

HOMELESS HOUSING PROGRAM POLICY AND OPERATIONS MANUAL

CHAPTER 5: EMERGENCY SHELTER

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CHAPTER 5: EMERGENCY SHELTER

5.1 OVERVIEW OF EMERGENCY SHELTER

5.1.1 **DEFINITION**

Emergency Shelter provides a short-term temporary place to stay for persons or households experiencing homelessness. The following are types of Shelter programs in Pierce County:

- Day Shelter: Facility that is open during regular day-time hours for the purpose of meeting basic needs for persons experiencing homelessness or connecting them to services. This includes food, respite, hygiene services, connection to Coordinated Entry (CE), referral to mainstream and supportive services, or problem solving to meet the person's housing needs, all while employing a housing first approach.
- 2. Same-Day (or Drop-in) Shelter: Facility with the primary purpose of providing short-term, temporary overnight Shelter for persons experiencing homelessness that does not require occupants to sign leases or occupancy agreements. Same-Day Shelters are those which offer facility-based, night by night, living arrangement that allows households to enter and exit on an irregular or daily basis. Same-Day Shelters are required to work collaboratively with the CE providers to support the provision of the CE activities on site including screening, Diversion, and Prioritization.
 - Safe Parking: A parking lot in which people experiencing homelessness are permitted to park and remain in their vehicle overnight without penalty. Security and hygiene stations may also be available at the site. Typically, no services are provided on-site, though street outreach may attempt to engage households in services.
 - Sanctioned Encampments: Outdoor camps in area approved by the jurisdiction and the landowner to host people experiencing homelessness in tents or some other temporary structure. Must include security, hygiene stations, and services provided by a non-profit organization. Sanctioned Encampments must be designed to evolve into a more durable/non-temporary shelter model (e.g., tiny house style villages or similar).
- 3. **Continuous-Stay Shelter:** Facility with the primary purpose of providing short-term, temporary overnight Shelter for persons experiencing homelessness that does not require occupants to sign leases or occupancy agreements. Continuous-Stay Shelters are those which are facility-based where households have a room or bed assigned to them for a limited time, typically up to 90 days.

5.1.2 GOALS AND OBJECTIVES

Emergency Shelter programs empower families and individuals experiencing homelessness to regain permanent housing as quickly as possible while providing a safe place to sleep and housing-focused case management services. The objective of the Shelter system is to provide immediate respite for households that are experiencing literal homelessness and/or fleeing violence. While in Shelter, the programs aim to either provide housing-focused case management or to coordinate such services if the person or household is matched to a CE housing resource.

Desired results of Emergency Shelter include:

- Prioritize entry for households that have no other safe alternatives (Day Shelters exempt)
- Offer Diversion Conversations to all households seeking Shelter
- Provide housing-focused case management to support the attainment of permanent housing (Day Shelters exempt)
- Connecting households to mainstream resources and benefits for which they may be eligible

5.1.2.1 EXPECTATIONS FOR EMERGENCY SHELTER

All Emergency Shelter project types should coordinate with and support the Pierce County Dept of Emergency Management to deliver necessary day shelter services during emergencies, including seasonal weather response, as appropriate.

DAY SHELTER

- Day Shelter projects must either provide directly or facilitate access to Coordinated Entry activities on-site, including diversion and prioritization assessment.
- Day Shelter projects must either provide directly or facilitate access to basic needs, medical, and behavioral health services.

SAFE PARKING/SANCTIONED ENCAMPMENTS

- Coordinated with outreach teams for service delivery.
- During inclement weather seasons, connect participants to warming/cooling centers, as appropriate.

OVERNIGHT SHELTER

- Overnight Shelter projects must either provide directly or facilitate access to Coordinated Entry
 activities on-site, including diversion and prioritization assessment. Though Overnight Shelters
 targeting Domestic Violence Survivors are not measured on this outcome, the County expects
 such programs to offer connection to CE to all its shelter participants.
- Overnight Shelter project must work collaboratively with permanent housing and Coordinated Entry providers (as applicable) to help shelter participants move to permanent housing as rapidly as possible. Meaning, it is the County's expectation that all OS households will be offered a diversion conversation with a CE trained staff member.
- Overnight Shelter support services should seek to compliment and supplement supportive services provided by other agencies, focusing primarily on meeting basic needs and services/supports that will help participants exit to permanent housing as smoothly as possible.
- For any participants in Overnight Shelter who are not receiving any other housing focused assistance, the project shall also provide such assistance, including housing locator assistance, which will help the participant develop a housing plan and exit to permanent housing.

5.1.3 PARTICIPATION IN COORDINATED ENTRY

Service providers that receive funding through ESG must partner with Coordinated Entry to ensure that Shelter participants have access to services that can quickly re-stabilize their housing situation (i.e., link with permanent housing).

Shelter Type	CE Referral Policy
Day Shelter	No CE referral required.
Same-Day Shelter	Not required to accept referrals but must coordinate with CE by either becoming a Certified Partner in CE or by coordinating access to CE at their site.
Continuous-Stay Shelter	Must accept referrals from CE and must accept at least 95% of the households referred by CE for admission.

5.1.3.1 EXCEPTIONS TO PARTICIPATION IN CE

Victim service providers may choose to not use CE for referrals.

