

King County
Department of Community and Human Services
Housing, Homelessness and Community Development Division

# King County

## Subgrantee Guidelines

FOR THE

## Consolidated Homeless Grant

### Effective July 1, 2025

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# 1 Grant Basics

## 1.1 Purpose Statement

The Homelessness Assistance Unit at the Department of Commerce administers state and federal funds to support homeless crisis response systems in WA State, following the strategies outlined in Washington's Homeless Housing Strategic Plan.

The Consolidated Homeless Grant (CHG) is a critical resource in the crisis response system.

People living unhoused become stably housed when the system is low barrier, trauma informed, culturally responsive, and Housing First oriented. A Housing First philosophy guides the crisis response system to connect people to stable housing as quickly as possible, without preconditions, because meeting the basic human need of a safe and decent place to live sets people up for greater wellness in all areas of life.

People living unstably housed become stably housed when the system is oriented toward person-centered services, which promote personal autonomy, choice, and build on the strengths and resources of those served through the crisis response system.

Subgrantees must respond to the disproportionality in access to services, service provision and outcomes and cannot simply rely on standard business practices to address inequity. Subgrantees have the responsibility to ensure all people eligible for services receive support and are served with dignity, respect and compassion regardless of circumstance, ability or identity.

This includes marginalized populations, Black, Native and Indigenous, People of Color, immigrants, people with criminal records, people with disabilities, people with mental health and substance use vulnerabilities, people with limited English proficiency, people who identify as transgender, people who identify as LGBTQ+, and other individuals that may not access mainstream support.

## 1.2 Overview

The Consolidated Homeless Grant (CHG) combines state homelessness assistance resources into a single grant opportunity to county governments and nonprofits under the administration of the Washington State Department of Commerce (Commerce). CHG is designed to support an integrated system of housing assistance to quickly re-house households who are experiencing homelessness and prevent homelessness. This grant provides resources to address the needs of people who are experiencing homelessness or at-risk of homelessness, as described in Local Homeless Housing Plans.

These funds are authorized under Washington State law, Chapter 43.185C RCW Homeless Housing and Assistance. Commerce is responsible for distributing the state's share of document recording fee revenue to counties, referred to as lead grantees. These funds support implementation of programs and projects that align with county Local Homeless Housing Plans. The goal is to help individuals who are experiencing or at risk of homelessness achieve housing stability, to address systemic causes of homelessness and support data collection and reporting on the crisis response system. Commerce also provides technical assistance to lead grantees for all aspects of grant administration.

The CHG is funded through two sources: the state general fund and document recording fee revenue. In these guidelines, the associated grant budget categories are referred to as Standard, Permanent Supportive Housing for Chronically Homeless Families (PSH CHF), Homelessness Prevention (HP), Emergency Housing, Housing and Essential Needs (HEN), Document Recording Fee (DRF) Backfill, and Inflationary Increase. Each budget category supports specific housing interventions and has distinct client eligibility requirements. These guidelines outline how to comply with the applicable requirements, and Commerce encourages grantees to reach out for clarification, as needed.

Consolidated Homeless Grant Funds are awarded to King County by the State of Washington Department of Commerce. King County and the King County Regional Homelessness Authority (KCRHA) each have contracts with subgrantee agencies that reference the King County CHG Guidelines.

**Budget Category, Interventions and Eligibility:**

| Budget Category* | Allowable Housing Interventions | Housing Status Eligibility | Income Eligibility | Where to Find Eligibility Requirements in Guidelines |
|---|---|---|---|---|
| Standard, Inflationary Increase, Document Recording Fee (DRF) Backfill | ✓ Emergency Shelter<br>• Drop-In<br>• Continuous Stay<br>✓ Transitional Housing<br>✓ Rapid Re-Housing<br>✓ Street Outreach | ✓ Homeless | At or Below 50% AMI at entry (see Section 3.5.1 for income exemptions for homeless households) | Homelessness Assistance |
| | ✓ Homelessness Prevention | ✓ At Risk of Homelessness | | Homelessness Prevention |
| | ✓ Permanent Supportive Housing | ✓ Homeless and a household member with a permanent disability | | Homelessness Assistance |
| Permanent Supportive Housing for Chronically Homeless Families (PSH CHF) | ✓ Permanent Supportive Housing<br>✓ Street Outreach | ✓ A chronically homeless head of household with a permanent disability | At or Below 50% AMI at entry | Homelessness Assistance |
| Homelessness Prevention (previously known as Eviction Prevention) | ✓ Homelessness Prevention | ✓ At Risk of Homelessness | At or Below 50% AMI at entry | Homelessness Prevention |
| Emergency Housing | ✓ Emergency Shelter<br>• Drop-In<br>• Continuous Stay<br>✓ Transitional Housing<br>✓ Rapid Re-Housing<br>✓ Street Outreach | ✓ Homeless | At or Below 50% AMI at entry | Homelessness Assistance |

