

HOMELESS HOUSING PROGRAM POLICY AND OPERATIONS MANUAL

CHAPTER 8: PERMANENT SUPPORTIVE HOUSING

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CHAPTER 8: PERMANENT SUPPORTIVE HOUSING

8.1 OVERVIEW OF PERMANENT SUPPORTIVE HOUSING

8.1.1 DEFINITION

Permanent Supportive Housing (PSH) programs provide housing that is permanent, affordable, and independent, paired with supportive services to help participants retain stable housing. PSH provides long-term housing with a non-time-limited stay, as long as the participant complies with the terms of the lease. PSH programs have low staff to participant ratios to allow for more intensive service supports. PSH programs may require participant-centered case management services (housing navigation and stability services) but may not require participation in disability-related services. Supportive services should be made available to participants.

PSH may be provided in scattered site or facility-based settings, with different models of rental assistance and service delivery. There are three main types of rental assistance models:

- 1. Project-Based Rental Assistance (PBRA): where subsidy is connected with specific unit made available to participant
- 2. Sponsor-Based Rental Assistance (SBRA): where an agency buys or leases housing that is then rented to participants
- 3. Tenant-Based Rental Assistance (TBRA): where a participant may seek housing for a unit in private market with their choice of landlord.

8.1.2 **GOALS**

Pierce County's PSH efforts aim to achieve the following goals:

- Assist people to quickly end their homelessness and gain stable, affordable housing
- Support participants with disabilities in maintaining the least restrictive community-based housing
- Provide supportive services and link participants to mainstream resources available to meet their service needs

In addition, PSH programs will provide tailored services in accordance with the U.S. Department of Health and Human Services' Substance Abuse and Mental Health Services Administration (SAMHSA)'s philosophy of recovery and offer a referral to Foundational Community Support (FCS) services.

8.1.2.1 EXPECTATIONS FOR PERMANENT SUPPORTIVE HOUSING

• In accordance with HUD and the County priorities, as beds become vacant in existing Permanent Supportive Housing units, the project must prioritize those units for chronically homeless households with disabling conditions.

- PSH projects must provide tailored services in accordance with the U.S. Department of Health and Human Services' Substance Abuse and Mental Health Services Administration (SAMHSA)'s philosophy of recovery.
- PSH projects must offer a referral to Foundational Community Support (FCS) services
- PSH project will work with Overnight Shelter staff and Street Outreach staff to help their mutual households attain permanent housing. PSH projects should ensure households experience a seamless transition into permanent housing.

8.1.3 PARTICIPATION IN COORDINATED ENTRY

Pierce County PSH service providers are required to participate in CE and must receive referrals for program vacancies through CE. See **Chapter 3** regarding CE Prioritization, Matching and Referral policies.

8.1.3.1 PRIORITIZATION OF PSH

In alignment with HUD and local priority, as beds become vacant in existing PSH programs, units will be prioritized for households that are experiencing chronic homelessness who have a head of household with a disability considered to be long-term or indefinite that impacts their ability to maintain housing stability without access to supportive services.

8.1.4 FUNDING SOURCES REFERENCED IN THIS CHAPTER

Fund sources referenced in this chapter of the Manual include:

- Consolidated Homeless Grant (CHG), which may include:
 - CHG-Chronically Homeless Families (CHG-CHF)
 - CHG-Inflation
 - CHG-Emergency Housing Fund (CHG-EHF)
 - o 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.

8.2 ELIGIBILITY AND TYPICAL SERVICE FLOW

8.2.1 ELIGIBILITY REQUIREMENTS: FOR PROGRAM ENTRY

8.2.1.1 STANDARD ELIGIBILITY: APPLICABLE TO ALL FUNDING SOURCES

To be eligible for entry into PSH, households in Pierce County must meet all of the following criteria:

- 1. Experiencing chronic homelessness, as defined below:
 - a. A homeless individual with a disability who:
 - i. Lives in a place not meant for human habitation, or in an Emergency Shelter; and
 - ii. Has been homeless (as described above) continuously for at least 12 months or on at least four separate occasions in the last three years where the combined occasions must total at least 12 months (Occasions separated by a break of at least seven nights; Stays in institutional care facilities for fewer than 90 days do not constitute a break, as long as the individual was living or residing in a place not meant for human habitation or an Emergency Shelter immediately before entering the institutional care facility).
 - An individual who has been residing in an institutional care facility, including jail, substance abuse or mental health treatment facility, hospital or similar facility, for fewer than 90 days and met all of the criteria in paragraph (a) of this definition, before entering that facility; or
 - c. A family with an adult head of household (or if there is no adult in the family, a minor head of household) who meets all of the criteria in (a) or (b) of this definition, including a family whose composition has fluctuated while the head of household has been homeless.
- 2. Households must meet an Income Standard. Eligibility varies dependent on fund source. Please see Additional Eligibility Requirements Specific to Funding Source below.
- 3. Referred through Coordinated Entry (CE).

