



HOMELESS HOUSING PROGRAM POLICY AND OPERATIONS MANUAL

CHAPTER 1: INTRODUCTION AND UNIVERSAL POLICIES

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CHAPTER 1: INTRODUCTION AND UNIVERSAL POLICIES

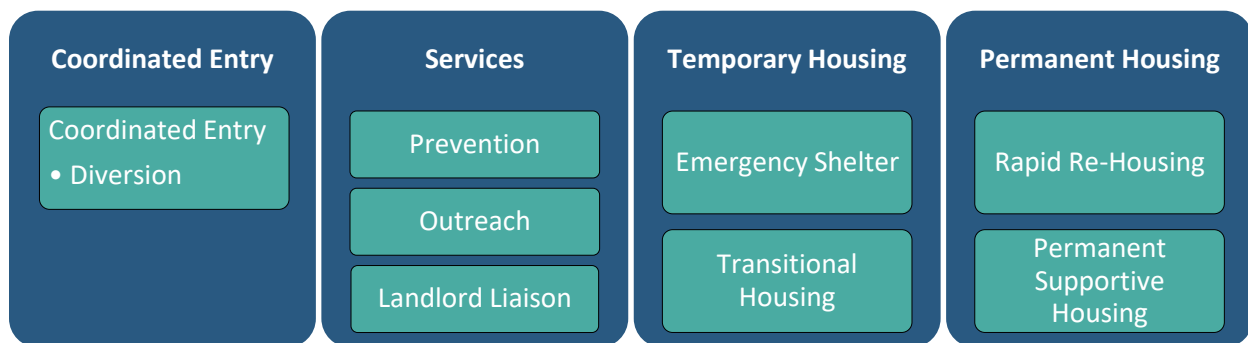
1.1 OVERVIEW OF THE POLICY AND OPERATIONS MANUAL

1.1.1 PURPOSE OF THE MANUAL

This Policy and Operations Manual is designed to provide policy guidance and written standards for the Homeless Crisis Response System (HCRS)'s major components (listed below). This guidance is applicable to all Pierce County Human Service's Homeless Housing Program service provider partners.

The Manual supports Pierce County's vision of a service delivery system in which all participants utilize best practices, comply with funding requirements, and collaborate to achieve the prevention and elimination of homelessness in Pierce County.

The Manual includes policies and standards for all major components of Pierce County's unified HCRS, including:



For each component, the Manual includes the following:

1. **Overview of the Component**, including its definition, goals and objectives, and relation to Coordinated Entry.
2. **Eligibility and Typical Service Flow**
3. **Policies and Standards**
4. **Performance Measurement Expectations**, including data collection requirements and metrics.
5. **Eligible Activities**, including eligible expenses.
6. **Additional Resources** such as required forms, template form content, and resource links.

A glossary of common terms and acronyms that appear throughout this Policy and Operations Manual may be found in Appendix A-1.

Service providers receiving the sources identified in Section 1.1.2 should also reference the following companion documents for additional policies and procedures applicable to agencies within the HCRS:

- ***Homeless Management Information System (HMIS) Policy & Procedure Manual***: Policies and procedures related to HMIS and data input
- ***Pierce County Homeless Programs Monitoring Guide***: Policies and procedures for service provider monitoring

1.1.2 REQUIRED PARTICIPATION

The Homeless Housing Program Policy and Standards Manual applies to all programs contracted to provide services with the fund sources identified in the table below.

Federal (HUD) Funding
Emergency Solutions Grant (ESG)
State Department of Commerce Funding
Emergency Solutions Grant (ESG) – State Allocation
Consolidated Homeless Grant (CHG)
Consolidated Homeless Grant Housing and Essential Needs (CHG-HEN)
Consolidated Homeless Grant for Chronically Homeless Families (CHG-CHF)
Consolidated Homeless Grant for Hotel Shelter, Rapid Re-Housing & Outreach (CHG-HRO)
Local Funding
Homeless Document Recording Fee (DRF)
Tacoma Housing Authority (THA) Grant

1.1.3 ANNUAL MONITORING

All service providers funded with the sources identified in Section 1.1.2 are subject to annual monitoring by the Pierce County Human Services Department (PCHS) for compliance with the written standards, policies, and procedures in this Operations and Standards Manual. Service providers should also reference The Pierce County Homeless Programs Monitoring Guide for related policy and procedure requirements.

Service providers will be notified 30 days in advance, in writing, of an upcoming monitoring visit. Any findings or concerns will be provided to the agency, in writing, and the agency will have 30 days to provide written feedback which must include a plan to address any findings or concerns.