5.1.4 FUNDING SOURCES REFERENCED IN THIS CHAPTER

Fund sources referenced in this chapter of the Manual include:

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

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

5.2 ELIGIBILITY AND TYPICAL SERVICE FLOW

5.2.1 ELIGIBILITY REQUIREMENTS: FOR PROGRAM ENTRY

5.2.1.1 STANDARD ELIGIBILITY: APPLICABLE TO ALL FUNDING SOURCES

Within Pierce County, coordination among homeless service providers occurs primarily through CE for housing assistance. Households experiencing a housing crisis in Pierce County are directed to use CE. Exceptions are made for households at Emergency Shelters (that offer same-day entry). As noted above, Shelter providers that offer same-day entry may screen and serve households before they have gone through CE. However, Shelter providers must partner with CE to ensure participants have access to services that can quickly re-stabilize their housing situation.

Eligibility for Emergency Shelter may be evaluated by individual providers as long as it is in accordance with ESG guidelines (see 24 CFR 576.401). Households must meet the following conditions:

- Households must be experiencing homelessness, in accordance with Category 1 or Category 4 of the U.S. Department of Housing and Urban Development (HUD)'s Homelessness Definition as defined by HUD under 24 CFR Part 578¹.
- 2. Households must meet an Income Standard. Eligibility varies dependent on fund source. Please see Additional Eligibility Requirements Specific to Funding Source below.

5.2.1.2 ADDITIONAL ELIGIBILITY: REQUIREMENTS SPECIFIC TO FUNDING SOURCE

Funding Source	Eligibility Guidelines
	Income Eligibility Requirement for CHG Standard funding Service providers of CHG funding must apply income eligibility criteria to households. The combined household income must not exceed 50 percent of Area Median Income (AMI) as defined by HUD. CHG Standard Income Eligibility Exemptions
CHG Standard	 Income eligibility requirements are never required for Same-Day Shelter. Continuous-Stay Shelters are exempt from income eligibility requirements for the first 90 days of program participation. Domestic Violence Shelters may waive income eligibility for households after 90 days, on a case-by-case basis, if needed in
	order to ensure safety of the household. Request approval from County in advance.
DRF	In addition to the Standard Eligibility Requirements above, the following requirements apply for DRF-funded ES programs:
DIVI	 Households eligible for DRF-funded resources must meet income requirements of at or below 50% Area Median Income.

¹ See Appendix A-2 for details.

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ESG	No income requirement.
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5.2.2 ELIGIBILITY RE-CERTIFICATION: REQUIREMENTS FOR ENROLLED HOUSEHOLDS

5.2.2.1 ELIGIBILITY RE-CERTIFICATION: OVERVIEW

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

5.2.2.2 ELIGIBILITY RE-CERTIFICATION REQUIREMENTS: SPECIFIC TO FUNDING SOURCE

Funding Source	Eligibility Guidelines
CHG	Following the first 90 days of a household's program participation, CHG Standard-funded Continuous Stay Shelter programs must assess each household for income eligibility at least every three months. Eligibility must be documented using the <i>CHG Verification of Household Eligibility and Income Recertification Form.</i> No income re-certification requirement for Same Day Shelters .
ESG or DRF	No income re-certification requirement.

5.2.2.3 ELIGIBILITY RE-CERTIFICATION: INELIGIBILITY DETERMINATIONS

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

5.2.3 TYPICAL SERVICE FLOW

Emergency Shelters in Pierce County operate autonomously, and while the flow of services may vary, the flow described below identifies the general elements that must be provided by each Shelter type.

Shelter Type	Typical Service Flow
	Data Collection: Day Shelters collect some basic information from individuals or households who utilize their facilities.
Day Shelter	 Daytime Respite: After basic information is collected, Day Shelters provide households with a safe place to be, away from the elements.
	3. Service/Resource Connections : Basic need resources are either available at the Day Shelter, or households can be connected with other resources they may need.

	<u> </u>
	1. Conduct and/or Coordinate Diversion Activity: When a household contacts Emergency Shelter, Shelter staff at Certified Partner agencies will first have a Diversion discussion with the household (in person or over the phone) to explore natural resources available to the household to help them self-resolve their homelessness and offer support in utilizing those natural resources as appropriate, so they do not have to enter Emergency Shelter. Shelter staff at agencies that are not Certified Partners will coordinate with a CE provider to ensure access to a Diversion engagement. Additional information regarding Diversion strategies, housing solutions, and financial assistance may be found in Chapter 3 of this Manual.
	 Data Collection / Shelter Enrollment: Once it is determined the household will enter Emergency Shelter, Shelter staff will enroll the household into the Emergency Shelter program in HMIS.
Compa Day Challery Cafe	Overnight Respite: Shelter staff will provide sleeping arrangements and meals and ensure participant safety.
Same-Day Shelter, Safe Parking or Sanctioned Encampment	4. Housing Stability Plan Development: Shelter staff will meet inperson to assess for needs and develop a Housing Stability Plan with all Shelter participants residing in Shelter longer than 5 days. Shelter staff will upload a copy of these documents into the participant's profile in HMIS. Shelter staff will create a publicly viewable note that contains a summary of the meeting and housing plan. Additional details regarding the Housing Stability Plan may be found in Section 5.3.4.2.
	5. Permanent Housing Connections : Shelter staff apply the practices of progressive engagement with all participants and develop Housing Stability Plans that rely first on the participant's own resources and networks, and then use the least amount of system resources needed to move the participant to permanent housing. Linkages may include Diversion housing solutions, Critical Time Intervention (CTI), Rapid Re-Housing (RRH), or Permanent Supportive Housing (PSH).
	6. Program Exit : Upon exit from Shelter, Shelter staff will close out all agency paperwork according to agency procedures and exit the household from the Emergency Shelter program in HMIS.
Continuous-Stay Shelter	1. Receive Referrals: Continuous stay Shelters must accept referrals from CE. When the Shelter has a vacancy, it must be posted on the Daily Vacancy Tracking Sheet (or similar vacancy tracking mechanism) for CE to fill. CE will acknowledge the program opening and refer the highest qualifying priority household. The Shelter may deny any referrals that they are unable to contact after at least 3 attempts within 72 hours.