DISABILITY VERIFICATION AT ENROLLMENT

The following standards apply to determinations of disability as it pertains to eligibility for PSH programs. To meet the definition of disability, the following apply:

- Participant has a disability that is expected to be long-continuing or indefinite in duration
- Disability substantially impedes the household member's ability to live independently
- Disability could be improved by the provision of more suitable housing conditions; and
 - o Is a physical, mental, or emotional impairment, including impairment caused by alcohol or drug abuse, post-traumatic stress disorder, or brain injury
 - Is a developmental disability
 - Is the disease of Acquired Immune Deficiency Syndrome (AIDS) or any conditions arising from the etiologic agent for AIDS, including infection with the Human Immunodeficiency Virus (HIV)

Acceptable documentation of disability must be verified and collected prior to program enrollment. Documentation must include one of the following:

- Written verification of the disability from a professional licensed by the state to diagnose and treat the disability and his or her certification that the disability is expected to be long continuing and of indefinite duration and substantially impedes the individual's ability to live independently.
- Written verification from the Social Security Administration.
- Disability check receipt (Social Security Disability Insurance check or Veteran Disability Compensation).
- Other documentation approved by the County.

If unable to document disability at program enrollment, service provider must record observation of disability. Required documentation must be obtained within 45 days of program enrollment.

8.2.1.2 ADDITIONAL ELIGIBILITY: REQUIREMENTS SPECIFIC TO FUNDING SOURCE

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

Funding Source	Eligibility Guidelines
CHG Standard	In addition to the Standard Eligibility Requirements above, the following requirements apply for CHG Standard PSH programs and must be documented using the CHG Verification of Household Eligibility and Income Recertification Form (See Appendix C-2).
	 Households eligible for CHG Standard-funded RRH resources must meet income requirements of at or below 50% Area Median Income.
CHG-Chronically Homeless	In addition to the Standard Eligibility Requirements above, the following requirements apply for CHG-CHF-funded programs and must be documented using the CHG Verification of Household Eligibility and Income Recertification Form (See Appendix C-2).
Families (CHG-CHF)	 Households eligible for CHG-CHF resources must meet income requirements of at or below 50% Area Median Income. Household must include at least one adult and one child.
DRF	In addition to the Standard Eligibility Requirements above, the following requirements apply for DRF-funded PSH programs: Households eligible for DRF resources must have income at or below 50% Area Median Income.

8.2.2 ELIGIBILITY RE-CERTIFICATION: REQUIREMENTS FOR ENROLLED HOUSEHOLDS

There are no eligibility re-certification requirements for any fund source for PSH programs.

8.2.3 TYPICAL SERVICE FLOW

The core components of Permanent Supportive Housing are rental assistance, case management and supportive services. The table below depicts a typical service flow, noting that modifications will apply dependent on the needs of the household, the type(s) of PSH services received, and coordination that may be needed based on the number of entities involved in service provision.

Process Step	Process Detail
	1. Households are referred to PSH providers through CE.
	Upon receiving a referral, the PSH provider updates the referral status to Accepted and attempts to contact the household.
Referrals	3. Once in contact with the household, the PSH provider schedules a time to meet with the household to confirm eligibility and conduct an intake and enrollment. If service providers are unable to contact participant, the service provider should coordinate with Outreach or Critical Time Intervention (CTI) teams to help make contact with the participant. Should the PSH program team be unable to contact the household, the program may return the referral to CE with an update that the household was unable to be contacted. See Section 3.3.11.5 for more details on Lost Contact referral protocols.
	 If not already available in the participant's file, PSH service providers must verify the eligibility of households referred to their program.
Eligibility Verification, Data Collection, and Program	 Program staff will collect documentation from household verifying eligibility and, if eligible, enroll the household into the PSH program in HMIS.
Intake and Enrollment	3. PSH staff reviews all necessary intake paperwork including documents related to Program Agreements, Participant Rights and Responsibilities, and Grievance Procedures in detail with the household, and both parties sign the Agreement. A copy is provided to the household.
	 Create Housing Stability Plan: Program staff will work with the household to outline the steps that will be taken, and services needed to maintain housing. PSH staff creates a hard copy file for the participant. This must include, at a minimum:
Housing Stability Plan	 a. Housing Goals: Concrete plan and action steps for retaining permanent housing.
Development	 Financial Goals: Goal and action steps related to obtaining or maintaining income, possibly through education, employment, job training and/or financial counseling. This typically includes development of a Monthly Budget with the household.