1.1.4 REVISIONS AND AMENDMENTS

Pierce County Human Services may change applicable program requirements, policies, and guidance from time to time to meet program objectives, maximize achievement of system outcomes, and maintain alignment with funder requirements¹. PCHS is responsible for the review and revision of all policies and standards within the Policy and Standards Manual. The revision process will be completed at least once annually with input solicited from providers, community partners, and consumers via an open-invite forum. Pierce County Human Services serves as the approval body for the final version of policies and standards.

The latest version of the Policy and Standards Manual is publicly viewable by visiting <https://www.piercecountywa.gov/4812/Reports-Plans-and-Policies>. A history of revisions to the Manual are listed in the table below.

¹ ESG requirement

Revision Date	Document Section Name	Revision Description
May 2022	1.3.5 Required Data Collection and Documentation	Added documentation of background check requirement.
June 2023	1.3.2.1 Confidentiality	Added confidentiality language required by the Department of Commerce.

1.2 OVERVIEW OF THE CONTINUUM OF CARE

1.2.1 VISION

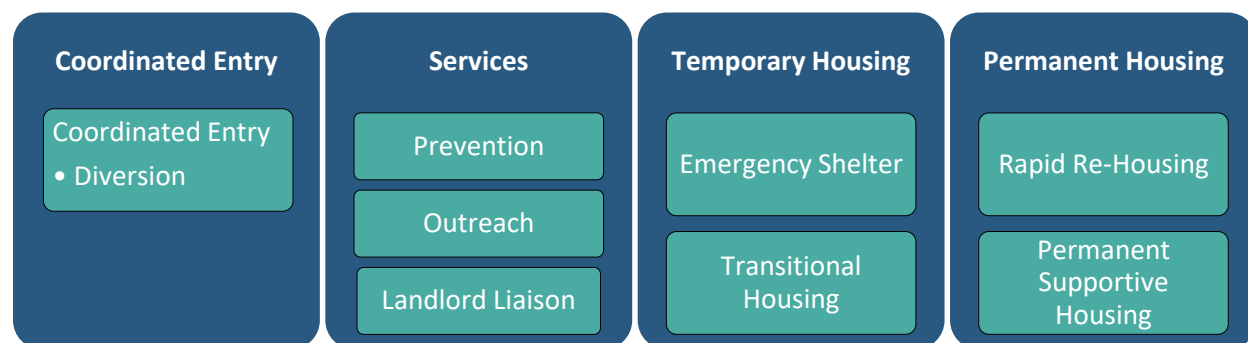
Ending homelessness is one of the most challenging tasks Pierce County and counties all over the nation face. The causes of homelessness are complex and many, influenced by societal, structural, legal, personal, and many other factors that are extremely difficult to transform. Despite the overwhelming challenges, Pierce County has resolutely pursued new solutions to help people experiencing homelessness become stable and rehoused as quickly as possible.

In 1997, The Road Home CoC was established as the county's unified and coordinated HCRS for families and individuals experiencing homelessness. The Road Home CoC's mission is to promote community wide commitment to ending homelessness through policy and resource alignment by implementing activities to achieve the goals and objectives of the [Five Year Plan to End Homelessness](#).

The ultimate vision of The Road Home CoC is to make the experience of homelessness in Pierce County rare, brief and non-recurring. The goal is an integrated, adaptable, and responsive network of services that supports stability and self-determination for everyone—regardless of economic or social circumstances, and regardless of where in our community they live. The CoC values collaboration, compassion, and equity. It embraces a “Housing First” approach to ending homelessness by first helping people find or maintain permanent housing and then connecting them with community, health, human, and financial services they need to maintain housing stability.

1.2.2 SYSTEM COMPONENTS

The major components of the Homeless Crisis Response System include:



Coordinated Entry

Coordinated Entry makes it easier for people experiencing homelessness to access housing and supportive services, when available, and connects them to other mainstream services available in the community. When a person experiencing homelessness reaches out for help, Coordinated Entry uses a uniform assessment to determine his/her eligibility for homeless programs, vulnerability to imminent harm and barriers to housing. Through Coordinated Entry, a single database keeps track of the available program availabilities throughout the community to identify the best program available for each person.

Diversion

It can be an uphill battle to exit any length of homelessness. Diversion, or short-term problem-solving techniques, make homelessness brief by meeting a housing crisis head on with the creativity and

resources of the person experiencing the crisis. By helping them to leverage their natural resources—their family, friends, and faith communities—people can find housing solutions at a critical moment. And by supporting them with limited financial assistance, such as a one-time bill payment, help purchasing food, help finding a job or addressing health and safety needs, problem-solving assistance can provide support to help them stay housed.