- 2. **Data Collection / Shelter Enrollment:** Once it is determined the household will enter Emergency Shelter, Shelter staff will enroll the household into the Emergency Shelter program in HMIS.
- 3. **Overnight Respite:** Shelter staff will provide sleeping arrangements and meals and ensure participant safety.
- 4. Housing Stability Plan Development: Shelter staff will meet inperson to assess for needs and develop a Housing Stability Plan with all Shelter participants residing in Shelter longer than 5 days. Shelter staff will upload a copy of these documents into the participant's profile in HMIS. Shelter staff will create a publicly viewable note that contains a summary of the meeting and housing plan. Additional details regarding the Housing Stability Plan may be found in Section 5.3.4.2.
- 5. **Permanent Housing Connections**: Shelter staff apply the practices of progressive engagement with all participants and develop Housing Stability Plans that rely first on the participant's own resources and networks, and then use the least amount of system resources needed to move the participant to permanent housing. Linkages may include Diversion housing solutions, RRH, or PSH.
- 6. Program Exit: Upon exit from Shelter, Shelter staff will close out all agency paperwork according to agency procedures and exit the household from the Emergency Shelter program in HMIS. The Shelter will then post a new vacancy when the bed space is available.

5.3 POLICIES AND STANDARDS

5.3.1 LOCAL, STATE, AND FEDERAL REGULATIONS

Emergency Shelter programs are governed by an array of state, local, and federal regulations. In addition to the regulations in **Section 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.

5.3.2 HABITABILITY STANDARDS FOR SHELTER FACILITIES

All Emergency Shelters must maintain safe and sanitary facilities. Any Emergency Shelter that receives ESG or DRF for Shelter operations must maintain compliance with <u>24 CFR 576.403</u> Shelter and Housing Standards and comply with the following minimum safety, sanitation, and privacy standards²:

- Structure and Materials. The Shelter building must be structurally sound to protect residents from the elements and not pose any threat to health and safety of the residents. Any renovation (including major rehabilitation and conversion) carried out with ESG assistance must use Energy Star and WaterSense products and appliances.
- Access. The Shelter must be accessible in accordance with Section 504 of the Rehabilitation Act (29 U.S.C. 794) and implementing regulations at <u>24 CFR part 8</u>; the Fair Housing Act (42 U.S.C. 3601 et seq.) and implementing regulations at <u>24 CFR part 100</u>; and Title II of the Americans with Disabilities Act (42 U.S.C. 12131 et seq.) and <u>28 CFR part 35</u>; where applicable.
- Space and Security. Except where the Shelter is intended for day use only, the Shelter must provide each program participant in the Shelter with an acceptable place to sleep and adequate space and security for themselves and their belongings.
- Interior Air Quality. Each room or space within the Shelter must have a natural or mechanical means of ventilation. The interior air must be free of pollutants at a level that might threaten or harm the health of residents.
- Water Supply. The Shelter's water supply must be free of contamination.
- Sanitary Facilities. Each program participant in the Shelter must have access to sanitary facilities
 that are in proper operating condition, are private, and are adequate for personal cleanliness and
 the disposal of human waste.
- **Thermal Environment.** The Shelter must have any necessary heating/cooling facilities in proper operating condition.
- **Illumination and Electricity.** The Shelter must have adequate natural or artificial illumination to permit normal indoor activities and support health and safety. There must be sufficient electrical sources to permit the safe use of electrical appliances in the Shelter.
- **Food Preparation.** Food preparation areas, if any, must contain suitable space and equipment to store, prepare, and serve food in a safe and sanitary manner.

² Additional information may be found at: https://www.hudexchange.info/resource/3766/esg-minimum-habitability-standards-for-emergency-Shelters-and-permanent-housing/.

- Sanitary Conditions. The Shelter must be maintained in a sanitary condition.
- **Fire Safety.** There must be at least one working smoke detector in each occupied unit of the Shelter. Where possible, smoke detectors must be located near sleeping areas. The fire alarm system must be designed for hearing-impaired residents. All public areas of the Shelter must have at least one working smoke detector. There must also be a second means of exiting the building in the event of fire or other emergency.

