning: facilitate system design process
- Policy oversight: establish and review policies and procedures, including CE prioritization policies
- Management: management of day-to-day workflow of the CE system
- Evaluation: assess system performance to inform policies and procedures
- Community engagement: establish and maintain buy-in from entire crisis response system and continually gather feedback from the crisis response system to inform policies and procedures

Additionally, the CoC has established the CE Improvement Sub-Committee to provide oversight for implementation of the CE system. Further details about the CoC, including membership and participation requirements, can be found in the CoC Governance Charter.

3.1.5   SERVICE PROVIDER REQUIRED PARTICIPATION

Projects funded by the sources below are required to participate in CE either as an access point or through acceptance of program referrals.

- Federal Continuum of Care (CoC) Program
- Federal Emergency Solutions Grant (ESG), both State and County Allocations
- Tacoma Housing Authority funds for Rapid Re-Housing (THA)
- Consolidated Homeless Grant (CHG)
- Homeless Document Recording Fee (DRF)

CoC and ESG recipients are required to coordinate to ensure project screening, assessment, and referrals are aligned.

Any other funds received by Pierce County and administered by Homeless Programs that are not listed above are also required to participate in Coordinated Entry, unless otherwise explicitly stated.

3.1.5.1 EXCEPTIONS

Victim service providers and Same-Day Emergency Shelters are not required to participate as an access point or by accepting referrals but may opt to do so. Additionally, while victim service providers must offer connection to Coordinated Entry, they will not be measured on the rate of CE connection.

3.1.6 HOUSEHOLD AUTONOMY

Participants may freely refuse to answer any assessment questions and/or refuse any offer of housing assistance or service options without retribution or limiting their access to assistance. Program staff must not require that any person accept unsolicited services or housing assistance and must not require that households unwillingly provide information as a prerequisite for receiving assistance, unless specifically required by a funder. There is no limit to the number of refusals a household may make. See Sections 3.2.1, 3.3.4.3, 3.3.5.3, 3.3.6.4, and 3.3.11.4 for additional detail.

3.1.7 FUNDING SOURCES REFERENCED IN THIS CHAPTER

Fund sources referenced in this chapter of the Manual include:

- Emergency Solutions Grant (ESG), includes 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.

3.1.8 VERSIONS OF COORDINATED ENTRY POLICY DOCUMENT

PCHS shall be responsible for the revision, review, and approval of the CE Policies & Procedures. The revision process will be completed at least once annually, and anyone who is interested in submitting suggestions for revisions to the document should contact PCHSCommunityPrograms@piercecountywa.gov.

Version	Date Released	Key Changes
03.22	3/30/22	• Added FMR limit for Financial Assistance through Diversion • Added documentation requirement to demonstrate unit meets FMR limit
07.22	7/1/22	• Added Service and Assistance Record section
11.22	11/4/22	• Clarified Standard Eligibility: Applicable to All Funding Sources • Added Additional Eligibility: Requirements Specific to Funding Source • Updated Financial Assistance to clarify FMR limits by fund source • Added section for Participant Contribution to Housing Costs • Updated Required Documentation Section to clarify Rental Assistance documentation requirements
07.23	7/31/23	• Clarified several CHG and DRF eligible expenses

3.2 ELIGIBILITY AND TYPICAL SERVICE FLOW

3.2.1 ELIGIBILITY REQUIREMENTS FOR PROGRAM ENTRY

3.2.1.1 STANDARD ELIGIBILITY: APPLICABLE TO ALL FUNDING SOURCES

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

1. Households must be experiencing homelessness, in accordance with Category 1 or Category 4 of the U.S. Department of Housing and Urban Development (HUD)'s Homelessness Definition as defined by HUD under 24 CFR Part 578[2].

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 willingly engage with Coordinated Entry for a Screening and Assessment.

The CE system is integrated and designed to have the same access, assessment, and referral process for all populations (adults, families with children, youth, and veterans). Participants may freely refuse to answer any assessment questions and/or refuse any offer of housing assistance or service options without retribution or limiting their access to assistance. In the fully coordinated system, the United States Department of Veterans Affairs (VA) administers Veteran assessments and referrals to VA projects.

ESG-funded programs must maintain documentation on the reason(s) for the ineligibility decision in each instance in which a household is determined not to be eligible to receive ESG assistance.

3.2.1.2 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.

Funding Source	Eligibility Guidelines
ESG	No Income requirement at entry.
THA	In addition to the Standard Eligibility Requirements above, the following requirements apply for THA-funded RRH programs: 1. Eligibility is limited to either family households that include at least one minor child or youth households (under the age of 25 at enrollment and unaccompanied by a parent/guardian). 2. No member of the household can have been convicted of drug related criminal activity for production or manufacturing of methamphetamines. 3. No member of the household can be subject to a registration requirement under a state sex offender registration.

[2] See Appendix A-2 for details.

	4. Household must be comprised of US Citizens, US Nationals, or non-citizens with eligible immigration per THA's Administrative Plan (If not, household assistance must be pro-rated). 5. Household income must be at or below 50% Area Median Income at the time they are admitted to program. Household cannot be residing in subsidized housing or receiving a duplicate housing subsidy.
CHG	No Income requirement at entry.
DRF	In addition to the Standard Eligibility Requirements above, the following requirements apply for DRF-funded RRH programs: • Households eligible for DRF resources must have income at or below 50% Area Median Income.

3.2.2 TYPICAL SERVICE FLOW

CE is a system-level function. The activities provided must be mobile and available at locations where people experiencing homelessness live or seek services. CE activities will take place at a **minimum** at the following locations: (1) a central CE office location (including telephone call-in option); and (2) outdoors or in locations where unsheltered people go. Specific locations may vary.

The table below presents an overview of the key CE flow elements:
1. Initial Screening
2. Diversion Conversation
3. Priority Interview
4. Matching to Housing Projects
5. Referral to Housing Project
6. Project Enrollment

Policies relating to each element are detailed in sections below.

CE Process Flow

| Step 1. Screening | Step 2. Diversion Conversation | Step 3. Priority Interview | Step 4. Matching | Step 5. Referral |

HMIS Process Flow

| HMIS 1. Enter in Call Log & Screening Project. | HMIS 2. Enter in Diversion Convo & Diversion Project (if applicable). | HMIS 3. Complete Priority Interview Assessment & Enter in Priority Pool Project for 90 days. | HMIS 4. Run Priority Tool ART report. Match clients to vacancies using Eligibility Module. | HMIS 5. Send referral. |

Client Experience Flow

CE

1. Literally homeless or fleeing DV?

No

Refer to mainstream resource?

2. Can we help you identify an alternative, safe housing solution?

Yes

Yes

No

Housed

3. Can you tell me a bit more about your situation?

Thank you for sharing your story. Let's connect you with a shelter resource.

4. If we are able to connect you to permanent housing, we will contact you within 90 days.

90

In the meantime, what is a next step you can take to end your crisis of homelessness?

?

5. Receive referral to housing program.

Housed

3.3 POLICIES AND STANDARDS

3.3.1 FEDERAL AND STATE REGULATIONS

CE is governed by an array of state, local, and federal regulations. Service providers should reference applicable regulations included in **Chapter 1.3: Universal Policies and Standards**, as well as the policies in the table below. This is not an exhaustive list; it is the responsibility of each individual grant recipient to ensure they are in compliance with all applicable local, state, and federal regulations. In instances where regulations overlap, grant recipients must comply with the more stringent of the applicable regulations.

Policies
Americans with Disabilities Act Title II Regulations
Americans with Disabilities Act Title III Regulations
Equal Access in Accordance with an Individual's Gender Identity in Community Planning and Development Programs; HUD 24 CFR Part 5
The Fair Housing Act, 42 U.S.C. 3601 et seq.
Homeless Emergency Assistance and Rapid Transition to Housing (HEARTH): Defining ''Homeless'' Final Rule
HUD Notice CPD-17-01: Notice Establishing Additional Requirements for a Continuum of Care Centralized or Coordinated Assessment System
Nondiscrimination on the Basis of Disability in State and Local Government Services; HUD 28 CFR Part 35
Section 504, Rehabilitation Act of 1973
Title VI of the Civil Rights Act of 1964; 42 U.S.C. § 2000D et seq.