Prevention

The Prevention component of the HCRS provides assistance to individuals and families who are at-risk of homelessness to avert experiences of literal homelessness. The types of assistance provided through Prevention can include housing relocation services, housing stabilization services, and short- and/or medium-term rental or housing-related financial assistance.

Outreach

Outreach services are critical for identifying and addressing the immediate need of persons and families experiencing homelessness, especially those who are unable or unwilling to accept Emergency Shelter services. Outreach services include connecting people to behavioral health services, such as recovery programs or mental health services and Coordinated Entry, as well as helping people to meet their most basic needs of food, clothing and medical care.

Landlord Liaison Services

Landlord Liaison services partner with property owners and homeless service providers, acting as a bridge to connect those experiencing homelessness with vacant units in the community. Property Partners agree to apply relaxed screening criteria to tenant applicants referred for housing through this program and in return, they receive a variety of incentives. Tenants receive housing stabilization services and good renter training/certification to help mitigate evictions and increase housing stability long-term.

Emergency Shelter

Emergency Shelters work to make homelessness brief by providing respite and serving as a site for people to connect to stable housing and support resources. Shelters provide a safe place to sleep indoors and act as an entry point to services that help people identify permanent housing, connect with employment opportunities, or access other needed health and support services.

Transitional Housing

Transitional Housing provides individuals and families experiencing homelessness with the interim stability and support to successfully move into and maintain a permanent housing solution. These programs are limited to households that, due to a disability or other factors (such as engagement with the family welfare system), need temporary housing that permits stays longer than Emergency Shelter.

Rapid Re-Housing

Rapid Re-Housing moves people quickly from homelessness to housing by providing short-term rental assistance accompanied by support services such as housing search assistance, move in costs, connection to mainstream services such as behavioral health or employment training programs and on-going case management for housing stability support. In Rapid Re-Housing, graduated services and rent support are offered to help stabilize people in their housing and prevent them from becoming homeless again.

Permanent Supportive Housing

Permanent Supportive Housing can provide a stable living situation to people with significant barriers to housing, such as a long history of homelessness or a disability. Housing is paired with access to long-term supportive services—including mental and physical health services, substance use recovery, and vocational training—helping people to stay housed.

1.2.3 POLICY PRIORITIES

The CoC has shifted to an HCRS to better serve families and individuals experiencing homelessness. The HCRS aligns with the HUD Policy Priorities below.

End Homelessness for All Persons

- Identify, engage, and effectively serve all populations experiencing homelessness
- Measure performance with local data, taking into account unique challenges of sub-populations
- Use a comprehensive Outreach strategy to identify and continuously engage all unsheltered individuals and families
- Interpret local data to determine the characteristics of households with highest needs and longest experiences of homelessness to develop housing and supportive services tailored to their needs

Create a Systemic Response to Homelessness

- Measure HCRS performance
- Use Coordinated Entry to coordinate homelessness response assistance and mainstream housing/services to ensure assistance is received quickly
- Promote participant choice
- Make delivery of homeless assistance more open, inclusive, and transparent

Strategically Allocate Resources

- Use cost, performance, and outcome data to improve how resources are utilized to end homelessness
- Review project quality, performance, and cost effectiveness
- Maximize use of mainstream and other community-based resources
- Review eligible renewal projects to determine effectiveness in service and cost effectiveness

Use a Housing First Approach

- Use data to quickly and stably house persons experiencing homelessness and to measure and help projects reduce the length of time people experience homelessness
- Engage property owners
- Remove barriers to entry
- Practice participant-centered service methods

1.2.4 ROLES WITHIN THE CONTINUUM OF CARE

The Road Home CoC Oversight Committee was established to oversee community planning to address issues of homelessness in Pierce County. The CoC Board increases public awareness of the community's Plan to End Homelessness, engages community partners to implement the Plan, ensures the CoC is in compliance with the HEARTH Act, and creates and sustains implementation strategies to facilitate the

prevention and resolution of homelessness in Pierce County. CoC Committees, Sub-committees, Work Groups, and Ad Hocs also convene as needed for planning and implementation efforts.

As the designated Lead Agency for The Road Home CoC, PCHS is responsible for leadership and oversight of contracts, programs, policies, procedures, compliance, communications, community outreach, training, planning, budgeting, strategy, interdepartmental collaboration, and cross-sector partnership development. PCHS also manages the Homeless Management Information System (HMIS), The Road Home CoC's unified data system and serves as the CoC's HMIS Data Lead.