This policy does not exempt Shelters from having to be compliant with local housing codes. Therefore, if there are requirements that are in both the local housing code and the minimum standards above, the service provider must comply with the more stringent of the two. Additionally, to prevent lead poisoning in young children, Shelter operators must comply with the Lead-Based Paint Poisoning Prevention Act of 1978 and its applicable regulations found at 24 CFR 35, Parts A, B, M, and R. Please see Appendix B-1 for more information on Lead-Based Paint Visual Assessment Requirements.

5.3.2.1 HOTEL & MOTEL SHELTERS

Emergency Shelters programs utilizing a hotel or motel as its facility must request a Housing Quality Standards (HQS) inspection in cases where the room will be utilized for more than 30 days. HQS Inspections can be requested on the County's website:

https://www.piercecountywa.gov/4804/Housing-Quality-Standards-Inspections-HQ

All Emergency Shelters must have an HQS inspections on file no less than annual. This includes hotel/motel if used for 30 days or more.

5.3.3 REQUIRED PROGRAM POLICIES

5.3.3.1 EMERGENCY SHELTER STANDARD OPERATING PROCEDURES

All Emergency Shelters are responsible for developing their own Standard Operating Procedures (SOPs) regarding:

- 1. Admission
- 2. Diversion
- 3. Referral
- 4. Discharge

This includes domestic violence service providers, which adhere to statewide standards for provision of services. At a minimum, these policies must be person-centered, trauma-informed, and based in Housing First approaches. SOPs must be publicly available and must include the Shelter's policies. In addition, service providers are responsible for developing detailed procedures to operate Shelter in accordance with the policies and standards in this Manual.

5.3.4 SERVICE STANDARDS

5.3.4.1 PRIORITIZATION

When there is insufficient Emergency Shelter capacity to meet the need of households experiencing homelessness in Pierce County, Shelter admission should be reserved for unsheltered households who are at greatest risk for severe health and safety consequences.

5.3.4.2 FACILITATION OF CONNECTION TO COORDINATED ENTRY

Emergency Shelters are expected to facilitate a connection to Coordinated Entry for their participants. This may be facilitated by either certifying Emergency Shelter staff in CE to offer CE services on-site, or by coordinating with another certified CE partner organization.

Emergency Shelter programs that are CE Certified and perform CE activities may use funding for Rental Assistance are expected to follow the services standards for Diversion and Assessment (See <u>Chapter 3</u>: <u>Coordinated Entry</u>).

Emergency Shelters that do not have CE Certified staff are encouraged to reference Chapter 3: Coordinated Entry of this Manual for information regarding required policies related to Diversion and Referrals, as well as program standards.

All Emergency Shelter service providers are responsible for developing detailed procedures to facilitate connection to CE in accordance with the policies and standards in this Manual.

Victim service providers of Emergency Shelter must offer the opportunity to connect with Coordinated Entry but will not be measured on the rate of connection to CE.

5.3.4.3 HOUSING STABILITY SERVICES AND PLANS

Diversion Next Steps Plans and Housing Stability Plans outline the household's goals and action steps for obtaining permanent housing as quickly as possible. All Overnight Emergency Shelters are expected to support households in the development and pursuit of a Diversion Next Steps Plan or a Housing Stability Plan. In the case of Certified Partner agencies, the Shelter will initiate the development of the Diversion Next Steps Plan; in the case on non-Certified agencies, the Shelter will support the execution of Diversion Next Steps Plans that are initiated by CE.

Households that do not identify a Diversion Plan are encouraged to develop a Housing Stability Plan that first utilizes the household's own resources and networks to gain permanent housing, but that also identifies a back-up plan for moving to permanent housing. Shelter Case Managers are encouraged to use Motivational Interviewing, Housing-Focused Case Management, and Progressive Engagement strategies to assist households in identifying ways in which they can move out of Shelter and into permanent housing.

Shelter staff will develop Housing Stability Plans that contain the following at a minimum:

- 1. **Housing Goals:** Concrete plan and action steps for moving to housing other than the Shelter, ideally to permanent housing.
- Linkages to Mainstream Resources: Goal and action steps related to obtaining all public/ mainstream benefits to which the participant is entitled. This may include steps towards obtaining or maintaining income through education, employment, job training and/or financial counseling. It may also include linkages to needed physical, mental and/or behavioral health services and supports.

When developing Housing Stability Plans for households, Shelters should help households consider:

- The Household's Own Resources and Networks to Gain Permanent Housing: Some households may have housing options available to them, such as returning to doubled-up housing options. For some households, this may be more appropriate than moving into a unit of their own. This is particularly true of fixed income households or those waiting to receive benefit determinations (such as those waiting on SSI/SSDI applications or appeals). Shelter Case Managers are encouraged to have open conversations with these households about rent costs and their current income, and the time-limited nature of the RRH program. If doubling-up or room sharing is an option for these households, it may be more appropriate to develop a Housing Stability Plan for this option.
- Preparing for RRH Intake and Housing Search: Households eligible for Rapid Re- Housing should begin working with their Shelter Case Manager to prepare for their first intake appointment with the RRH provider. This includes compiling and preparing the needed documents, working through the household's budget, identifying apartment needs/ logistics for the household, and ensuring that all current benefits are being accessed. Shelter Case Managers should share a copy of the Housing Stability Plan and the participants' progress on it with the RRH provider once the household receives a referral. Shelter staff are also encouraged to attend the participant's RRH intake session. This way, participants can transition more easily to the RRH program and both Case Managers are up to date on the participant's case.
- Identifying Potential Barriers to Obtaining Housing: Shelter Case Managers can help participants prepare for RRH by helping to identify elements of a participant's history that may make obtaining housing more difficult, so these can be mitigated if possible and/or discussed with the RRH provider at the first intake appointment. Barriers may include recent criminal history, a history of eviction, outstanding utility debts, very poor or no credit, no income, large family size with no income, or lack of transportation.
- **Preparing Documentation for PSH Eligibility**: Households eligible for Permanent Supportive Housing should begin working with their Shelter Case Manager to prepare the documentation needed for the PSH referral packet and documentation standards.
- The Household's Needed Supports, Such as Mental Health, Physical Health, Public Benefits, Childcare, etc.: While in Shelter, households should be developing plans to connect to all benefits and supportive services necessary to maintain permanent housing.