	c. Linkages to Mainstream Resources: Goal and action steps related to obtaining all public/ mainstream benefits to which the participant is entitled and interested. This may include linkages to needed physical, mental and/or behavioral health services and supports.
Housing Location Services	If participant is entering tenant based rental assistance program, PSH service provider will complete the actions below. If participant is entering project based- or sponsor based rental assistance program, PSH service provider will skip to Process Step: Housing Unit Approval. 1. PSH staff schedules a meeting with the household to provide assistance in beginning housing search. This includes explaining the process, expectations, and role of housing location services. 2. PSH staff coordinate with the landlord liaison services to assist in finding housing for participant. 3. Housing Locator provides support/orientation to housing search to help households access units that are desirable and sustainable: a. Provides housing search tips and Housing Search Log to the participant. b. Contacts landlords that work with service providers to inquire about available units. c. Provides 1-3 vacant apartment leads to household that fit criteria as outlined in the Housing Search Planner. 4. PSH staff and Housing Locator continue to assess the participant's need for additional support in housing search.
	 Staff and participant visit identified units to conduct visual inspections and agree on a unit. Staff educates prospective landlords about the PSH program and landlord liaison services and answers any questions.
Housing Unit Approval	 Once a participant is approved for a unit, the Housing Locator begins the unit approval process. This includes verification of meeting the Housing Quality Standards (HQS). PSH staff requests an HQS inspection by contacting Pierce County Human Services. Additional details may be found in Section 8.3.3.1. HQS inspections must be completed annually. Once the Inspection is completed, the PSH service provider receives an emailed confirmation and completed form with the results of the inspection. If a unit fails inspection, the staff may work with the Landlord to fix the problems identified. Or, the participant may move on to another unit. If the unit is approved, the PSH service provider assembles/completes other documentation needed to demonstrate eligibility of the unit and maintains documentation in the participant's file including: Tax lien search results

	b. W-9 Form from landlord		
	c. Rent Reasonableness Form		
Move-In Assistance	 Once a unit is approved, the Housing Locator assists the participant with the lease-signing process. The PSH service provider completes required move-in paperwork, such as a Rental Agreement for Move-In letter which includes information on the participant's contribution towards move-in costs and rent in the first three months of the move-in. The PSH service provider confirms the transfer of keys and provides the household with a "Protect your Family from Lead in Your Home" brochure. PSH staff meet with the participant at their new home within 5 business days of their move-in to review and update their Housing Stability Plan and to provide assistance in identifying and acquiring household goods and furniture. 		
Program Exit	g. Legal representation 1. Upon exit from the PSH program, staff will close out all agency paperwork according to agency procedures and exit the household from the PSH program in HMIS. a. TBRA Program: Within the exit process, service provider must send the participant and owner a program exit letter.		

8.3 POLICIES AND STANDARDS

8.3.1 LOCAL, STATE, AND FEDERAL REGULATIONS

PSH programs are 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**. 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.

8.3.1.1 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.

8.3.2 HOUSING UNIT APPROVAL

8.3.2.1 STANDARD REQUIREMENTS FOR DETERMINING UNIT HABILITABILITY

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

PROCESS TO VERIFY HOUSING QUALITY STANDARDS

In Pierce County, all HQS inspections are completed by Pierce County Human Services. Inspections less than 12 months old performed by the Housing Authority can be used. For units that require HQS inspection, staff can request an HQS inspection by visiting the Pierce County Human Services website at https://www.piercecountywa.gov/4804/Housing-Quality-Standards-Inspections-HQ. In advance of the Inspection, the service provider must provide a copy of the inspection form to the landlord at least five days in advance of the scheduled appointment. All PSH projects must have an HQS inspection on file no less than annually.

HOUSING UNIT SIZE

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

8.3.2.2 UNIT HABITABILITY COMPLAINT PROCEDURES

Participants must be informed in writing of the habitability complaint process and assured that complaints regarding their housing unit's safety and habitability will not affect the household's eligibility for assistance. Service provider must have a written procedure describing the response to complaints regarding unit safety and habitability that includes mandatory inspection when a complaint is reported.

Inspection should be documented using the HQS Inspection Form or an alternative format that documents the specific complaint, follow-up, and resolution.

8.3.2.3 HOUSING UNIT SIZE

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

8.3.2.4 RENT REASONABLENESS AND COMPLIANCE WITH FAIR MARKET RENT

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

RENT LIMIT

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

Service providers must determine and document that rent falls at or below the FMR on every unit assisted. However, for CHG- and DRF-funded programs, if the program can document that the unit is Rent Reasonable <u>and</u> under 120% of FMR, then FMR may be exceeded. If any funds are used towards the difference between the FMR and the rental cost, those funds cannot be used towards the HUD CoC match as they are not HUD CoC eligible costs.