1.3 UNIVERSAL POLICIES AND STANDARDS

The following principles, policies, and standards apply to all programs in HCRS, regardless of program type or funding source.

1.3.1 CORE SYSTEM APPROACHES

Person-Centered

People experiencing homelessness are centered in the design and implementation of the HCRS and its programs. The design of the system and its components should reflect the input of people with lived experience of homelessness.

Equity-Informed

The CoC's guiding principles include a commitment to exercising racial equity, diversity and inclusion – with shared power and vision in all decisions and practices by the CoC Committee and all funding entities – to create an equitable service delivery system to prevent and eliminate homelessness in Pierce County.

Housing First

In Housing First approaches, all people are assumed to be “housing ready” and are not required to participate in services or agree to treatment as a condition of receiving service. All HCRS partner programs must operate using a Housing First philosophy where barriers to program entry are reduced, minimal eligibility criteria are utilized, and service participation requirements as a condition of entering housing are avoided. Under this approach, only eligibility criteria imposed by a funding source are permitted.

Trauma-Informed

Programs within the HCRS are committed to utilizing trauma-informed, strengths-based approaches to create safe, supportive, and respectful relationships with, or environments for, people experiencing homelessness. Trauma-informed approaches focus on safety, empowerment, transparency, and collaboration.

Progressive Engagement

A nationally recognized best practice, progressive engagement provides tailored levels of assistance. Services are initially offered at a low (or light) intensity, adapting as needed, to a level and intensity responsive to each person's or household's individual needs.

Harm Reduction

Principles of harm reduction are applied throughout services offered to people experiencing homelessness. Service providers understand the value in a reduction of negative health behaviors, even in the absence of complete elimination or abstinence of the behavior and employ strategies to meet people “where they are.”

1.3.2 POLICIES AND STANDARDS

Programs are governed by an array of federal, state, and local regulations. While all agencies are expected to comply with the following regulations in the table below, this is not an exhaustive list; it is the responsibility of each individual service provider to ensure they are in compliance with all applicable

federal, state, and local regulations. In instances where regulations overlap, service providers must comply with the more stringent of the applicable regulations.

Regulation	Title
2 CFR 200	Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards
24 CFR 5	Equal Access in Accordance with an Individual's Gender Identity in Community Planning and Development Programs
24 CFR 84	Uniform Administrative Requirements for Grants and Agreements with Institutions of Higher Education, Hospitals, and Other Non-Profit Organizations
24 CFR 100	Discriminatory Conduct Under the Fair Housing Act
24 CFR 576	Emergency Solution Grants Interim Rule
24 CFR 578	Continuum of Care (CoC) Program Interim Rule
42 U.S.C. 11381-11389	McKinney-Vento Homeless Assistance Act, as amended by the HEARTH Act
HUD Prioritization Notice CPD-16-11	Notice on Prioritizing Persons Experiencing Chronic Homelessness and Other Vulnerable Homeless Persons in Permanent Supportive Housing
HUD Coordinated Entry Notice CPD-17-01	Notice Establishing Additional Requirements for a Continuum of Care Centralized or Coordinated Assessment System
Notice H 2017-05	Violence Against Women Act Reauthorization of 2013

Service providers must have policies and procedures in place for all funded programs and must be in alignment with all published Pierce County Human Services' policies. When there is a conflict between the service provider policy and the PCHS policies, the PCHS policy will prevail.

1.3.2.1 CONFIDENTIALITY

"Confidential Information" as used in this section includes:

1. All material provided to the service provider by Pierce County or its funders that is designated as "confidential" by the County or its funder
2. All material produced by the service provider that is designated as "confidential" by the County or its funder
3. All personal information in the possession of the service provider that may not be disclosed under state or federal law.

Service providers shall comply with all state and federal laws related to the use, sharing, transfer, sale, or disclosure of Confidential Information. Service providers shall use Confidential Information solely for the purposes of implementing a program and shall not use, share, transfer, sell or disclose any Confidential Information to any third party except with the prior written consent of Pierce County or as may be required by law. Service providers shall take all necessary steps to assure that Confidential Information is safeguarded to prevent unauthorized use, sharing, transfer, sale or disclosure of Confidential Information or violation of any state or federal laws related thereto. Upon request, service providers shall provide the County with its policies and procedures on confidentiality.