5.3.4.4 FACILITATION OF CONNECTIONS TO RRH OR PSH

When households are referred to either RRH or PSH, Emergency Shelter staff should:

- Collect the required RRH or PSH documentation.
- Upload all relevant case planning documentation (initial and updated Housing Stability Plans, budgets, etc.) to the participant's profile in HMIS so that these documents are readily accessible for review by the RRH or PSH provider.
- Maintain updated notes in HMIS that provide accurate and complete information regarding the participant's housing situation and status in Shelter.
- Attend the RRH or PSH intake meeting with the participant.
- Provide all documentation and case planning information to the RRH or PSH provider.
- Support carrying out the steps of the participant's Housing Stability Plan.

- Keep the RRH or PSH provider informed of the participant's progress on meeting action steps.
- Keep the RRH or PSH provider informed of the participant's location and eligibility for the program and inform the RRH or PSH provider within one business day if the participant does not sleep in the Shelter for more than two nights in a row.

5.3.4.5 DETERMINING TYPE, AMOUNT, AND DURATION OF ESSENTIAL SERVICES, HOUSING STABILIZATION AND/OR RELOCATION SERVICES

All Emergency Shelters must conduct assessments of their participants' needs for essential services, housing stabilization, and/or relocation services. For most Shelters, this will occur at intake or shortly thereafter, and may be a part of the Housing Stability Plan development process. Reassessment of essential service needs should occur at a frequency determined by each provider. In alignment with The CoC's policies, the standard duration of these services should be decided based on the needs of the participant.

5.3.5 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.

5.3.5.1 TERMINATION OF ASSISTANCE

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

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

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

5.4 PERFORMANCE MEASUREMENT

5.4.1 DATA COLLECTION AND DOCUMENTATION REQUIREMENTS

5.4.1.1 STANDARD HMIS DOCUMENTATION REQUIREMENTS

Shelter Type	HMIS Entry and Exit Data Collection Requirements
Day Shelter	 HMIS Participant Profile / Basic Information HMIS Program Entry (Shelter and, if applicable, Diversion/Diversion Conversation or Priority Pool) HMIS Program Exit (Shelter and, if applicable, Diversion)
Same-Day Shelter	 HMIS Participant Profile / Basic Information HMIS Program Entry (Shelter and, if applicable, Diversion/Diversion Conversation or Priority Pool) Diversion Plan or Housing Stability Plan Household Budget HMIS Program Exit (Shelter and, if applicable, Diversion/Diversion Conversation)
Continuous-Stay Shelter	 HMIS Participant Profile / Basic Information HMIS Program Entry (Shelter and, if applicable, Diversion/Diversion Conversation or Priority Pool) Diversion Plan or Housing Stability Plan Household Budget HMIS Program Exit (Shelter and, if applicable, Diversion/Diversion Conversation) Shelter Bed Vacancy on Daily Vacancy Tracking Form

5.4.1.2 ADDITIONAL DOCUMENTATION REQUIREMENTS

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.

Funding Source	Shelter Type(s) Requirement Applies to	Additional Documentation Requirements
ALL	Applies to All Shelters	 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.
ESG	Applies to all ESG- funded Shelters	All households enrolled in an ESG program must have documentation of the following ³ : 1. Initial Consultation & Eligibility Determination: The household must receive an initial consultation and eligibility assessment to determine housing/homelessness status and the appropriate type of assistance needed to regain stability in permanent housing. a. Housing/homelessness status must be documented in accordance with Documentation Standards for Homeless Definition Categories and HUD's Priority Order for Documenting Homelessness. Additional information may be found in Chapter 1: Universal Requirements. 2. Assistance in obtaining mainstream and other resources: The household must receive appropriate supportive services and referrals essential to achieving independent living through other federal, state, local, and private assistance. 3. Housing stability plan to include: Needs assessment to include specific housing and self-sufficiency goals and action steps to retain permanent housing after ESG assistance ends.
CHG CHG-EHF CHG-Inflation	Applies to Overnight Continuous-Stay Shelters	All households enrolled in a CHG program must have documentation of the following: 1. Income eligibility: The combined household income must not exceed 30 percent of AMI as defined by

³ All of this information must be clearly noted and documented in the participant's case file.					

		HUD. Income eligibility does not have to be verified at project entry but must be documented at least every three months.
	Applies to All Shelters	Households entering Emergency Shelter are exempt from housing/homeless status documentation requirements.
DRF	Applies to All Shelters	In the instance a program is funded by DRF as well as ESG or CHG, the program should utilize the same ESG or CHG documentation requirements for its DRF funding. In the instance a program is funded only by DRF and neither ESG or CHG, service providers should utilize the CHG documentation requirements.