3.3.1.1 PROGRAM REQUIREMENTS FOR PROJECTS FUNDED WITH CHG

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.

3.3.2 REQUIREMENT TO DEVELOP STANDARD OPERATING PROCEDURES

The organization(s) selected by PCHS to operate CE are responsible for developing detailed procedures to operate the system in accordance with these overarching policies. Such standard operating procedures (SOPs) must be publicly available and are applicable to all CE partners. CE SOPs must include the following:

- Process for households fleeing domestic violence and seeking services from non-victim specific providers

- Process to ensure safe and confidential access to the CE system

- Process to ensure immediate access to emergency services, such as domestic violence helplines and Shelter

- Physical accessibility and reasonable accommodations

- Effective communication with individuals with disabilities

- Marketing to all households

- Marketing to household least likely to apply

- Referrals to subpopulation designed access point

- Access to emergency services

- Outreach staff CE role

- Household assessment

- Prioritization process

- Additional referral if rejected by project

- Maintaining up-to-date information on project capacities, vacancies, and eligibility criteria

- Grievance and appeal submission

- Grievance and appeal reviews

- Communicating outcomes of grievance and appeal

- Obtaining household consent

- Secure and confidential storage of records

3.3.3 GEOGRAPHY, ACCESSIBILITY, AND MARKETING

3.3.3.1 GEOGRAPHY AND ACCESSIBILITY

The CE system covers the entire Pierce County geography, which is the same geography as the CoC. The CE system must be well advertised and easily accessed. The CE system must be widely marketed and available to:

- All eligible persons regardless of race, color, national origin, religion, sex, age, familial status, disability, actual or perceived sexual orientation, gender identity, U.S. residency status or marital status

- All populations and subpopulations in the CoC's geographic area, including people experiencing chronic homelessness, veterans, families with children, youth, and survivors of domestic violence, have fair and equal access to the Coordinated Entry process, regardless of the location or method by which they access the system

- Individuals with disabilities

- Persons with Limited English Proficiency (LEP)

Specific steps to market the CE system shall include:

- Regular email updates to the general community, service providers, and City and County departments.

- Posting of CE polices and other information on the PCHS website and the websites of the CE provider(s).

- Informational flyers distributed at service locations in the community and are in multiple languages.

- Providing information about CE and the HCRS, as well as access to CE services in accessible formats, such as large print, audio, Braille, interpreters, and sign language, when necessary. Households in need of language interpreters can access such services via Pierce County Interpreter Services and/or local non-profit provider agency Tacoma Community House, which CE staff will help coordinate. Additionally, some CE staff are fluent in Spanish and equipped to conduct intake, assessment, and Diversion in Spanish when possible.

- Direct outreach to people on the street and other sites where people experiencing homelessness access services and supports.

- Announcements regarding CE information and updates during CoC or other committee meetings related to the HCRS.

- Educating mainstream service providers (including, but not limited to, Department of Social and Health Services, Public Housing Authorities, Employment Services, School Districts, Mental Health providers, and Substance Abuse providers) about how to refer someone who is literally homeless or fleeing/attempting to flee domestic violence to the CE system.

All physical system access points are accessible to individuals with disabilities, including accessible physical locations for individuals who use wheelchairs. This includes:

- CE provider offices

- Same-Day Shelters where CE activities take place

Additionally, some CE access points are located near public transportation and other mainstream services. Persons with mobility impairments may request a reasonable accommodation in order to complete the CE intake and assessment process at a different location.

3.3.3.2 AFFIRMATIVE MARKETING AND NON-DISCRIMINATION

All providers that receive funding through PCHS processes must affirmatively market their housing and supportive services to eligible persons regardless of race, color, national origin, religion, sex, age, familial status, or disability who are least likely to apply in the absence of special outreach and maintain records of those marketing activities. Housing assisted with CoC funds must also be made available to individuals and families without regard to actual or perceived sexual orientation, gender identity, or marital status in accordance with 24 CFR 5.105 (a)(2).

CE and all projects that receive referrals from CE are permitted and expected to comply with all applicable state and Federal civil rights and fair housing laws and requirements, including, but not limited to:

- Fair Housing Act prohibits discriminatory housing practices based on race, color, religion, sex, national origin, disability, or familial status

- Section 504 of the Rehabilitation Act prohibits discrimination on the basis of disability under any project or activity receiving Federal financial assistance

- Title VI of the Civil Rights Act prohibits discrimination on the basis of race, color or national origin under any project or activity receiving Federal financial assistance

- Title II of the Americans with Disabilities Act prohibits public entities, which includes state and local governments, and special purpose districts, from discriminating against individuals

with disabilities in all their services, projects, and activities, which include housing, and housing-related services such as housing search and referral assistance. Title III of the Americans with Disabilities Act prohibits private entities that own, lease, and operate places of public accommodation, which include Shelters, social service establishments, and other public accommodations providing housing, from discriminating on the basis of disability.

- HUD's Equal Access Rule at 24 CFR 5.105(a)(2) prohibits discriminatory eligibility determinations in HUD-assisted or HUD-insured housing projects based on actual or perceived sexual orientation, gender identity, or marital status, including any projects funded by the CoC Program, ESG Program, and HOPWA Program. The CoC Program interim rule also contains a fair housing provision at 24 CFR 578.93. For ESG, see 24 CFR 576.407(a) and (b), and for HOPWA, see 24 CFR 574.603.

- A CE system must not use data collected from the assessment process to discriminate or prioritize households for housing and services on a protected basis, such as actual or perceived race, color, national origin, religion, sex, age, familial status, disability, sexual orientation, gender identity, or marital status, including those least likely to access homeless assistance.

- Households must not be denied access to the CE process on the basis that the household is or has been, a victim of domestic violence, dating violence, sexual assault, or stalking

3.3.3.3   ACCESS FOR VICTIMS OF DOMESTIC VIOLENCE

Households who are fleeing or currently in unsafe situations (i.e., DV, sexual assault, stalking) may access Coordinated Entry either over the phone through South Sound 211, through DV Shelters, or through the Domestic Violence Coordinated Entry site.

3.3.3.4   COORDINATION WITH DOMESTIC VIOLENCE PROVIDERS

Victim service providers are not required to participate in CE by accepting referrals but may elect to do so. The CE governing body will consult with and incorporate guidance from all relevant victim service providers into its policies and procedures. This is to ensure accessibility, safety, and confidentiality for households who are fleeing, or attempting to flee, violence (domestic violence, dating violence, sexual assault, stalking or trafficking).

Domestic Violence Shelter providers may coordinate with CE by either having staff complete the CE Certification process or by coordinating access to CE at their site. Additionally, DV shelters may coordinated with the DV CE site directly. Victim service providers may elect to receive referrals from CE to fill program openings, as long as all personally identifying information remains confidential.

3.3.3.5   ACCESS FOR YOUTH AND YOUNG ADULTS

Households who are under 25 years old may access Coordinated Entry either over the phone through South Sound 211, through young adult shelters, or through the Youth and Young Adult Coordinated Entry site.

3.3.3.6   ACCESS THROUGH OUTREACH PROGRAMS

The goal of Outreach is to ensure that CE is available to those unsheltered households who do not actively seek Shelter or services yet have a high need for assistance from the HCRS. Outreach teams will seek out homeless households wherever they are staying (e.g., encampments), or accessing services (e.g., Healthcare for the Homeless, Family Support Centers).

While Outreach can include efforts to understand service needs (e.g., behavioral health issues), the focus of the engagement should be problem solving to meet the household's housing needs, using a housing first approach. For some chronically homeless households, multiple contacts over an extended period of time will likely be needed for engagement to be successful.

3.3.3.7   ACCESS THROUGH SAME-DAY (DROP-IN) SHELTERS

Many households with the greatest vulnerabilities and housing barriers are regular participants of Same-Day Shelters. These individuals and families frequently cycle in and out of Shelter and have some of the longest histories of homelessness. For this reason, it is critical to ensure that Same-Day Shelters are integrated into CE. Same-Day (or Drop-In) Shelters must coordinate with CE by either employing Certified CE staff or by coordinating access to CE at their site.