The County may require changes to such policies and procedures as they apply to program implementation with funds awarded from the County whenever the County reasonably determines that changes are necessary to prevent unauthorized disclosures. Service providers shall make the changes

within the time period specified by Pierce County. Upon request, service providers shall immediately return to Pierce County any Confidential Information that the County reasonably determines has not been adequately protected by the service provider against unauthorized disclosure.

UNAUTHORIZED USE OR DISCLOSURE

Service providers shall notify the County within five (5) working days of any unauthorized use or disclosure of any Confidential Information and shall take necessary steps to mitigate the harmful effects of such use or disclosure.

1.3.2.2 FRAUD AND OTHER LOSS REPORTING

Service providers must inform the County in writing of all known or suspected fraud or other loss of any funds or other property furnished under the fund sources included in this Policy Manual. Reasonable attempts must be made to prevent fraud and ineligible use of funds.

1.3.3 CONFLICTS OF INTEREST

Service providers must avoid any conflict of interest in carrying out activities funded by PCHS.

1.3.3.1 AVOIDANCE OF ORGANIZATIONAL AND INDIVIDUAL CONFLICTS

ORGANIZATIONAL CONFLICTS OF INTEREST

The provision of any type or amount of assistance may not be conditioned on an individual's or family's acceptance or occupancy of Emergency Shelter or housing owned by the service provider, or a parent or subsidiary of the service provider.

Service providers must not conduct initial evaluation or provide Homelessness Prevention Assistance to persons living in property owned by the service provider or parent/subsidiary of the service provider.

INDIVIDUAL CONFLICTS OF INTEREST

For procurement of goods and services, service providers must comply with HUD's Administrative Requirements regulations. For all other transactions and activities:

- Restrictions on financial interests and benefits apply to employees, agents, consultants, officers, and elected or appointed officials of the service provider if they have certain types of responsible positions.
- Restrictions pertain to financial gain for self, family, or those with business ties.

1.3.3.2 REQUEST FOR EXCEPTIONS

HUD may grant an exception to the provisions of this subsection on a case-by-case basis, taking into account the cumulative effects of the criteria in HUD's Factors to be Considered for Exceptions ([24 CFR 576.404\(b\)\(3\)\(ii\)](#)), provided that the County has satisfactorily met the threshold requirements. To seek an exception, contact the County in writing, to discuss whether your agency/situation may be eligible. For more information on HUD's Conflict of Interest policy, please see [24 CFR 576.404](#).

1.3.4 REQUIRED PROGRAM POLICIES

1.3.4.1 REQUIRED ENTRY AND ELIGIBILITY CRITERIA

To ensure that all projects are available to adopt Housing First approaches and serve higher need households to the maximum extent possible, all PCHS-funded projects are required to remove barriers to entry. This includes ensuring program eligibility criteria do not restrict participation based on disallowed criteria. The table below highlights disallowed eligibility criteria.

Criteria Type	Service Provider Eligibility Expectations
Household type and composition	May not restrict based on: <ul style="list-style-type: none"> • Gender of adults or children (except if required based on facility configuration) • Age of children in household with adults and children • Gender identity or orientation • Any other protected class
Homeless Status	May not screen out people experiencing literal homelessness
Residency	For projects serving HUD's Homeless Categories 1 and 4, unless funder required, may not restrict admission to last known address in Pierce County or last known address in particular area of the County. For projects serving At-Risk of Homelessness, residency may be restricted to Pierce County or according to funder requirements.
Disability	May not deny admission based on having a disability (e.g., "not employable").
Domestic Violence	May not deny admission based on experience of Domestic Violence.
Income	May not restrict based on minimum income or income source.
Employment	May not restrict admission based on current employment status, employability or history of employment, or willingness to pursue employment.
Education	May not restrict admission based on being a current full-time or part-time student or willingness to pursue education.
Criminal Background	May not restrict based on any criminal background except those specifically required by funder.
Sobriety	May not restrict based on current sobriety, length of sobriety, or results of UI test.
Rental and Credit History	May not restrict based on past evictions, having no rental history, or poor credit history.
Service Participation	May not restrict based on willingness to participate in: case management; mental health services or counseling; substance abuse treatment or counseling; goal setting or service planning; or any other mandated services.
Pets	Housing projects (non-congregate) may not restrict pets unless they receive a waiver.

Imposed eligibility criteria beyond those criteria specified for each program component in this Manual must be funder required or in alignment with the allowable criteria outlined in the table below. Note that these allowable criteria should only be considered in instances in which it is required to best serve participants (e.g., restricting admission to victims of domestic violence to preserve safety and confidentiality) and/or required by the funder. All service providers should align with Housing First and low barrier entry criteria to the maximum extent possible.