5.4.1.3 DOCUMENTATION COLLECTION

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

5.4.2 METRICS

The following measures are typically used to evaluate the performance of the Homeless Crisis Response System (HCRS) Emergency Shelter programs. Measures may be added or amended based on specific funding source requirements, CoC priorities, or evaluation strategies.

	Metric				
Category	All Funding Sources	Overnight Continuous Stay Shelters	Day Shelter and Overnight Same Day/Drop-In Shelter		
	Percent of beds occupied	Median length of stay from program entry to exit*	Exits to positive outcomes		
Emergency Shelter	Percent of households exiting to permanent housing	Percentage of households successfully diverted from homelessness			
Program Outcomes	Returns to homelessness within 2 years after Emergency Shelter exit** Percent of households				
	with a CE enrollment**				

^{*} Victim Service Providers operating Emergency Shelter may have a longer median length of stay target.

^{**} Victim Service Providers operating Emergency Shelter will not be held to these targets.

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

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

5.5 ELIGIBLE ACTIVITIES

5.5.1 ELIGIBLE ACTIVITIES OVERVIEW

Funds may be used to provide engagement, case management, and immediate needs as necessary to help participants connect with Emergency Shelter, housing, and other critical health services. Eligible cost categories are included in the table below.

	ESG	СНС	ORF
Emergency Shelter	ш	Ö	D
ELIGIBLE ACTIVITIES			
Rental Assistance – for CE Certified programs			
Rent Payments			
Rental Assistance – for profit, non-profit, gov't. Cannot exceed 24 mo. Including:		Х	х
Rental Arrears, including associated late fees		Х	Х
Lot rent for RV or manufactured home		Х	Х
Utilities, when included in rent		Х	Х
Other fees, when included in rent		Х	Х
Reimbursement for damages paid to a landlord		Х	х
Hotel/Motel		Х	Х
Parking Space Connected to Unit		Х	Х
Security Deposits		Х	Х
Last Month's Rent		Х	Х
Other Costs Associated with Rent			
Credit Checks		Х	Х
Housing Application Fees		Х	Х
Legal fees and fines			Х
Moving Costs			Х
Storage Costs			Х
Utility Assistance/Deposits		Х	Х
Utility Arrears		Х	Х
Costs Associated with Emergency Transfer Plans			
Project Operations			
Costs Associated with Payroll			
Housing Search and Placement		Х	Х
Housing Stability Case Management		Х	Χ
HMIS Data Collection and Entry X		Х	Х
Sub-Contracted Services		Х	Χ
Supportive Service Costs			
Child Care X			Х
Credit Repair - budgeting/money management			Х

Emergency Shelter	ESG	СНС	DRF
Education Services	Х		Х
Employment Assistance	Х		Х
Legal Services	Х		Х
Life Skills	Х		Х
Mediation			Х
Mental Health Services	Х		Х
Outpatient Health Services	Х		Х
Substance Abuse Treatment Services	Х		Х
Transportation	Х	Х	Х
Other Program Costs			
General Liability Insurance		Х	Х
Office Internet		Х	Х
Office Space		Х	Х
Office Supplies		Х	Х
Office Utilities		Х	Х
Staff Training/Conference/Per Diem		Х	Х
Telephone		Х	Х
Uniform Relocation Assistance	Х		
Facility Support			
Lease Payments			
Lease/Rent on Facility	Х	Х	Х
Hotel/Motel	Х	Х	Х
Move-in Costs to Permanent Housing		Х	Х
Other Facility Costs			
Facility Equipment and Supplies	Х	Х	Х
Facility Janitorial		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	
Other Costs to Secure Permanent Housing		Х	Х
Property Insurance	Х	Х	Х
Transportation to the Facility	Х	Х	Х
Utilities	Х	Х	Х
Administrative Expenses			
Advertising			Х
Communications			Х
Facilities Maintenance & Repairs			Х

Emergency Shelter	ESG	CHG	DRF
Insurance			Х
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

5.5.2 DETAILED ELIGIBLE ACTIVITIES: SPECIFIC TO FUNDING SOURCE

5.5.2.1 ESG-FUNDED EMERGENCY SHELTER ELIGIBLE EXPENSES

ESG-eligible Emergency Shelter costs are those which provide essential services to families and individuals experiencing homelessness in Emergency Shelters, the renovation of buildings to be used for Emergency Shelter, and the operating of Emergency Shelters. Detailed information on eligible activities and allowable costs can be found at 24 CFR 576.102, 2 CFR 200, AND WAC 388-400-065. Eligible ESG-funded Emergency Shelter activities are summarized in the table below.