RENT REASONABLENESS

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

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

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

Service providers, regardless of fund source, must document that the unit complies with HUD's standards of Rent Reasonableness¹.

8.3.2.5 PROGRAM POLICIES PERTAINING TO ANNUAL CERTIFICATIONS

Service providers must conduct an Annual Certification of eligibility for PSH participants within 12 months of the last Annual Certification of eligibility. The Annual Certification includes a housing habitability assessment to confirm adherence to HQS, income re-certification, and lease renewals (or moves to a new unit, if requested and secured).

Information regarding the habitability assessment process may be found in Section 8.3.2.1. For the process of Annual Certifications, habitability assessment processes should begin 120 days prior to the Annual Certification deadline. The income re-certification processes for the Annual Certification should begin 90 days prior to the Annual Certification deadline.

8.3.3 RENTAL PAYMENTS

8.3.3.1 PARTICIPANT LEASE & DOCUMENTATION REQUIREMENTS

Participants in PSH must have written and legally binding leases for the units in which they will live and receive rental assistance. Participant leases must have an initial term of 1 year, renewable for terms that are a minimum of one month long, and terminable only for cause.

With the exception of instances in which the service provider uses a master lease structure to obtain units for participants, the lease must be between the participant and owner. If a service provider uses a master lease structure, the lease is between the service provider and the owner, and the service provider subleases to the participant.

8.3.3.2 LATE PAYMENTS

The service provider must make timely payments to each owner in accordance with the participant's lease. CHG and DRF funds may only be used to pay late fees in the following circumstances:

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

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

8.3.3.3 PARTICIPANT CONTRIBUTIONS TO HOUSING COSTS

Participants are responsible for paying 30% of their monthly adjusted income towards rent that is paid directly to the landlord. Participant contributions cannot exceed the full cost of the rent amount.

¹ According to <u>24 CFR 982.507 (b)</u>. See Appendix B-3 and https://www.hudexchange.info/resource/4424/coc-rent-reasonableness-and-fair-market-rent/ for more information on documenting Rent Reasonableness.

CONTRIBUTION AMOUNT RE-EVALUATION

Annual Re-Evaluation

PSH service providers must complete an annual re-evaluation with each participant that includes an income certification to make adjustments to the participant's contributions to housing costs based on any changes in income. Annual re-revaluations shall coincide with the annual HQS and lease renewal (or move to a new unit at lease end) process and commence ninety days before lease term expiration.

Interim Re-Evaluation

PSH service providers must complete an interim re-evaluation with each participant that includes an income re-evaluation whenever there is an increase in household income or if a participant requests an interim re-evaluation due to a decrease in household income. The interim re-evaluation is the process to make adjustments to the participant's contributions to housing costs based on any changes in income.

8.3.4 PROGRAM CASE MANAGEMENT AND RELATED SERVICES POLICIES

8.3.4.1 STANDARD REQUIREMENTS

Service providers must offer housing stability case management and supportive services to PSH participants. Housing stability case management consists of:

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

PSH programs may require participant-centered case management services (housing navigation and stability services) but may not require participation in disability-related services. Supportive services should be made available to participants.

PSH programs receiving CHG-CFH must offer households a referral² to Foundational Community Supports (FCS). Households are not required to participate in FSC services to remain in the program.

8.3.4.2 SUPPORTIVE SERVICES ENGAGEMENT

Supportive services are voluntary and cannot be required as a condition of tenancy but can and should be proactively offered to help participants achieve and maintain housing stability. Supportive service techniques such as harm reduction and motivational interviewing may be useful. Supportive services are helping or educational resources that include support groups, mental health services, alcohol and substance abuse services, life skills or independent living skills services, vocational services and social activities.

² An FCS provider directory can be found here: https://www.myamerigroup.com/washington-fcs/wawa-fcs-providerdirectory.pdf

8.3.4.3 APPLICATION OF PROGRESSIVE ENGAGEMENT TO CASE MANAGEMENT SERVICES

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

ADJUST FREQUENCY OF CASE MANAGEMENT MEETINGS

With the participant, PSH staff may determine that a participant needs more frequent meetings at various points throughout their tenancy. Possible indications of a need to increase case management frequency include:

- Participant acuity demonstrates high barriers to maintaining housing, particularly in areas such as tenancy, mental health and wellness, or history of homelessness.
- Participant has cognitive, developmental, or behavioral issues that have or may prevent them from accomplishing tasks or daily living activities.
- Participant has drug or alcohol use behaviors that may limit memory or ability to complete tasks.