Criteria	Service Provider Allowable Eligibility Criteria ONLY If Funder or Targeted Population is Required
Household type and composition	May restrict based on household type (transition age youth, single adult, family) or household size.
Homeless Status	May restrict admission to people experiencing literal homelessness, chronic homelessness, or meeting HUD's Category 4 definition of homelessness (persons fleeing or attempting to flee domestic violence).
Residency	For projects serving HUD's Homeless Categories 1 and 4, may be imposed only if funder required. For projects serving At-Risk of Homelessness, may be restricted Pierce County or according to funder requirements.

Criteria Service Provider Allowable Eligibility Criteria ONLY If Funder or Targeted Population is Required	
Immigration Status	May be imposed only if funder required.
Veteran Status	May restrict admission to Veterans. May only consider discharge status if funder required.
Disability	May limit admission to people with a specific qualifying disability.
Income	May restrict based on maximum income.
Criminal Background	If funder required or on project case-by-case basis, may restrict based on the following convictions: violent felony, sex offender registration, arson, drug manufacturing.
Pets	Congregate settings may restrict pets, other projects must receive waiver from PCHS.

1.3.4.2 TERMINATION OF PARTICIPATION

Service providers must have written termination policies and/or procedures. The policies and/or procedures should be readily available to households either in written format or by posting the policy in a public place. It is important to effectively communicate these policies and/or procedures to households and ensure that they are fully understood.

Causes for termination may include, but are not limited to, failure to abide by any agreed-upon requirements and participant fraud. A grievance/appeal procedure must include:

1. Written notice to the household containing a clear statement of the reasons for termination
2. A review of the decision, in which the household is given the opportunity to present written or oral objections before a person other than the person (or a subordinate of that person) who made or approved the termination decision. This may include the household's right to question or confront staff involved
3. Prompt written notice of the final decision.

1.3.4.3 DENIAL OF ASSISTANCE

Service providers must have written denial of assistance policies and/or procedures. The policies and/or procedures should be readily available to households either in written format or by posting the policy in a public place. It is important to effectively communicate these policies and/or procedures to households and ensure that they are fully understood.

Causes of denial of assistance include, but are not limited to, the household's ineligibility or failure to provide verifiable evidence of eligibility, etc. A grievance/appeal procedure must include:

1. Defined circumstances in which a household may not qualify or would be denied
2. Notification of denial
3. A household's right to review a decision made by either the service provider or Pierce County and a process by which they may do so

1.3.4.4 HOUSEHOLD AUTONOMY

Service providers must have written household autonomy policies and/or procedures. The policies and/or procedures should be readily available to households either in written format or by posting the policy in a public place. It is important to effectively communicate these policies and/or procedures to households and ensure that they are fully understood.

To ensure household choice and autonomy, households are allowed to refuse to answer any question asked of them and/or any form of assistance offered by a program. 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.

1.3.4.5 GRIEVANCE/APPEAL POLICY

Service providers must have written grievance/appeal policies and/or procedures. The policies and/or procedures should be readily available to households either in written format or by posting the policy in a public place. It is important to effectively communicate these policies and/or procedures to households and ensure that they are fully understood.

Should a household or another service provider have an unsatisfactory experience with a service provider, or a decision made by a service provider related to their level of assistance, that household and/or service provider is entitled to file a grievance/appeal. All grievances/appeals must be filed in writing.

A three-tiered grievances/appeals process must be in place to facilitate the review and ruling on a grievance an unsatisfactory decision. Grievances and appeals can be lodged within 14 days of the grievance or unsatisfactory decision.

Required Levels of Appeal	
Tier One	Review by a Program Manager or designee from the service provider agency who was not involved in the original decision-making process within two business days.
Tier Two	Review by an Executive Director or designee of the service provider agency within three business days.
Tier Three	Review completed by a designated representative from PCHS within three business days.

Households who submit a grievance or appeal must be notified of the outcome in writing within three business days of the final decision.

1.3.4.6 HABITABILITY STANDARDS

Federal regulations establish two different standards for assessing housing quality and ensuring a given unit meets a minimum level of safety and decency: Housing Habitability Standards and Housing Quality Standards. Housing Quality Standards established through the CoC program are more stringent than the Habitability Standard. All programs must adhere to one of these two standards.

Additional information regarding which Housing Habitability Standards, Housing Quality Standards, and Lead-Based Visual Assessment policies applicable to each program component can be found in their corresponding sections of the Manual.