SAME-DAY SHELTER ACCESS

Currently, households access Same-Day Shelter through processes designed by each individual Shelter, typically involving a "first come first served" system and sometimes also a waiting list. As currently designed, CE will not change the process whereby households access Same-Day Shelter beds. A prioritization system for Shelter beds may eventually be implemented but is not part of the current CE implementation.

SAME-DAY SHELTER SERVICES

The CE provider(s) is responsible for working in partnership with Same-Day Shelters to offer the following services at Shelter sites:

- Diversion for all families and individuals occupying Same-Day Shelter beds to determine if there is a no or low-cost solution that will resolve their homelessness.

- Prioritization Interviews so that all households occupying Shelter beds are placed into the Priority Pool or CH Master List (whichever is applicable) and have the ability to access housing referrals for which they are eligible.

The CE provider(s) shall be responsible for coordinating the times when these activities will take place at the Same-Day Shelters. Same-Day Shelters may also be trained to complete these activities on behalf of CE by having staff complete the CE Certification process.

3.3.4   SCREENING & SAFETY PLANNING

3.3.4.1   PURPOSE

The purpose of Screening is to determine whether households who contact CE are literally homeless or fleeing domestic violence and therefore eligible to enter the HCRS. This activity is designed to ensure that people who are experiencing homelessness have swift access to a homeless crisis response, while

those who have other housing needs (e.g., doubled-up, couch surfing, facing eviction) are directed to appropriate mainstream resources.

Screening will be conducted by CE staff that have been identified to perform this activity and may include Outreach and Shelter staff. Screening activities will include:

- An initial Screening conversation with CE staff to determine if the household is literally homeless of fleeing domestic violence and qualifies for assistance through the HCRS. This activity can be conducted in person, over the phone or online.

- Households that contact the system by phone or online and do not speak with a live person will receive a return call within two business days.

- Those who do not qualify for assistance through the CE system will be referred to appropriate resources outside of the HCRS.

3.3.4.2 LOCATION OF SCREENING FUNCTION

As noted above, Screening may be conducted in person, over the phone, or online. In specific instances, Screening may also be conducted by:

- Street Outreach teams: Since these teams generally only work with people who are living outdoors, the Screening function in this instance involves confirming that the individual is living outside and completing the Screening questions in the Homeless Information Management System (HMIS) (see below).

- Same-Day Shelters: Households living in Shelters are already eligible for CE and do not need to be "screened." However, households seeking Shelter access will be screened to determine if a Diversion Conversation and ongoing Diversion support may either prevent them from entering Shelter entirely or allow for a rapid exit from Shelter to a stable housing solution. When CE staff are conducting Diversion Conversations with people living in Same-Day Shelters, they will also complete the Screening questions. See Section 3.3.5 for Diversion policies.

- South Sound 211 staff via 211 call-in helpline.

- CE staff either in-person, over the phone, or in a virtual meeting (Teams, etc.)

3.3.4.3 SCREENING QUESTIONS

Questions to be asked at the Screening step will be developed by PCHS in consultation with the CE provider(s). At this step, Screening staff will also begin problem-solving conversations with households to determine if an alternative housing solution can be identified, based on households' existing resources and networks. The purpose of these questions is to identify whether the household truly needs assistance from the HCRS, or if alternative resources may be untapped. Screening questions will be limited to:

- Name
- Date of Birth
- Demographic information
- Contact information
- Monthly income
- Current living situation

- Chronic homeless status
- Domestic Violence (DV) status
- Veteran status
- Language Barrier/Need for translation and, if so, in which language
- Other recent contact with the HCRS
- Other data as needed for PCHS or State of Washington data collection purposes

Participants may freely refuse to answer any screening questions without retribution or limiting their access to assistance.

3.3.4.4 DECISION POINTS

Based on how the household responds to the Screening questions, they will be directed to the appropriate system:

- If the household is in HUD Category 1, they will move forward to the Diversion Conversation. Those who conduct their initial Screening conversation over the phone may schedule a separate in-person Diversion Conversation appointment; otherwise, whenever possible, Screening conversations will naturally progress into a Diversion Conversation. This includes Conversations conducted by Street Outreach teams, South Sound 211, those taking place at Same-Day Shelter or in response to the submission of an online screening form.

- If the household is in HUD Category 4, then they will move forward to the Diversion Conversation with the DV CE provider. Those who conduct their initial Screening conversation with a non-DV CE provider will be scheduled for a separate Diversion Conversation appointment; otherwise, whenever possible, Screening conversations will naturally progress into a Diversion Conversation.

- If the household is under 25 years old, then they will move forward to the Diversion Conversation. Those who conduct their initial Screening conversation with a non-youth and young adult (YYA) CE provider will be scheduled for a separate Diversion Conversation appointment; otherwise, whenever possible, Screening conversations will naturally progress into a Diversion Conversation.

- All other households will receive information to connect them to other services and resources. Households in need of Prevention services will receive information about available resources, which are very limited. As of this publishing, there are no ESG funded Prevention projects in the community.

Households who are not in HUD Category 1 or 4 and are 25 or older will not be eligible for assistance through Diversion. However, as part of the initial Screening step, these households might identify a solution to their housing crisis. Screening staff will support households to identify next steps to resolve their housing situation, however, they will not receive any ongoing housing problem-solving support or financial resources.

3.3.4.5 HOUSEHOLD COMMUNICATION

At the Screening step of the process, households should be informed whether they qualify for entry into the homeless system. Examples include:

- *It sounds like you have a safe place to stay tonight. Our services are limited only to those who are unsheltered, or cannot safety stay where they are. I can provide you with information about other resources that can help you.*

- *It sounds like you don't have a safe place to stay tonight. I am going to connect you to someone who can help try to resolve your housing problem.*

- *It sounds like your wellbeing is at risk, due to safety issues. I am going to connect you to a domestic violence provider who can help try to address your immediate concerns.*

3.3.4.6   SAFETY PLANNING FOR PEOPLE EXPERIENCING DOMESTIC VIOLENCE

To ensure households who are fleeing DV or currently in unsafe situations (i.e., DV, sexual assault, stalking) have proper, safe, and confidential access to the CE system and appropriate victim services, CE has developed a set of Standard Operating Procedures for Screening people who identify as fleeing or victims of DV, sexual assault, and/or stalking. If a household identifies as such at initial point of contact with CE (typically, over-the-phone Screening), CE staff will:

- Collect and document household information via paper Screening and delete all electronic record of household information. Paper Screening will signal that the household must be entered into HMIS as a de-identified household at time of in-person Diversion Conversation.

- Provide household information about/referral to local DV Shelters providers and safety planning resources.

- In the case that a household expresses feeling to be in imminent danger, CE screener will suggest calling 911 and provide resources for a local Crisis Shelter specifically for people experiencing DV.

3.3.5   DIVERSION CONVERSATION

3.3.5.1   DEFINITION AND PURPOSE

The Diversion conversation is a creative, non-judgmental dialogue that is driven by a client's strengths, while identifying their barriers. It is centered around collaborative brainstorming to identify a no-cost or low-cost solution to a household's housing crisis. Diversion offers one-time support to households seeking assistance from the HCRS by tapping into households' existing resources and social networks. Diversion strategies can include conflict resolution/mediation, housing search assistance, connection to mainstream benefits or services, or small amounts of one-time financial assistance.

The purpose of Diversion is to prevent entry into Shelter and/or the HCRS (including placement in the Priority Pool) wherever possible. There are not yet enough resources in Pierce County to meet the needs of people experiencing homelessness. This includes not enough Emergency Shelter beds for people who are living in a place not meant for human habitation, and not enough Rapid Re-Housing or Permanent Supportive Housing slots for people who need to exit homelessness. Diversion helps ensure that scarce resources, especially the most intensive housing supports, can serve households in greater need.

The goal is to assist households to come up with a plan to enter a safe and appropriate housing destination that will last for at least 30 days. Diversion is not necessarily designed to provide households with housing that meets or exceeds the standard for affordable housing (i.e., 30 percent of income goes towards housing expenses), nor is its goal to end a household's poverty.