In response, programs may elect to:

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

INCREASE SUPPORTIVE SERVICES

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

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

In response, programs may elect to:

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

ADJUST HOUSING STABILITY PLAN

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

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

In response, programs may elect to:

- Break tasks down into smaller actions and assign case management support for each action.
- Check in more regularly on progress towards achieving goals.

Participants should be provided the level and type of service and supports necessary to maintain housing stability, as soon as that level of need is identified. For example, if a higher level of support is identified from intake, then that level of support should be provided immediately. If needs exceed the capacity or training of PSH staff, service providers must refer and connect participants to appropriate supports.

8.3.5 PROGRAM EXIT

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

8.3.5.1 TERMINATION OF ASSISTANCE

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

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

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

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

8.4 PERFORMANCE MEASUREMENT

8.4.1 DATA COLLECTION AND DOCUMENTATION REQUIREMENTS

HUD universal data elements and HUD program specific data elements must be collected and reported in HMIS within five business days of participant entry into the program. Service providers should make every attempt to enter all data for a particular week by the end of that week. Additional PSH documentation requirements are detailed in the table below. Third-Party source documentation should always be sought first. If it cannot be obtained, Third-Party Written or Oral Verification should be sought (with a preference for written documentation). If neither can be obtained, then efforts to collect all types of Third-Party documentation should be recorded and Self-Certification shall be obtained from the participant and kept in the Participant File. See Appendix C-4 and C-5 for sample forms.

Documentation Requirement Details All PSH Programs

Homelessness

Standard PSH: Documentation of meeting HUD's Chronically Homeless Definition must be collected prior to enrollment. Details regarding HUD criteria may be found in Appendix C-23.

If funded via CHG, utilize CHG Verification of Household Eligibility and Income Recertification Form (See Appendix C-2).

Annual Income

Documentation of annual income must be gathered prior to enrollment:

- Source documents for the assets held by the household and income received over the most recent period for which representative data is available before the date of the evaluation (e.g., wage statement, unemployment compensation statement, public benefits statement, bank statement); or
- Written certification by the participant of the amount of income the household received for the most recent period representative of the income that the household is reasonably expected to receive over the next month following the evaluation.

If funded via CHG, utilize CHG Verification of Household Eligibility and Income Recertification Form (Appendix C-2), CHG Income Eligibility Worksheet (Appendix C-3), and (if applicable, if participant has no income) CHG Self-Declaration of Housing Status and No Income Form (Appendix C-5).

Disability Documentation

PSH service providers must verify and document disability prior to enrollment. Additional detail may be found in Section 8.2.1.1.

Habitability Verification

Documentation of meeting habitability expectations: HQS Inspection Form

Rental Agreement

Documentation of rental terms: Lease.

Rental Assistance Agreement

Documentation of rental payment terms and timelines between PSH service provider, participant, and owner.

Housing Stability Form

Documentation of Housing Stability Plan; referrals and connections to mainstream providers and resources; monthly case management services provided; and plans and progress towards self-sufficiency.

Re-Certifications (if applicable)

Documentation of Annual Certifications (housing habitability and income re-certifications) as well as any additional Interim Income Re-Certifications.

If funded via CHG, utilize CHG Verification of Household Eligibility and Income Recertification Form (Appendix C-2).

Service and Assistance Records

- Documentation of services and assistance provided to that participant, including evidence that
 the service provider or subservice provider has conducted an annual assessment of services for
 those participants that remain in the program for more than a year and adjusted the service
 package accordingly. Where applicable, compliance with the termination of assistance
 requirement.
- Documentation of the types of supportive services provided under the service provider's
 program and the amounts spent on those services. The service provider or subservice provider
 must keep record that these records were reviewed at least annually and that the service
 package offered to participants was adjusted as necessary.
- Programs should also consider keeping a log of households that were not eligible. Such
 documentation would show a monitor/auditor that the time spent by personnel is reasonable,
 particularly in periods of very low number of eligible households being served but with a high
 level of salaries. This practice is recommended for any activities that might result in a low
 amount of assistance delivered, as it would demonstrate the program is incurring legitimate
 costs for the program.

8.4.1.1 DOCUMENTATION COLLECTION

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

The only exception to the above policy is with regard to disability documentation; disability documentation <u>must</u> be collected within 45 days of program enrollment. If it is not obtained at enrollment, staff should record their observation of the disability and begin working to collect documentation immediately.