1.3.5 REQUIRED DATA COLLECTION AND DOCUMENTATION

All programs must document background checks for all employees, volunteers, or interns who will or may have unsupervised contact with children or vulnerable adults.

1.3.5.1 HOMELESS MANAGEMENT INFORMATION SYSTEM UTILIZATION

All service providers are required to collect and enter program data into The Road Home CoC's Homeless Management Information System (HMIS). Data collection must be compliant with HUD's HMIS Data and Technical Standards Final Notice² and in accordance with the Pierce County HMIS Policies and Procedures Manual.

Additionally, all documentation for participants who consent to have their information entered into HMIS should be scanned and uploaded into HMIS. Service providers may elect to store participant files as electronic records only. If a participant is non-consenting, documentation shall be maintained in hard copy only and kept in a locked drawer behind a locked door. Non-personally identifying information for non-consenting participants may be entered into HMIS and the participant record should indicate staff name and contact information.

EXCEPTIONS

Domestic Violence service providers are specifically prohibited by the Violence Against Women's Act (VAWA) from disclosing, revealing, or releasing any personally identifying information about their participant. Therefore, such Domestic Violence service providers must enter all program information (including personally identifying information) into a separate, but comparable data system and not HMIS. This data system must be able to meet all HMIS Data Standards and the minimum standards of HMIS privacy and security requirements, including HUD's most recent reporting standards and comma separated value format specifications.

1.3.5.2 PRIVACY AND DATA SECURITY

Service providers must have policies and/or procedures to ensure that participant records are maintained in a confidential manner. Written records or files pertaining to households must be kept under lock and key with designated personnel granted access to those files³.

All service providers must comply with HUD's HMIS Data and Technical Standards Final Notice⁴ HMIS Privacy Standards 4.1 and in accordance with the Pierce County HMIS Policies and Procedures Manual. HMIS Lead Agency staff or designees will periodically monitor service provider compliance to ensure system-wide adherence to Governing Principles and Policies and Procedures of the Countywide Pierce County HMIS system.

1.3.5.3 HMIS RELEASES OF INFORMATION

Participants have the right to specify whether their personal information may be shared in the Pierce County HMIS system (or comparable database for Domestic Violence service providers). Participants may revoke, revise, and/or amend their levels of data sharing at any time during the course of service. Participants cannot be refused services if they do not consent to information sharing or choose to modify their participation in Pierce County HMIS (or comparable database for Domestic Violence service providers).

Further, participants in the following situations should not consent to release their information:

² <https://www.hudexchange.info/resource/1318/2004-hmis-data-and-technical-standards-final-notice/>

³ CHG Requirement

⁴ <https://www.hudexchange.info/resource/1318/2004-hmis-data-and-technical-standards-final-notice/>

- Participating in a Domestic Violence agency program or Shelter
- Currently fleeing or in danger from a domestic violence, dating violence, sexual assault, or stalking situation
- Being served in a program that requires disclosure of HIV/AIDS status (i.e., HOPWA)
- Under 13 years of age with no parent/guardian available to consent to sharing the minor's information in HMIS.

WRITTEN RELEASES OF INFORMATION

The standard expectation within HCRS is that service providers will collect written Releases of Information (ROI) forms from participating persons or households. ROIs should be obtained in writing when service providers meet with persons or households in person for services. Electronic signatures are also acceptable when meeting with the participant electronically or over the phone. For participants who consent to share their information, the signed ROI should be uploaded to the Participant Profile in HMIS.

A copy of the Participant Release of Information and Informed Consent Form is included in Appendix C-1. All participants must be provided with a copy of the Participant ROI and Informed Consent for their records.

VERBAL RELEASE OF INFORMATION

Exceptions to the Written Release of Information expectation may be made to allow collection of a verbal ROI, in exceptional and time-limited instances. In these instances, an entity may collect a verbal ROI by phone. The first time the service provider meets with the participant in-person, efforts must be made to collect a written ROI. If the service provider and participant do not meet in-person following the initial verbal ROI, the verbal ROI is sufficient; however, efforts should be made to collect an electronic signature, if possible.

1.3.5.4 DOCUMENTATION OF HOMELESSNESS

All service providers are required to document housing status eligibility for HCRS services. When documenting homelessness, staff should use the following methods, listed in HUD's preferred order:

- 1) Third-Party Verification**
 - a. Written
 - b. Oral
- 2) Intake Staff Observations**
- 3) Self-Certification**

A Third-Party Verification form and Self-Declaration form are provided by the State for use with CHG funds and are included in Appendix C-4 and C-5, respectively. These forms may be used as a template document for use with any other fund source. The following table outlines standards for this documentation, based on the housing status of the participant.