ESG Eligible Activity and Cost Details

Project Operations

Costs Associated with Payroll

- Housing Stability Case Management: Assessing housing and service needs and arranging, coordinating, or monitoring the delivery of individualized services, including:
 - Using the Coordinated Entry system
 - Conducting the initial evaluation required, including verifying and documenting eligibility
 - Counseling
 - o Developing, securing, coordinating services and obtaining Federal, State, and local benefits
 - Monitoring and evaluating participant progress
 - o Providing information and referrals to other providers
 - Providing ongoing risk assessment and safety planning with victims of domestic violence, dating violence, sexual assault or stalking
 - Developing an individualized housing and service plan, including planning a path to permanent housing stability
- HMIS Data Collection and Entry: Paying salaries for operating HMIS, including:
 - Completing data entry
 - Monitoring and reviewing data quality
 - Completing data analysis
 - o Reporting to the HMIS Lead
 - Training staff on using the HMIS or comparable database
 - o Implementing and complying with HMIS requirements

Supportive Services Costs

- Child Care: Licensed childcare, including providing meals and snacks, and comprehensive and coordinated sets of appropriate developmental activities, for participants with children under the age of 13, or disabled children under the age of 18. The childcare center must be licensed by the jurisdiction in which it operates in order for its costs to be eligible.
- Education Services: Instruction or training to enhance participants' ability to obtain and maintain housing, including literacy, English as a second language, GED, consumer education, health education, and substance abuse prevention. Eligible 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 and Job Training: The costs of employment assistance and job training programs are eligible, including classroom, online, and/or computer instruction; on-the-job instruction; and 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 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
 prevocational training; books and instructional material; counseling or job coaching; and
 referral to community resources.
- Legal Services: Necessary legal services regarding matters that interfere with the program participant's ability to obtain and retain housing. ESG-funds may be used only for these services to the extent that other appropriate legal services are unavailable or inaccessible within the community.
 - Eligible subject matters are child support, guardianship, paternity, emancipation, and legal separation, orders of protection and other civil remedies for victims of domestic violence, dating violence, sexual assault and stalking, appeal of veterans and public benefit claim denials and the resolution of outstanding criminal warrants.
 - Eligible services or activities may include client intake, preparation of cases for trial, provision of legal advice, representation at hearings and counseling.
 - Fees based on actual service performed (i.e. fee for service) are also eligible, but only if the
 cost would be less than the cost of hourly fees. Filing fees and other necessary court costs
 are also eligible.
 - Legal immigration and citizenship matters and issues relating to mortgages are ineligible costs. Retainer fee arrangements and contingency fee arrangements are also ineligible costs.
- Life Skills Training: Critical life skills necessary to assist the participant to function independently in the community. Life skills training includes budgeting resources, managing money, managing a household, resolving conflict, shopping for food and needed items, improving nutrition, using public transportation, and parenting.
- Mental Health Services: Direct outpatient treatment of mental health conditions by licensed
 professionals, provided that other appropriate mental health services are unavailable or
 inaccessible within the community. ESG funds may only be used for these services to the extent
 that other appropriate mental health services are unavailable or inaccessible within the
 community.
 - Mental health services are the application of therapeutic processes to personal, family, situational, or occupational problems in order to bring about positive resolution of the

- problem or improved individual or family functioning or circumstances. Problem areas my include family and marital relationships, parent-child problems, or symptom management.
- Eligible treatment consists of crisis interventions, 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: Direct outpatient treatment of medical conditions provided by licensed medical professionals, provided that other appropriate health services are unavailable or inaccessible within the community.
 - Eligible costs are for the direct outpatient treatment of medical conditions and are provided by licensed medical professionals. ESG funds may be used only for these services to the extent that other appropriate health services are unavailable within the community.
 - Eligible treatment consists of assessing a participant's health problems and developing a
 treatment plan, assisting participants to understand their health needs, providing directly or
 assisting participants to obtain appropriate medical treatment, preventive medical care, and
 health maintenance services, including emergency medical services, providing medication
 and follow-up services, and providing preventive and non-cosmetic dental care.
- Substance Abuse Treatment Services: Treatment services provided by licensed or certified
 professionals that are designed to prevent, reduce, eliminate, or deter relapse of substance abuse
 or addictive behaviors. Services are eligible only if other appropriate substance abuse treatment is
 unavailable or inaccessible within the community.
 - Eligible treatment consists of client intake and assessment, and outpatient treatment for up to 30 days. Group and individual counseling and drug testing are eligible costs. Inpatient detoxification and other inpatient drug or alcohol treatment are not eligible costs.
- Transportation: Costs of travel by participants to and from medical care, employment, childcare, or other facilities that provide eligible essential services, and the cost of staff travel to support provision of essential services, including:
 - Cost of participants travel on public transportation
 - o If staff use their own vehicles, mileage allowance for staff visits to participants
 - Cost of purchasing or leasing a vehicle in which staff transports participants and/or staff serving participants, the cost of gas, insurance, taxes and maintenance of the vehicle
 - Travel costs of staff to accompany or assist participant to use public transportation
- Services for Special Populations: Otherwise eligible essential services that have been tailored to
 address the special needs of homeless youth, victims of domestic violence and related
 crimes/threats, and/or people living with HIV/AIDS who are in Emergency Shelters. Eligible costs
 include all supportive services and case management as described above.

Other Program Costs

• Uniform Relocation Assistance: Costs of providing assistance under the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (URA), including relocation payments and other assistance to persons displaced by a project assisted with ESG funds.

Facility Support

Lease Payments

- **Rent on Facility:** Cost of rent for a facility used as emergency shelter.
- **Hotel/Motel:** Where no appropriate emergency shelter is available for a homeless household, ESG-funds may be used for a hotel/motel voucher for the household.