8.4.2 METRICS

Catagory	Metric
Category	All Funding Sources
	Percentage of housing program vacancies filled by Coordinated Entry (CE)

	Percent of vacancies made available for households meeting chronically homeless criteria
	Percentage of accepted referrals from CE
	Average length of time for move in from entry date
	Percentage of households housed twelve (12) months or longer
PSH Program	Percentage of household exits to other Permanent Housing
Outcomes	Percent of vacant PSH beds made available for chronically homeless, either vacancies due to unit turnover or lease-up of units in new projects
	Households who successfully exit PSH and return to homelessness within a twelve (12) month period
	Percentage of households that maintain or increase their income through any source from program entry to exit
Data Collection and	Percentage of HMIS data that is complete and accurate
Reporting	Percentage of HMIS data that is entered within 5 days from initial collection
Contract	Percentage expenditure of funds
Management	Percentage of Contract Payment Requests submitted accurately and on time

8.5 ELIGIBLE ACTIVITIES

8.5.1 ELIGIBLE ACTIVITIES OVERVIEW

Funds may be used to provide housing navigation and identification, rental assistance, and housing stabilization and case management services to help participants maintain permanent housing and achieve housing stability. Eligible cost categories are included in the table below.

Permanent Supportive Housing	СНС	CHG-CHF	DRF
ELIGIBLE ACTIVITIES			
Rental Assistance – Scattered Site Programs			
Rent Payments			
Rental Assistance – for profit, non-profit, gov't. Including:	х	х	х
Rental Arrears, including associated late fees	Х	х	х
Lot rent for RV or manufactured home	Х	Х	Х
Utilities, when included in rent	Х	Х	Х
Other fees, when included in rent Landlord Incentive	Х	Х	Х
Reimbursement for damages paid to a landlord	Х	Х	Х
Hotel/Motel	Х	Х	Χ
Parking Space Connected to Unit	Х	Х	Х
Security Deposits	Х	Х	Х
Last Month's Rent		Х	Х
Other Costs Associated with Rent			
Credit Checks		Х	Х
Housing Application Fees		Х	Χ
Legal fees and fines			Χ
Moving Costs			Χ
Storage Costs			Х
Utility Assistance/Deposits		Х	Х
Utility Arrears		Х	Х
Project Operations			
Costs Associated with Payroll			
Housing Search and Placement		Х	Х
Housing Stability Case Management		Х	Х
HMIS Data Collection and Entry		Х	Х
Sub-Contracted Services		Х	Χ
Supportive Service Costs			
Child Care			Х
Credit Repair - budgeting/money management			Х
Education Services			Х

Permanent Supportive Housing	СНС	CHG-CHF	DRF
Employment Assistance			Х
Legal Services			Χ
Life Skills			Х
Mediation			Х
Mental Health Services			Х
Outpatient Health Services			Χ
Substance Abuse Treatment Services			Χ
Transportation	Х	Х	Х
Other Program Costs			
General Liability Insurance	Х	Х	Χ
Office Internet	Х	Х	Χ
Office Space	Х	Х	Χ
Office Supplies	Х	Х	Х
Office Utilities	Х	х	Х
Staff Training/Conference/Per Diem	Х	х	Х
Sub-Leased or Leased Unit Turn-over			Х
Sub-Leased Unit Damages (during tenancy)			Х
Telephone	Х	Х	Х
Facility Support – Site Based Programs			
Lease Payments			
Lease/Rent on Facility	Х	х	Х
Hotel/Motel	Х	х	Х
Move-in Costs to Permanent Housing	Х	х	Х
Other Facility Costs			
Facility Equipment and Supplies	Х	х	Х
Facility Janitorial	Х	х	Х
Facility Maintenance/Repair	Х	х	Х
Facility Security	Х	Х	Х
Food served in Facility	Х	Х	Х
Off-Site and Residential Facility Management Fees	Х	Х	
Other Costs to Secure Permanent Housing	Х	Х	Х
Property Insurance	Х	Х	Х
Utilities	Х	Х	Х
Administrative Expenses			
Advertising			Х
Communications			Х
Facilities Maintenance & Repairs			Х
Insurance			Х
	1	l	

Permanent Supportive Housing	CHG	CHG-CHF	DRF
IT Support, Software, Computer Equipment			х
Machinery & Equipment			х
Office & Operating Supplies			Х
Personnel Salaries & Benefits			Х
Professional Services			Х
Public Utilities			Х
Small Tools & Minor Equipment			Х

8.5.2 DETAILED ELIGIBLE ACTIVITIES: SPECIFIC TO FUNDING SOURCE

8.5.2.1 CHG-FUNDED PERMANENT SUPPORTIVE HOUSING ELIGIBLE EXPENSES

Detailed explanation of eligible CHG-funded Permanent Supportive Housing activities are summarized in the table below. This includes both CHG Standard funds and CHG-CHF funds.