3.3.5.2   STAFFING AND LOCATION OF DIVERSION CONVERSATIONS

Diversion Conversations can take place over the phone, in a virtual meeting or in-person at locations where persons and households are seeking to access Shelter and homelessness response services. This includes Street Outreach, at CE locations, South Sound 211, and Same-Day Shelters. Staff members must be trained and certified CE Specialists to conduct the activities in this section with participants.

For Same-Day Shelters that do not conduct their own Diversion activities, CE provider(s) shall coordinate to have their staff available on-site for Diversion appointments. This process includes:

- Request by Same-Day Shelter to CE provider: generally, Shelters request a regular time slot during which CE staff will be on-site, though it can be more on an "as needed" basis

- CE provider(s) confirm availability and schedule the time block

- Shelter staff are responsible for scheduling appointments for their Shelter residents during the time when CE staff are on-site

- CE and Shelter staff will work collaboratively to minimize no-shows and ensure that CE staff time is used efficiently

3.3.5.3   DIVERSION CONVERSATION APPROACH

Diversion is conducted using a problem-solving approach and is not an eligibility interview. Households should be encouraged to identify a solution rather than waiting for a housing referral. For example: "*We have limited resources available to help you with long-term housing assistance. We'd like to try to help you identify an immediate solution that will solve your housing crisis.*"

Diversion Conversations generally cover the following topics:

- Where did you stay last night?
- How long have you been there; when do you have to leave?
- Why do you have to leave?
- Do you feel safe in the place you have been staying?
- What is your relationship with the person you are staying with?
- Do you pay anything?
- If we can't find you somewhere to sleep tonight, where will you stay?
- Can you find a place for a few nights? Where do you usually stay in emergencies? Do you feel safe staying there?
- Where do you have your belongings?
- How much income do you have?

Questions asked during this step may vary among different subpopulations, such as households fleeing domestic violence or youth experiencing homelessness. Some questions might have been asked as part of the Screening process, in which case the information may be confirmed at this step. Participants may freely refuse to answer any assessment questions without retribution or limiting their access to assistance.

3.3.5.4   DECISION POINTS

Based on the result of the Diversion Conversation, the household will choose one of two directions:

- **If a plan is identified**, the household will continue working with staff to implement the plan. These households will also be required to review and sign a document outlining their Diversion Next Steps Plan (See Appendix C-16), as well as goals and timelines. The document requires households to indicate whether they agree to "work on an immediate, short-term housing crisis stability plan with support from a CE Specialist" or "continue to look for housing on [their] own."

- **If no plan is identified**, the household will move on to a Prioritization Interview. Additional information on the Prioritization Interview may be found in **Section 3.4.6** of this Manual.

<u>DIVERSION PLAN IDENTIFIED</u>

Diversion Next Step Planning will be unique to each household; however, activities that may be pursued through a successful Diversion plan include:

- Mediation with landlord, family member or friend with whom the household may have recently stayed and where they may be able to return
- Negotiation or advocacy with landlord
- Moving into shared housing or doubling-up in housing with another person or household
- Problem solving to address housing barriers (e.g., restoring income or benefits, securing needed paperwork, etc.)
- Connection to mainstream benefits or services
- One-time financial assistance

Successful Diversion Conversations may result in the following types of plans:

- **Moving to Safe Doubled-Up Situations**: In many cases, households simply do not earn enough to live on their own. In these cases, moving (back) in with friends or family is a reasonable option to gain housing stability. CE Specialists should ensure that the household's Diversion Next Steps Plan addresses the factors that led to the household seeking Shelter in the first place, such as building conflict resolution skills through counseling services, accessing mental health services, obtaining subsidized childcare, connecting to employment services, etc.

- **Moving to an Affordable Unit:** In some cases, households may earn enough income to live on their own but lack the funds or support to initially obtain a unit. CE Specialists must ensure that the Diversion Next Steps Plan includes a household budget, including guidelines on rental prices, utility expenses, and other logistics needed to make housing successful and the budget balance. As well, the Diversion Next Steps Plan should include housing search and location services to the extent needed by the household. CE Specialists will then assist participants in locating affordable units.

- **Moving Out of County to Permanent Housing:** In rare cases, households may need or want to move outside of Pierce County in order to obtain permanent housing or to reconnect with their support networks. CE Specialists should ensure that Diversion Next Steps Plans address the logistics of moving out of county and address the factors that led to the household's homelessness.

3.3.6   PRIORITIZATION AND ELIGIBILITY

The purpose of prioritization is to identify the "best fit" housing solution for every household – meaning the least amount of assistance needed to exit homelessness. Households with higher barriers and greater vulnerability receive priority for deeper, more intensive interventions, but when these are not

available, they are given access to what is available. The information gathered as part of the process is also used to determine what interventions a household is eligible to enter.

The prioritization policy and process adopted by the CoC is designed to be fair and non-discriminatory:

- To the maximum extent possible, prioritization criteria are designed to be objective and to focus on concrete housing barriers and community-identified vulnerability factors.

- Households are not required to disclose the presence of a disability in order to be prioritized and presence of a disability by itself is not a prioritization factor.

- PCHS has tested the results of the prioritization tool to ensure that it does not result in disparate treatment of protected classes of people (race, ethnicity, age, gender).

The prioritization and eligibility interview will be given to every household that cannot be diverted from the HCRS and that meets the Screening criteria, immediately following the Diversion Conversation.

3.3.6.1 PARTICIPATING PROJECTS

All homeless projects receiving funding from PCHS Homeless Programs are accessed only through CE and must accept the households that have been prioritized (provided they meet eligibility criteria).

Households that complete the Prioritization Interview will be eligible for referral to:

- Transitional Housing

- Rapid Re-Housing

- Permanent Supportive Housing

Vacancies in these projects are filled using the prioritization criteria described in this section.

PROJECT VACANCIES NOT FILLED THROUGH PRIORITIZATION PROCESS

The only County-funded projects not accessed through CE are Emergency Shelters. Access to Emergency Shelter is determined by each Shelter provider using their own criteria. Emergency Shelters typically use a separate waiting list system to fill their beds. Section 3.3.3.7 describes how Emergency Shelters coordinate with the CE system. Emergency Shelters operate during times of the day when CE is not open. Households may access Emergency Shelter and then, once they are sheltered, can be prioritized for housing assistance.

3.3.6.2 PRIORITIZATION CRITERIA

The CE prioritization criteria were developed by PCHS in consultation with a CE workgroup with representation from HCRS providers (City, County, and non-profit agencies). The general approach to prioritization is to give precedence to those with the greatest vulnerability or barriers to housing:

- People most at-risk to imminent harm if they remain homeless

- People who have the greatest barriers to accessing housing

One approach to prioritization is used for all populations – there are not separate criteria for subgroups such as families, single adults, veterans, youth, etc. The table below summarizes the criteria used in the

CE system.

PRIORITIZATION CRITERIA	
1. Housing Barriers Factors – Prioritize People Who Are Hardest to House	2. Vulnerability Factors – Prioritize High Risk of Death or Immediate Harm
• Chronically homeless	• Age (under 18, over 65)
• Length of time unsheltered	• Acute or chronic medical condition posing immediate risk of harm
• Disabling condition (health or behavioral health challenge or functional impairment) impairing ability to secure housing	• Imminent danger from family, household member, other people in the person's life (including DV)
• No income or extremely low income (below 10% AMI)	• Active substance abuse causing risk to self or others
• Criminal record (felony)	• Pregnancy
• Eviction history	• Frequent criminal justice interactions
• Lack of recent rental history	• Acute current mental health symptoms causing risk to self or others
• Large household size	• Engaging in risky behavior in exchange for money/shelter

3.3.6.3 STAFFING AND LOCATION OF PRIORITIZATION

The Prioritization Interview is generally done immediately following the Diversion Conversation. Many of the data elements are collected as part of the Diversion Conversation. Following the attempt at Diversion, the CE staff person will go back and ask any prioritization questions that have not yet come up during the Diversion Conversation. The CE provider(s) shall employ trained and certified Coordinated Entry staff to conduct this step of the process.