Other Facility Costs

- Facility Equipment and Supplies: As needed for the operation of the emergency shelter
- Facility Maintenance and Repairs: Includes minor or routine repairs for the emergency shelter
- Facility Security: As needed for the operation of the emergency shelter
- Food Served in Facility
- Property Insurance: For the emergency shelter building
- Transportation to the Facility: Fuel only
- **Utilities:** For the emergency shelter building

5.5.2.2 CHG-FUNDED EMERGENCY SHELTER ELIGIBLE EXPENSES

Eligible CHG-funded Emergency Shelter activities are summarized in the table below.

CHG-Funded Program Eligible Costs

Rental Assistance – for CE Certified Programs offering CE Activities ONLY

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. Must align with policy in 3.3.13.2.
 - 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.
 - o *HEN rent subsidy*: HEN households cannot be required to pay any of their Aging, Blind Disabled (ABD) cash benefit or other earned income reported to DSHS towards their rent.
- **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. Must align with policy in 3.3.13.2.
 - 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. Must align with policy in 3.3.13.2.
 - 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 (See 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.
 - o Includes intake and assessment (time spent assessing a household), whether or not the household is determined eligible
 - Includes mediation and outreach to property owners/landlords related to locating or retaining housing
- Housing Stability Services: This includes developing an individualized housing and service plan, monitoring and evaluating household progress, identifying creative and immediate housing solutions outside of the traditional homeless service system (Diversion), SSI/SSDI Outreach, Access, and Recovery (SOAR), and assuring that households' rights are protected.
- HMIS Data Collection and Entry: staff and benefits for activity; must be directly attributable to project
- **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

• **Equipment:** up to \$5,000 per grant period unless approved in advance by the County and Commerce.

Facility Support

Lease Payments

- Lease/Rent on Facility: Cost of lease/rent for a facility used as emergency shelter.
- 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 shelter 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 the emergency shelter
- 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 emergency shelter 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

5.5.2.3 DRF-FUNDED EMERGENCY SHELTER ELIGIBLE EXPENSES

Eligible DRF-funded Emergency Shelter 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 – for CE Certified Programs offering CE Activities ONLY

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. Must align with policy in 3.3.13.2.
 - 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.
 - HEN rent subsidy: HEN households cannot be required to pay any of their Aging, Blind
 Disabled (ABD) cash benefit or other earned income reported to DSHS towards their rent.
- **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. Must align with policy in 3.3.13.2.
 - 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
- 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. Must align with policy in 3.3.13.2.
 - 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 (See Appendix C-14).
- Other costs: as approved by the County and Commerce

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
 - Provision of appropriate medication
 - Providing follow-up services
 - o 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
 - 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,
- **Training or Conferences**: related to service delivery, including travel and per diem
- **Other costs** as approved by the County.

Facility Support

Lease Payments

- **Lease/Rent on Facility:** Cost of lease/rent for a facility used as emergency shelter.
- 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 shelter 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 the emergency shelter
- 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 emergency shelter 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
 - o Office supplies are items that aid in the short-term operation of your organization. These items usually need to be refilled or replaced. These include items such as printer ink, paper

clips, paper, pens, staples, record keeping supplies, janitorial supplies, break room supplies, etc.

- Personnel Salaries & Benefits, including:
 - Executive Staff
 - Human Resources
 - Accounting
 - Legal
- Professional Services
- Public Utilities
- Small Tools & Minor Equipment
- Other costs: as approved in advance by the County

5.5.3 INDIRECT COSTS

Indirect costs eligibility varies by funding source. Indirect costs are eligible within ESG and 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.

5.5.4 SUBMITTING FOR COST REIMBURSEMENT

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

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

- For service providers that have an accounting system or software that produces expense reports, the expectation would be an expense report with all costs easily identified, where costs requested for reimbursement are clearly classified from other agency costs, is required. Attach this report to the reimbursement request. The Provider will retain documents and actual receipts reflected in the expense report and be available for monitoring from Pierce County Human Services Contract Monitors, State Auditors and Federal Reviews as applicable.
- For Providers that do not have an accounting system or software that produces expense reports, the expectation is copies of receipts, and paid invoices will be provided with each payment request. The Provider will retain the original documents and actual receipts to be available for monitoring from Pierce County Human Services Contract Monitors, State Auditors and Federal Reviews as applicable.

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

5.6 ADDITIONAL RESOURCES

5.6.1 RELATED MANUALS AND RESOURCES

Resource	Link
Washington State Department of	https://www.commerce.wa.gov/serving-
Commerce 2019 Consolidated Homeless	communities/homelessness/consolidated-homeless-
Grant Guidelines	grant/
Emergency Solutions Grant (ESG)	https://www.hudexchange.info/resource/1927/hearth-
Regulations	esg-program-and-consolidated-plan-conforming-
	amendments/

5.6.2 REQUIRED FORMS

Form	Appendix Item
Daily Vacancy Tracking Sheet (Required for Overnight Continuous	Contact CE Referral
Stay Shelters only)	provider for access

5.6.3 REFERENCED APPENDICES

Item	Appendix Item
HUD Homeless Definition & Documentation Resource	A-2
Lead-Based Paint Visual Assessment Requirements	B-1
Diversion Next Steps Plan	C-16