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
 - o **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

- **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

Facility Support

Lease Payments

- Lease/Rent on Facility: Cost of lease/rent for a facility used as permanent supportive housing.
- Hotel/Motel: When used as shelter or waiting for an HQS inspection on a unit.
- **Move-in Costs to Permanent Housing:** Cost of security deposit, first/last month's rent to secure a permanent housing unit

Other Facility Costs

- **Facility Equipment and Supplies:** Essential items for the operation of permanent supportive housing such as common-use toiletries, bedding, mats, cots, towels, microwave, etc.
- Facility Janitorial: Salaries and benefits associated with providing building janitorial services
- Facility Maintenance and Repairs: Includes janitorial/cleaning supplies, pest control, fire safety, materials and contract or staff maintenance salaries/benefits associated with providing the maintenance, mileage for maintenance staff
 - Maintenance activities include cleaning activities, protective or preventative measures to keep a building, its systems and its grounds in working order and replacement of existing appliances or objects that are not fixtures or part of the building. Maintenance activities should fix, but not make improvements that would add value to the building
 - Maintenance activities do not include the repair or replacement of fixtures or parts of the building. A fixture is an object that is physically attached to the building and cannot be removed without damage to the building. Fixtures also include, but are not limited to kitchen cabinets, built-in shelves, toilets, light fixtures, staircases, crown molding, sinks, and bathtubs. Maintenance activities do not include the installment or replacement of systems designed for occupant comfort and safety such as HVAC, electrical or mechanical systems, sanitation, fire suppression, and plumbing.
- Facility Security: Salaries and benefits associated with providing building security
- Food Served in Facility
- Off-site and Residential Facility Management Fees: Related to the operation of permanent supportive housing
- Other Costs to Secure Permanent Housing: Includes application fees, background checks, credit check fees, utility deposits, and costs of urinalyses for drug testing of household members if necessary/required for housing
- **Property Insurance:** For the permanent supportive housing building (mortgage insurance is not eligible)
- **Transportation to the Facility:** Directly related to the transportation of eligible households (bus tokens/tickets, fuel for shelter van)
- Utilities: Includes gas/propane, phone, electric, internet, water and sewer, garbage removal

8.5.2.2 DRF-FUNDED PERMANENT SUPPORTIVE HOUSING ELIGIBLE EXPENSES

Eligible DRF-funded Permanent Supportive Housing 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 – Scattered Site Projects ONLY

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 preapproval
- Landlord Incentives: paid to landlords, including:
 - o 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 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
- **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 – All activities below MUST be directly related to a household's ability to obtain or maintain permanent housing.

- **Child Care:** The costs of establishing and operating childcare, and providing childcare vouchers, for children from families experiencing homelessness, including providing meals and snacks, and comprehensive and coordinated developmental activities, are eligible.
 - The childcare center must be licensed by the jurisdiction in which it operates in order for its costs to be eligible.
 - Children must be under the age of 13, unless they are disabled children. Disabled children must be under the age of 18.
- Credit Repair: including budgeting or money management
- Education Services: The costs of improving knowledge and basic educational skills are eligible.
 Services may include instruction or training in consumer education, health education, substance abuse prevention, literacy, English as a Second Language, and General Educational Development (GED).
 - Component services or activities are screening, assessment and testing; individual or group instruction; tutoring; provision of books, supplies, and instructional material; counseling; and referral to community resources.
- Employment Assistance: The costs of establishing and operating employment assistance and job training programs are eligible, including classroom, online and/or computer instruction, on-the-job instruction, services that assist individuals in securing employment, acquiring learning skills, and/or increasing earning potential. The cost of providing reasonable stipends to participants in employment assistance and job training programs is also an eligible cost.
 - Learning skills include those skills that can be used to secure and retain a job, including the acquisition of vocational licenses and/or certificates. Services that assist individuals in securing employment consist of:
 - Employment screening, assessment, or testing
 - Structured job skills and job-seeking skills
 - Special training and tutoring, including literacy training and pre-vocational training
 - Books and instructional material

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

Other Program Costs

- **General Liability Insurance**: also includes automobile insurance
- Office Internet, Space, Supplies, Utilities, and Phone: when directly attributable to the project
 - Office supplies are items that aid in the short-term operation of your organization. These
 items usually need to be refilled or replaced. These include items such as printer ink, paper
 clips, paper, pens, staples, record keeping supplies, janitorial supplies, break room supplies,
 etc.
- Training or Conferences: related to service delivery, including travel and per diem
- **Sub-Leased or Leased Unit Turn-Over:** In scattered-site PSH projects wherein master-leases are utilized, and participants have a sub-lease and the participant vacates the unit, but the project will continue its master lease OR if the master-leased unit is being released, the following costs are eligible:
 - Carpet cleaning
 - Painting the unit

- Minor repairs to the unit
- Sub-Leased Unit Damages (during tenancy): In scattered-site PSH projects, wherein unit damages
 occur during tenancy that are outside normal wear-and-tear (i.e., the landlord's responsibility to
 repair) and would prevent the unit from passing a subsequent HQS inspection, funds may be used
 to make minor damage repairs.
- Other costs as approved by the County.