The Prioritization Interview can take place over the phone, in a virtual meeting or in-person at locations where persons and households are seeking to access Shelter and homelessness response services. This includes Street Outreach, at CE locations, South Sound 211, and Same-Day Shelters. Staff members must be trained and certified CE Specialists to conduct the activities in this section with participants.

For Same-Day Shelters that do not conduct their own Diversion activities, CE provider(s) shall coordinate to have their staff available on-site for Diversion appointments. This process includes:

- Request by Same-Day Shelter to CE provider: generally, Shelters request a regular time slot during which CE staff will be on-site, though it can be more on an "as needed" basis

- CE provider(s) confirm availability and schedule the time block

- Shelter staff are responsible for scheduling appointments for their Shelter residents during the time when CE staff are on-site

- CE and Shelter staff will work collaboratively to minimize no-shows and ensure that CE staff time is used efficiently

3.3.6.4 PRIORITIZATION TOOL

PCHS contracted with Focus Strategies to develop a prioritization tool that uses the criteria identified above. Features of the tool include:

- The tool includes a set of questions that are designed to assess the criteria identified above, based on the household's self-report.

- Two additional questions are included which allow the interviewer to flag a household that is not able to complete the interview due to functional impairment (mental illness, substance use, health condition).

    1. Was the household able to complete the interview? (Y/N)

    2. Does the household demonstrate significant functional impairment (e.g., due to active substance use, mental health, health condition, physical or development disability, or something similar)? (Y/N)

  If the answers to question 1 is "No" or the answer to question 2 is "Yes," then designated CE staff may complete all non-HUD required questions on behalf of the participant. This will help to ensure complete prioritization data is collected for all participants.

- The questions are designed to use the most objective and least intrusive ways of asking for information.

- Each question in the tool is scored; when complete, the tool generates a total priority score for the household.

- Households with longer histories of homelessness, higher housing barriers and greater vulnerability receive higher scores.

- The specific tool scoring rubric is known only to PCHS.

- The scoring result is not immediately known to the staff conducting the Prioritization Interview.

- The tool result is generated inside HMIS and used to create the Priority Pool.

- The tool does not attempt to match households to an appropriate intervention type (e.g., PSH, RRH, TH) based on their score. It creates scores that can be used for dynamic and continuous prioritization.

Participants may freely refuse to answer any assessment questions without retribution or limiting their access to assistance.

3.3.6.5 COMMUNICATION WITH PARTICIPANT REGARDING PRIORITIZATION

When a participant has completed the Prioritization Interview, the prioritization result will not be immediately known. The household will be placed into the Priority Pool (see below for policies relating to lengths of stay in the Pool).

The message at this stage is: "*If we are able to connect you to a housing project, we will let you know within 90 days. In the meantime, what is a next step you can take to end your crisis of homelessness?*"

3.3.7 PRIORITY POOL

The Priority Pool is designed to ensure those with the highest vulnerability and barriers are prioritized for assistance and that these households have the shortest possible wait time for assistance. Minimizing wait times is an overall objective of the system for all households. However, given the limited number of housing placements currently available, households with lower needs currently experience long waits.

3.3.7.1 RESPONSIBILITY FOR PRIORITY POOL MANAGEMENT

PCHS is responsible for management of the HMIS system and for setting up the Priority Pool as a project within HMIS. The CE provider(s) is responsible for managing the Priority Pool, including:

- Ensuring all households who complete the Prioritization Interview have their response recorded in HMIS so that a score can be generated.

- Entering households into and exiting household from the "Priority Pool" project in HMIS.

- Using the Priority Pool list to determine which households will be matched to which project vacancies.

3.3.7.2 RULES GOVERNING PRIORITY POOL

- All households that receive a Prioritization Interview will be added to the Pool with an auto-exit date that is 90 days from the date of entry. This ensures that the list does not become stale and filled with households who can no longer be contacted. Households who re-enter CE and are re-prioritized may go back on the list.

- The list is maintained in order based on prioritization tool score. All households (single adults, families, youth) are in the same Pool.

- If a household is matched to an opening within the 90 days, they are only removed from the Pool at time of referral to a project. Households may decline a referral, and in this case, will return to the Pool, maintaining their original exit date.
    - If the household declines the referral after the 90 days has elapsed, the household may re-enter the Priority Pool with an updated exit date.

- If a household is matched to an opening but cannot be located after three attempted contacts (by phone, text, or email), their enrollment in the Pool will automatically expire at the auto-exit date, and CE will move on to the next household in order of priority.

- Households who are in the Priority Pool may choose to return to the Diversion step and receive assistance if they are able to identify a low-cost solution to resolve their homelessness. When this occurs, the household is removed from the "Priority Pool" project and re-entered into the "Diversion" project in HMIS.
    - If a household in this situation is unable to attain permanent housing, they may be re-entered into the Priority Pool with an updated exit date.

When a household auto-exits the Priority Pool after 90 days without securing housing, they may return to the Screening and Diversion steps and re-enter the Priority Pool for another 90 days.

3.3.8 CHRONIC HOMELESS MASTER LIST

Households who self-report they meet chronic homeless criteria[3] will be placed onto the Chronic Homeless (CH) Master List in place of the Priority Pool for 90 days, with an automatic exit date. (Households do not need to co-exist on both the CH Master List and the Priority Pool as both lists feed into the priority tool for referral.)

If a household is prioritized for a housing referral and either cannot be contacted by any method listed in their contact information or does not have contact information, Outreach staff will be asked to provide household location support. If the household cannot be located by an Outreach worker, they will remain on the CH Master List for up to three months from the time of their last contact.

Unlike the Priority Pool, if CH households have a new contact with the HCRS, their exit date will be adjusted to 90 days from the most recent contact date. Households are removed from the CH Master List only when:

- They are referred to a housing project and secure housing

- There has been no contact with the household for more than three months.

If it is determined the household is not chronically homeless, they are removed from the CH Master List and entered into the Priority Pool for 90 days from their original CH Master List entry date.

3.3.9 PRIORITY LIST

The priority list is the combination of all households in the Priority Pool and on the CH Master List, ranked by priority score. CE will pull an updated priority list from HMIS daily, from which housing referrals will be made. CE will make referrals from the top of the list until all openings are filled. See **Section 3.3.11** for more information on the matching and referral process.

3.3.10 VACANCY TRACKING

The Daily Vacancy Tracking (DVT) sheet in Google Docs will be used to manage the tracking of vacancies in participating projects and for matching eligible households from the priority list. All participating projects are required to enter their available vacancies in the DVT daily as they open. All vacancies must be filled within two business days. Projects are responsible for entering any funder-required eligibility criteria into HMIS that may limit which households may be referred to fill each vacancy.

The CE provider is responsible for maintaining regular communication with all participating projects to ensure their vacancies are being entered in a timely fashion and to troubleshoot any problems. CE staff are responsible for maintaining the DVT and making any needed technical fixes to ensure vacancies can be entered.

3.3.11 MATCHING AND REFERRALS

3.3.11.1 PROCESS

The CE provider will be responsible for matching households on the priority list to available vacancies on an ongoing basis. This section describes the process for matching to all units:

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[3] See Section 8.2.1.1 for more details.

- The household with the highest priority score will be matched to an available vacancy, provided the household meets the eligibility criteria for the project.

- If the household does not meet the criteria for any available openings, the CE provider may skip to the next household on the priority list. The CE provider is expected to match households with the highest need (i.e., the highest priority score) first and cannot skip to subsequent households, except in the case that the household cannot be matched or has fallen out of contact. As new project openings are made available, CE will attempt to match these households who could not be previously matched to an opening.

- PSH vacancies are filled only from the CH Master List, using the process described above. However, households on the CH Master List are not limited only to receiving PSH referrals and may be matched to a Rapid Re-Housing project.

3.3.11.2 ACCEPTING REFERRALS

When a match is made, the CE provider shall send the contact information for the household to the housing provider to verify eligibility and offer a referral/placement into the project. If the household has recently been in contact with an Outreach team member, that person will also be included in the referral. Likewise, if the household is eligible for or is currently receiving Critical Time Intervention (CTI) services, a CTI team member will also be included in the referral. When the housing provider receives the household information, they shall mark the referral as accepted in HMIS.