Category	Definition	Documentation Standards
Category 1	Literally Homeless	<ul style="list-style-type: none"> • Written observation by the Outreach worker; <u>or</u> • Written referral by another housing or service provider; <u>or</u>

		<ul style="list-style-type: none"> • Certification by the individual or head of household seeking assistance stating that (s)he/they was living on the streets or in Shelter • For individuals exiting an institution – one of the forms of evidence above, <u>and</u>: <ul style="list-style-type: none"> ○ Discharge paperwork <u>or</u> written/oral referral; <u>or</u> ○ Written record of intake worker's due diligence to obtain evidence <u>and</u> certification by individual that they exited institution
Category 2	Imminent Risk of Homelessness	<ul style="list-style-type: none"> • A court order resulting from an eviction action notifying the individual or family that they must leave; <u>or</u> • For individual and families leaving a hotel or motel – evidence that they lack the financial resources to stay; <u>or</u> • A documented and verified oral statement; <u>and</u> <ul style="list-style-type: none"> ○ Certification that no subsequent residence has been identified; <u>and</u> ○ Self-certification or other written documentation that the individual or family lack the financial resources and support necessary to obtain permanent housing
Category 4	Fleeing/ Attempting to Flee Domestic Violence	<ul style="list-style-type: none"> • For victim service providers: <ul style="list-style-type: none"> ○ An oral statement by the individual or head of household seeking assistance which states: they are fleeing; they have no subsequent residents; and they lack resources. Statement must be documented by a self-certification or a certification by the intake worker. • For non-victim service providers: <ul style="list-style-type: none"> ○ Oral statement by the individual or head of household seeking assistance that they are fleeing. This statement is documented by a self-certification or by the caseworker. Where the safety of the individual or family is not jeopardized, the oral statement must be verified; <u>and</u> ○ Certification by the individual or head of household that no subsequent residence has been identified; <u>and</u> ○ Self-certification, or other written documentation, that the individual or family lacks the financial resources and support networks to obtain other permanent housing.

1.3.6 REPORTING AND EVALUATION

Service Providers are expected to comply with the policies and standards included within this Manual, as well as specific terms outlined in contracts. This includes regular and accurate data collection and documentation related to program services and outcomes. PCHS conducts regular and ongoing monitoring and evaluations of service providers including quarterly reviews of program data, on-site monitoring, and administration of participant feedback surveys.

Service providers are expected to provide information as required by PCHS that demonstrates compliance with regulations, eligibility, and performance outcomes, including submission of any reports. Service providers are expected to collect data and seek opportunities to engage leadership in discussion to improve outcomes.

1.4 ADDITIONAL RESOURCES

1.4.1 RELATED MANUALS OR RESOURCES

Resource Name	Resource Link
Pierce County HMIS Systems Policy and Procedure Manual	https://www.piercecountywa.gov/4805/Homeless-Management-Information-System-H
Pierce County Homeless Programs Monitoring Guide	https://www.piercecountywa.gov/4812/Reports-Plans-and-Policies
2 CFR 200	Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards
24 CFR 5	Equal Access in Accordance with an Individual's Gender Identity in Community Planning and Development Programs
24 CFR 84	Uniform Administrative Requirements for Grants and Agreements with Institutions of Higher Education, Hospitals, and Other Non-Profit Organizations
24 CFR 100	Discriminatory Conduct Under the Fair Housing Act
24 CFR 576	Emergency Solution Grants Interim Rule
24 CFR 578	Continuum of Care (CoC) Program Interim Rule
42 U.S.C. 11381-11389	McKinney-Vento Homeless Assistance Act, as amended by the HEARTH Act
HUD Prioritization Notice CPD-16-11	Notice on Prioritizing Persons Experiencing Chronic Homelessness and Other Vulnerable Homeless Persons in Permanent Supportive Housing
HUD Coordinated Entry Notice CPD-17-01	Notice Establishing Additional Requirements for a Continuum of Care Centralized or Coordinated Assessment System
Notice H 2017-05	Violence Against Women Act Reauthorization of 2013

1.4.2 FORMS

Form	Appendix Item
Participant Release of Information and Informed Consent Form	Appendix C-1
CHG Third Party Verification Form (template)	Appendix C-4
CHG Self-Declaration Form (template)	Appendix C-5

1.4.3 REFERENCED APPENDICES

Item	Appendix Item
Glossary of Terms	Appendix A-1