Facility Support – Site Based Projects ONLY

Lease Payments

- Lease/Rent on Facility: Cost of lease/rent for a facility used as permanent supportive housing.
- Hotel/Motel: When used as shelter or waiting for an HQS inspection on a unit.
- Move-in Costs to Permanent Housing: Cost of security deposit, first/last month's rent to secure a
 permanent housing unit
- Other costs: as approved in advance by the County

Other Facility Costs

- **Facility Equipment and Supplies:** Essential items for the operation of permanent supportive housing such as common-use toiletries, bedding, mats, cots, towels, microwave, etc.
- Facility Janitorial: Salaries and benefits associated with providing building janitorial services
- Facility Maintenance and Repairs: Includes janitorial/cleaning supplies, pest control, fire safety, materials and contract or staff maintenance salaries/benefits associated with providing the maintenance, mileage for maintenance staff
 - Maintenance activities include cleaning activities, protective or preventative measures to keep a building, its systems and its grounds in working order and replacement of existing appliances or objects that are not fixtures or part of the building. Maintenance activities should fix, but not make improvements that would add value to the building
 - Maintenance activities do not include the repair or replacement of fixtures or parts of the building. A fixture is an object that is physically attached to the building and cannot be removed without damage to the building. Fixtures also include, but are not limited to kitchen cabinets, built-in shelves, toilets, light fixtures, staircases, crown molding, sinks, and bathtubs. Maintenance activities do not include the installment or replacement of systems designed for occupant comfort and safety such as HVAC, electrical or mechanical systems, sanitation, fire suppression, and plumbing.
- Facility Security: Salaries and benefits associated with providing building security
- Food Served in Facility
- Off-site and Residential Facility Management Fees: Related to the operation of permanent supportive housing
- Other Costs to Secure Permanent Housing: Includes application fees, background checks, credit check fees, utility deposits, and costs of urinalyses for drug testing of household members if necessary/required for housing
- **Property Insurance:** For the permanent supportive housing building (mortgage insurance is not eligible)
- Transportation to the Facility: Directly related to the transportation of eligible households (bus tokens/tickets, fuel for shelter van)
- Utilities: Includes gas/propane, phone, electric, internet, water and sewer, garbage removal
- Other costs: as approved in advance by the County

Administrative Expenses

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

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

8.5.3 INDIRECT COSTS

Indirect costs eligibility varies by funding source. Indirect costs are eligible within DRF 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 <u>2 CFR 200.413</u> and <u>200.414</u>. 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 <u>2 CFR 200.414(f)</u>. Service providers may not apply indirect costs to rental assistance or leasing costs.

8.5.4 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.

8.6 ADDITIONAL RESOURCES

8.6.1 RELATED MANUALS AND RESOURCES

Resource	Link
Washington State Department of	https://www.commerce.wa.gov/serving-
Commerce 2019 Consolidated	communities/homelessness/consolidated-homeless-grant/
Homeless Grant Guidelines	
Rent Reasonableness & FMR Guide	https://files.hudexchange.info/resources/documents/CoC-
	Rent-Reasonableness-and-FMR.pdf
SAMHSA's 10 Guiding Principles of	https://store.samhsa.gov/sites/default/files/d7/priv/pep12-
Recovery	recdef.pdf
HUD Resource page on Chronic	https://www.hudexchange.info/homelessness-
Homelessness	assistance/resources-for-chronic-homelessness/
Defining "Chronically Homeless"	https://www.hudexchange.info/resource/4847/hearth-
Final Rule	defining-chronically-homeless-final-rule/
Flowchart of HUD's Definition of	https://www.hudexchange.info/resource/5181/flowchart-of-
Chronic Homelessness	huds-definition-of-chronic-homelessness/
Sample Chronic Homelessness	https://www.hudexchange.info/resource/5182/sample-
Documentation Checklist	chronic-homelessness-documentation-checklist/

8.6.2 REQUIRED FORMS

Form	Appendix Item	
Rent Reasonableness Checklist and Certification Form	B-3	
CHG-Funded Programs Where appropriate, CHG forms may be utilized with other funding sources.		
CHG Verification of Household Eligibility and Income Recertification Form	C-2	
CHG Income Eligibility Worksheet	C-3	
CHG Self-Declaration of Housing Status and No Income Form	C-5	
CHG Utility-Only Assistance Form	C-14	

8.6.3 REFERENCED APPENDICES

Item	Appendix Item
HQS Pre-Inspection Checklist	B-2
Chronically Homeless Documentation Resource	C-23