If the household accepts the referral, the housing provider will enroll the household in the project. Additionally, housing providers must adhere to the following:

- The provider is responsible for documenting household eligibility for the respective project upon entry. The provider should verify the household's situation is accurate and/or has not changed, confirming the household eligibility.

- Once a household has been verified as being eligible, the provider cannot impose additional and/or new criteria to screen out households.

- Projects that continuously refuse admission to eligible households will be at risk for loss of funding from PCHS (see Section 3.4.11.3 below).

3.3.11.3 HOUSING PROVIDER DECLINATION OF REFERRALS

NOT ELIGIBLE FOR PROGRAM OPENING

If the housing provider determines that the household is not actually eligible for the program opening, the housing provider should decline the referral. The housing provider should then request a new referral and CE will return the household to the Priority Pool with the original exit date. Any incorrect information should be updated in HMIS prior to returning the household to CE so that the error is not repeated with the next referral.

If the eligibility issue is relatively minor, the provider should problem solve with the household to see if it can be resolved. In some cases, issues with ineligibility can be resolved through the housing provider admitting the household into a different project for which they are eligible, provided there is a vacancy.

NOT ELIGIBLE FOR HOMELESS CRISIS RESPONSE SYSTEM

If the housing provider determines that the household is not actually eligible to be served in the homeless system (i.e., not homeless) then the housing provider will inform the CE provider and the household will be removed from the Priority Pool and referred to mainstream resources as appropriate. The CE staff are responsible for informing the household they have been removed and the reason.

REFERRAL SENT IN ERROR

If the household was sent to the housing provider in error (i.e., the CE staff should not have made the referral), the provider should decline the referral and the household will remain in the Priority Pool with their original exit date.

HOUSING PROVIDER OPTS TO DECLINE

Housing providers may turn down no more than five percent of referrals. Should a housing provider report greater than five percent rate of referral refusal, PCHS will address this performance issue in accordance with the process specified in their contract. Steps in the process include: a problem-solving meeting, performance improvement plan, loss of contract funding, and then loss of future funding. Reasons for declining a referral that do not count against the refusal rate include:

- Household does not meet eligibility criteria for project.
- Household did not show up for multiple intake appointments or loss of contact with household.
- Household specifically states they do not want services.

Any other reason would be considered a "decline by provider" and will count towards the five percent rate of refusal.

HOUSEHOLD FIT

Note that if a household referred for a PSH vacancy and does not need indefinite supportive services at time of intake and the housing provider also has a Rapid Re-Housing vacancy, the housing provider may request that the household be assigned to RRH. If the housing provider does not have an RRH vacancy, they can recommend that the household be referred for the next available RRH placement.

3.3.11.4 HOUSEHOLD DECLINATION OF REFERRAL

The household may decline the placement and remain in the Priority Pool, keeping their place on the list. There is no designated maximum number of declines per household, however housing provider staff should work alongside households and encourage them to accept referrals whenever possible, given the scarcity of housing resources in Pierce County. Households will receive no retribution or limiting of access to assistance as a result of declining housing or service options.

If a household declines a referral after the 90-day Priority Pool period has lapsed, they may be re-entered into the Priority Pool with a new exit date.

3.3.11.5 "NO CONTACT"

If the housing provider cannot get in contact with the referred household after three attempts, on at least three business days, then they must wait two business days after the final attempt before they can

return the referral to CE. This process should be completed in no less than three days for Shelter referrals, five days for non-chronic household referrals, or 10 days for chronically homeless household referrals. The housing provider must update the status of the referral to declined and indicate "Lost Client Contact" in HMIS.

3.3.12 STAFF TRAINING REQUIREMENTS

All CE staff are required to complete the CE certification process prior to delivering services. The CE certification process is comprised of a series of trainings (called "Creative Conversations"), conversation observations, one-on-one coaching and shadowed conversations before being certified as a CE staff member. See the CE Specialist Certification Checklist in Appendix C-17 for more detail.

To the extent possible, CE staff in-training will complete their conversation observations and shadows in a context similar to their anticipated work environment, to facilitate the best possible learning environment. The certification process will also include a final approval from an authorized CE Coach. The CE Coach shall have the discretion to amend the training requirements (i.e., increase or decrease) during the final conversation shadow, based on the skill demonstrated by a staff member in training. See the CE Final Shadow Certification Form in Appendix C-18 for more detail. (For more information about CE Coaches, please see Section 3.4.12.3 below.) Once a staff person has completed all the required training, the CE Coach shall notify the County of the newly certified staff member.

3.3.12.1 MODIFIED CE TRAINING PROCESS FOR TRANSFERRING CE SPECIALISTS

If a new staff person has been previously trained in a similar Coordinated Entry process (i.e., one that includes a housing problem-solving conversation) from another community, then that staff person may request to complete a condensed training process. Request forms should be directed to County staff, who will either approve or deny the request. See the Modified CE Training Request Form in Appendix C-19.

If approved, for the purpose of consistency, staff will still need to complete the Creative Conversation training requirement. However, the other requirements may be reduced. The CE Coach will still have the discretion to amend the training requirements (i.e., increase or decrease) during the final conversation shadow, based on the skill demonstrated by a staff member in training. Once a staff person has completed all the required training, the CE Coach shall notify the County of the newly certified staff member.

3.3.12.2 RE-CERTIFICATION TRAINING

All certified CE staff will need to be recertified annually by completing an annual skill training and policy/procedure training. To ensure CE staff are provided ongoing, up-to-date information and training, PCHS will coordinate annual trainings regarding Screening, Diversion Conversation, and the Prioritization Interview. PCHS staff or an experienced contracted third-party will conduct these annual trainings. CE staff will be trained on the purpose and function of the Diversion Conversation and Prioritization Interview process, as well as how these components fit within the greater CE system. During these trainings, CE staff will also be made aware of any new updates to or expectations for the assessment tool and process. CE providers shall also review and update procedures annually with all CE certified staff.

3.3.12.3 CE COACHES

Coordinated Entry Coaches are a vital part of the CE Specialist training process. CE Coaches provide one-on-one training and skill development feedback for CE Specialists-in-training. Ideally, every agency with CE Specialist Staff would also have a trained CE Coach. Program Managers/Supervisors are encouraged to become CE Coaches so they can support their staff through the training process. Experienced staff may also complete the Coaches Training Process and become a CE Coach, with Supervisor approval. See the CE Coach Application in Appendix C-20 and CE Coach Certification Checklist in Appendix C-22 for more details. In addition to completing the training, Coaches are expected to provide tailored support for CE staff in-training. This support shall include at a minimum arranging for the completion of pre-requisites for staff-in-training, support arranging observations and shadows (as needed), conducting one-on-one mock conversations, supporting CE Specialists to implement their Skill Improvement Plan, Coaching for small groups during monthly CE Collaborative meetings, and supporting the Trainers during the Full Creative Conversation Training. See the CE Coach Expectations in Appendix C-21 for more detail.

3.3.13 FINANCIAL ASSISTANCE

Financial Assistance provided through Diversion must not exceed the following Fair Market Rent (FMR) limits, as published annually by HUD[4]:

- **CHG and DRF:** Under 120% of the FMR limit. Requests to exceed 120% of FMR for extenuating circumstances may be considered by the County on a case-by-case basis.
- **THA:** Under 100% of the FMR limit.
- **ESG:** Under 100% of the FMR limit.

3.3.13.1 ELIGIBLE ACTIVITIES

Financial Assistance provided through Diversion is intended to offer very flexible financial assistance in order to allow creative solutions that may assist the household in obtaining housing and eliminating the need for Shelter or other homeless housing resources. Eligible financial assistance includes:

- Background checks (credit and criminal background check fees)

- Certification/license fees related to employment

- Criminal justice and legal assistance

- Interpreter payment assistance

- Landlord fees (application fees, holding fees, and other administrative fees)

- Moving cost assistance (the cost of necessary storage, renting a moving truck and any supplies needed for moving such as boxes, tape, or renting a dolly)

- Rental assistance (Includes rental arrears and rental fees)

- Security deposit (Includes a security deposit required to secure housing and pet deposits)

- Transportation (Includes car repairs; transportation cost related to employment, childcare or education and bus/plane tickets.)

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[4] Fair Market Rent limits for any year can be found here: https://www.huduser.gov/portal/datasets/fmr.html

- Utility bill payment assistance (Includes utility deposits or arrears)

- Work or education related materials

- Other items may be eligible at the discretion of Pierce County

3.3.13.2 PARTICIPANT CONTRIBUTION 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 and documented in the service provider's policies and/or procedures.

- Rental assistance is to be individualized and based on participant need. Rental assistance can include 100% coverage of the first month rent, and, if applicable and eligible by fund source, a one-time payment toward rental arrears. Maximum allowable payment toward rental arrears varies by fund source, see Section 3.5 for more detail. Financial assistance may also cover the remainder of move-in costs.

- 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

Payment towards rent/utility arrears may be provided. 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, if possible. Maximum allowable payment toward rental and utility arrears varies by fund source, see Section 3.5 for more detail.

3.3.13.3 REQUIRED DOCUMENTATION

CE provider(s) must follow County policies associated with providing financial assistance, including (but not limited to):

- Collecting appropriate documents from the household (i.e., homeless verification, ROIs, income verification, etc.).

- Documenting that the unit meets the applicable FMR standard limit.

- Obtaining appropriate expense approvals.

- Verifying the location of the housing where the household will live. Households may move out of Pierce County.

- Verifying that any housing unit to be assisted meets habitability requirements.

- Performing a visual lead-based paint inspection (if unit developed before 1978).

- Verifying county parcel ownership.

RENTAL ASSISTANCE DOCUMENTATION REQUIREMENTS

Based on the funding source and type of Rental Assistance provided, the following documentation is required:

Funding Source	Type of Rental Assistance	Allowable Documentation
THA and DRF	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 *CHG Certification of Payment Obligation/Potential Eviction from Friend or Family Form* (See Appendix C-8) is acceptable.
	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.
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 *CHG Certification of Payment Obligation/Potential Eviction from Friend or Family Form* (See Appendix C-8).

3.3.14 HABITABILITY STANDARDS

Assistance provided through Diversion is not subject to a Housing Quality Standards inspection: however, the landlord must certify that the unit is habitable (see Appendix C-6 for Landlord Habitability Certification Form).

Additionally, to prevent lead poisoning in young children, Coordinated Entry operators (including Diversion) must comply with the Lead-Based Paint Poisoning Prevention Act of 1978 and its applicable regulations found at 24 CFR 35, Parts A, B, M, and R. Please see Lead Based Paint Visual Assessment Requirements in Appendix B-1 for more information.

3.3.15 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;
- Provide 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.

3.4 PERFORMANCE MEASUREMENT

3.4.1   DATA COLLECTION AND DOCUMENTATION REQUIREMENTS

3.4.1.1   DATA COLLECTION EXPECTATIONS

All CE activities are recorded in Pierce County's HMIS. Procedures relating to data entry are described in the *PCHS HMIS User Manual*. CE provider(s) are responsible for:

- Entering data into HMIS at all stages of CE process (Screening, Diversion, Prioritization, and Referral).

- Monitoring vacancies, identifying any issues with slow or inaccurate entry of vacancies by providers, and reporting problems to PCHS.

- Generating reports as required by PCHS.

- Working with PCHS to analyze data, identify areas of poor and weak performance, and problem solve to improve effectiveness of CE.

Staff must ensure all required data elements are entered, timely and accurately in, into HMIS as a client progresses through the CE process. Additionally, staff must upload required documents to HMIS to ensure client profiles are complete. If household refuses to give consent to enter their information into HMIS, service providers should follow the HMIS protocol for non-consenting data entry.

3.4.1.2   DOCUMENTATION REQUIREMENTS

The CE provider is responsible for collecting documents to verify that a household is eligible for a project vacancy before making the referral. The goal of the documentation process is to:

- Minimize the number of rejected referrals, by ensuring that to the greatest extent possible, all eligibility factors are documented before a household is referred to a project.

- Minimize the chances that a household will have to repeat or duplicate the collection of documents, by ensuring that documentation is gathered close to the time that the referral will be made (ideally within 30 days) so that all verifications are current when the household is referred.

All collected documents should be scanned and uploaded into HMIS to prevent duplicative documentation collection, as much as possible. While preventing duplication is a goal of the system, there will inevitably be situations where documentation is collected more than once. This is particularly true in projects that require income documentation at project entry. The CE provider should ensure income documentation is collected and is up to date before and at time of referral; however, in some situations the income documentation will have to be updated when the household arrives at the project for enrollment.

Other documentation collected by CE staff during this time include:

- Homeless verification
- Income documentation
- HMIS Release of Information
- Personal identification, if possible

- o Identification or Driver's License (for adults)
- o Birth Certificates (for minors)
- o Social Security Cards
- Disability verification, if applicable and available
- Next Steps form or Housing Stability Plan

In general, 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. Best practices for collecting documents when interaction with household is not in-person:

- Text pictures of the documents to staff
- Email copies/photos of documents to staff
- Arrange to collect documentation in-person

For households enrolled in Projects for Assistance in Transition from Homelessness (PATH), the PATH team will provide support to housing providers to locate and contact the household, as well as aid in gathering needed documentation for project enrollment.

Service and Assistance Records

- Documentation of the types of supportive services provided under the service provider's program and the amounts spent on those services.

- 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.

3.4.2   REPORTING AND EVALUATION

3.4.2.1 REPORTING

CE providers will be monitored for meeting project performance benchmarks. Should a provider be unable to achieve or exceed set benchmarks, they will work alongside PCHS to look more closely at project data, determine root causes for not meeting performance expectations, collaborate on and implement strategies for improvement, and monitor performance post-implementation to directionally move towards meeting the set benchmarks.

3.4.2.2 EVALUATION POLICY

For quality assurance purposes and to allow for community involvement, each year PCHS, on behalf of the CoC, will evaluate the CE system using qualitative and quantitative data about how it is working. This process review intake, assessment, and referral processes, and will include gathering community input and feedback from a range of stakeholders, including (but not limited to) housing and service providers, CE staff, and CE households. Methods used by PCHS for collecting community input may include

interviews, surveys, and focus groups; this process will be announced by the County and open to the public. The privacy of households and their information will be protected throughout the evaluation process. All evaluation results will be made publicly available and published on Pierce County's website.

Areas that will be measured for performance include:

- Screening
  - Screenings per full time employee, per month

- Diversion
  - Percent of eligible households connecting with CE through Same-Day Shelter who receive a Diversion Conversation within a set number of business days
  - Percent of households who are successfully diverted within set timeframe
  - Number of Diversion Conversations per FTE, per month

- Matching and Referral
  - Rate of referrals that meet project eligibility criteria (determined by funder requirements; does not include other excessive project-specific requirements).
  - Percentage of referrals that are made within two business days of program opening

- Data Collection and Reporting
  - Percent of HMIS data that is complete and accurate
  - Percent of HMIS data that is entered within set number of days from initial collection

- Outreach
  - Percent of people engaged via Outreach who receive a Diversion Conversation

3.4.2.3 EVALUATION PROCEDURES

The procedures below describe the roles and actions of PCHS staff and/or consultants as well as the roles and actions of service providers as it pertains to evaluating CE activities and outcomes.

CE EVALUATION: COLLECTING INFORMATION FROM PROJECT AND PARTICIPANTS FOR EVALUATION

Action By	Action
PCHS staff	**Notifies** project partners and participants of opportunities to provide feedback for the evaluation of CE
PCHS staff	**Disseminates** in-person meeting times and electronic feedback options
PCHS staff	**Holds** in-person feedback opportunities
PCHS staff	**Manages** electronic feedback mechanism and reviews information collected
PCHS staff	**Summarizes** all information into a condensed version for review

CE EVALUATION: SELECTING PROJECT PARTICIPANTS TO PROVIDE FEEDBACK

Action By	Action
PCHS staff	**Outreaches** to CE partners to begin recruiting project participants
CE staff	**Recruits** project participants during intake, at point of referral, and randomly selects participants on the Priority Pool
CE staff	**Provides** electronic feedback opportunity and in-person meeting times to project participants interested in participating
PCHS staff	**Holds** in-person feedback opportunities

PCHS staff	**Managers** electronic feedback mechanism and reviews information collected
PCHS staff	**Summarizes** all information into a condensed version for review

CE EVALUATION: USING EVALUATION FOR IMPROVEMENT

Action By	Action
PCHS staff	**Reviews** all collected information
PCHS staff	**Creates** a summarized report with findings/recommendations
PCHS Supervisor	**Reviews** preliminary report
PCHS staff	**Presents** report to CE Governance Board/CoC Board
CE Governance Board	**Makes final recommendations** for implementation

3.4.3   METRICS

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

Category	Metric
Outreach	Percent of people engaged via Outreach who receive a Diversion Conversation
Screening	Number of screenings per FTE, per month
	Percentage of screened-in (eligible) households who receive a Diversion Conversation: • On-demand • Over the phone
Diversion Outcomes	Number of Diversion Conversations per FTE, per month
	Percentage of households successfully diverted from homelessness
	Percentage of households who return to the system after a successful Diversion
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 collection
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).

3.5 ELIGIBLE ACTIVITIES

3.5.1 ELIGIBILE ACTIVITIES OVERVIEW

Funds may be used to conduct the elements of Coordinated Entry or to support a household's identified housing solution. Eligible cost categories are included in the table below.

Coordinated Entry	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
• Rental Arrears, including associated late fees			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
Last Month's Rent		X	X	X
Other Costs Associated with Rent				
Credit Checks		X	X	X
Housing Application Fees		X	X	X
Legal fees and fines				X
Moving Costs		X		X
Storage Costs				X
Utility Assistance/Deposits		X	X	X
Utility Arrears			X	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
Subcontracted Services		X	X	X
Supportive Service Costs				
Mediation		X	X	X
Transportation		X	X	X
Other Program Costs				
Flex Funds			X	X

Coordinated Entry	ESG	THA	CHG	DRF
General Liability Insurance		X		X
Office Internet		X		X
Office Space		X		X
Office Supplies		X		X
Office Utilities		X		X
Staff Training/Conference/Per Diem		X		X
Telephone		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

3.5.2 DETAILED ELIGIBLE ACTIVITIES: SPECIFIC TO FUNDING SOURCE

3.5.2.1 ESG-FUNDED COORDINATED ENTRY ELIGIBLE EXPENSES

Detailed explanation of eligible costs/activities under ESG-funded CE programs are included in the table below.

ESG-Funded Program Eligible Activities
Program Operations
Costs Associated with Payroll
Housing Search and Placement   - 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.

ESG-Funded Program Eligible Activities

o Using the Centralized System to Conduct Initial Evaluation and Re-Evaluation
  o Counseling
  o Developing, Securing, and Coordinating Services Including Federal, State, and Local Benefits
  o Monitoring and Evaluating Participant Progress
  o Providing Information and Referrals to Other Providers
  o Developing and Individualized Housing and Stability Plan
• **HMIS Data Collection and Entry**
  o Paying salaries for operating HMIS, including:
    ▪ Completing data entry
    ▪ Monitoring and reviewing data quality
    ▪ Completing data analysis
    ▪ Complying with HMIS requirements
  o Staff travel costs to conduct intake

3.5.2.2 THA-FUNDED COORDINATED ENTRY ELIGIBLE EXPENSES

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

THA-Funded Program Eligible Costs
Rental Assistance
Rent Payments
• **Rental Assistance**: monthly rental assistance payments, not to exceed 24 months. Does not include Rental Arrears. • **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
• **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:** (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. • **Utility Deposits:** Standard utility deposit required by the utility company for all customers
Project Operations
Costs Associated with Payroll
• **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	
• **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. ○ 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.	

3.5.2.3 CHG-FUNDED COORDINATED ENTRY ELIGIBLE EXPENSES

Eligible CHG-funded Coordinated Entry activities are summarized in the table below.

CHG-Funded Program Eligible Costs
Rental Assistance
Rent Payments
• **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.   ○ *Temporary absence*: 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.   ○ *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 is not time limited. Rental arrears is any missed rent payment currently owed (full or partial), including the current month or past months.   ○ 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:** if no suitable shelter bed is available during housing search   • **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

- **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
- **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.
  - **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 CHG Utility-Only Assistance Form (Appendix C-14).
- **Other costs:** as approved by the County and Commerce
  - **Renter's Insurance:** Only if it is required in the lease

Operations

Costs Associated with Payroll

- **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.
  - Includes intake and assessment (time spent assessing a household), whether or not the household is determined eligible
  - Includes mediation and outreach to property owners/landlords related to locating or retaining housing
- **Housing Stability Case Management:** 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

Supportive Service Costs

- **Transportation**

Other Program Costs

- **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. 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:
  - Personal health and hygiene items
  - Cleaning supplies
  - Transportation passes
  - Other personal need items
- **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

3.5.2.4 DRF-FUNDED COORDINATED ENTRY ELIGIBLE EXPENSES

Eligible DRF-funded Coordinated Entry 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
Rental Assistance
Rent Payments
Rental Assistance: monthly rental assistance payments, not to exceed 24 months.   *Temporary absence*: 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.   *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. Lot rent for RV or manufactured home.   **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: - 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

- **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.
- **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.
  - **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 CHG Utility-Only Assistance Form (Appendix C-14).
- **Other costs:** as approved by the County

Operations

Costs Associated with Payroll

- **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.
  - Includes intake and assessment (time spent assessing a household), whether or not the household is determined eligible
  - 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

Supportive Service Costs

- **Mediation:** MUST be directly related to a household's ability to obtain permanent housing.
- **Transportation:** includes costs for client transportation, reimbursement for staff travel to meet with or assist a client

o Bus tickets/token or pass
o Reimbursement or direct payment for gas (client)
o Reimbursement for mileage (staff)
o Gas cards are NOT eligible
o **Other costs:** as approved in advance by the County

Other Program Costs

- **Flex Funds:** 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. 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.
- **General Liability Insurance**: also includes automobile insurance
- **Office Internet, Space, Supplies, Utilities, and Phone:** when directly attributable to the project
  - o 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**
  - o 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:
  - o Executive Staff
  - o Human Resources
  - o Accounting
  - o Legal
- **Professional Services**
- **Public Utilities**
- **Small Tools & Minor Equipment**
- **Other costs:** as approved in advance by the County

3.5.3   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). Service providers may not apply indirect costs to rental assistance or leasing costs.

3.5.4   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 PCCCHMLSInv@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.

3.6 ADDITIONAL RESOURCES

3.6.1 RELATED MANUALS AND RESOURCES

Resource	Link
HUD Notice Establishing Requirements for CE	https://www.hudexchange.info/resource/5208/notice-establishing-additional-requirements-for-a-continuum-of-care-centralized-or-coordinated-assessment-system/
Pierce County HMIS User Manual	https://www.piercecountywa.gov/4805/Homeless-Management-Information-System-H
HUD Resource page on Chronic Homelessness	https://www.hudexchange.info/homelessness-assistance/resources-for-chronic-homelessness/
Defining "Chronically Homeless" Final Rule	https://www.hudexchange.info/resource/4847/hearth-defining-chronically-homeless-final-rule/
Flowchart of HUD's Definition of Chronic Homelessness	https://www.hudexchange.info/resource/5181/flowchart-of-huds-definition-of-chronic-homelessness/
Sample Chronic Homelessness Documentation Checklist	https://www.hudexchange.info/resource/5182/sample-chronic-homelessness-documentation-checklist/

3.6.2 REQUIRED FORMS

Form	Appendix Item
Participant Release of Information and Informed Consent Form	C-2
Diversion Next Steps Plan	C-16
Lead Based Paint Visual Assessment Requirements	B-1
Landlord Habitability Certification Form	C-6
CHG Utility-Only Assistance Form	C-14
CE Specialist Certification Checklist	C-17
CE Final Shadow Certification Form	C-18
Modified CE Training Request Form	C-19

3.6.3 REFERENCED APPENDICES

Item	Appendix Item
HUD Homeless Definition	A-2
CE Coach Application & Expectations	C-21
CE Coaches Certification Checklist	C-22