| | | | | |
|---|---|---|---|---|
| Housing and Essential Needs (HEN) | ✓ Transitional Housing (TH)**<br>✓ Rapid Re-Housing (RRH)<br>✓ Permanent Supportive Housing (PSH)**<br>✓ Street Outreach | ✓ Homeless | HEN Referral<br><br>OR<br><br>Lost HEN Referral due to receiving federal supplemental security income, social security disability income, or social security retirement income and still has an immediate housing need | Housing and Essential Needs |
| | ✓ Homelessness Prevention (HP) | ✓ At Risk of Homelessness | | Housing and Essential Needs |

*Allowable expenses are detailed in Section 6 Allowable Expenses and are for all budget categories; note DRF backfill can also fund local plan activities not identified as CHG allowable expenses. The following guidelines sections are required for all budget categories: Section 7 Requirements for all Housing Interventions, Section 8 Additional Requirements for Rent Assistance, and Section 9 Habitability Requirements for all Rent Assistance and Facility-Based Projects.

**See Section 6.2.3 HEN Facility Support.

## 1.3 How to Navigate the CHG Guidelines

The CHG guidelines outline the allowable grant activities and requirements, including system-level, administrative, and direct service requirements. They also define allowable housing interventions and provide basic elements of service delivery expectations and recommendations.

Because the guidelines address both high-level grant administration and direct service delivery, it is essential to be familiar with their full scope in order to apply them effectively.

The guidelines are not intended to serve as program-level policies and procedures. Instead, they should be used to guide the development of local policies and procedures.

**Navigation Tip:** For easier reading, we recommend viewing the guidelines in Microsoft Word. Once open, go to the "View" tab in the top toolbar. Under the "Show" section, check the box for "Navigation Pane". When the Navigation Pane appears on the left, click the "Headings" tab. This will create a clickable table of contents to help you quickly navigate to each section.

Subgrantees providing direct service may find the following sections of the guidelines most relevant: Grant Basics (Section 1), population eligibility for programs (Sections 3-5, Appendix E), allowable expenses (Section 6), required program requirements (Sections 7-9), required client file forms and documentation (Appendix A and C), required policies and procedures (Appendix B), and homeless system performance requirements (Appendix D).

Fiscal staff should bookmark Grant Basics (Section 1), Administrative Requirements (Section 2), Grant Management (Section 2.2), Fiscal Administration (Section 2.3), and allowable expenses (Section 6).

The guidelines are organized as follows:

**Section 1: Grant Basics**
Provides a grant overview and purpose statement including allowable housing interventions. Section 1.1 includes a summary chart by budget category outlining allowable interventions, housing status eligibility, income eligibility, and where to find the eligibility requirements in the guidelines.

**Section 2: Administrative Requirements of Lead Grantees**
Outlines lead grantee responsibilities related to the homeless system, grant management, and fiscal oversight. Some of these requirements are operationalized and implemented by subgrantees, but lead grantees are responsible for ensuring compliance.

**Section 3: Homelessness Assistance, Section 4: Homelessness Prevention, and Section 5: Housing and Essential Needs**
These sections define household eligibility: households experiencing homelessness, households at risk of homelessness, and households with a Housing and Essential Needs (HEN) Referral.

They also detail the allowable housing intervention types and documentation requirements for each population served. Refer back to the chart in Section 1.1 to review which budget categories can serve each population.

**Section 6: Allowable Expenses for all Budget Categories**
Covers allowable expenses across all CHG budget categories, including rent, facility support, operations, and administration.

**Section 7: Requirements for all Housing Interventions**
This section outlines the requirements for all housing interventions and services funded through CHG. It includes, but is not limited to, guidelines on voluntary services, housing choice, progressive engagement, assessment and housing stability planning, complaint procedure, and HMIS participation.

**Section 8: Additional Requirements for Rent Assistance**
This section outlines all requirements for interventions providing rent assistance payments.

**Section 9: Habitability Requirements for all Rent Assistance and Facility-Based Projects**
Specifies habitability standards and documentation requirements for all projects providing rent assistance or operating facility-based housing.

**Section 10: Appendices**
A: Lists all required forms
B: Lists all required policies and procedures
C: Details all required client file documentation by housing intervention
D: Includes performance requirements
E: Summarizes household eligibility requirements
F: Provides examples of facility maintenance activities
G: Provides detailed Lead-Based Paint Visual Assessment Requirements
H: Details data security requirements for accessing the Benefits Verification System (BVS)
I: Details data security requirements for accessing the DSHS HEN Referral List

J: Landlord Verification

## 1.4 Allowable Housing Interventions

All allowable housing interventions are defined below. Allowable interventions are dependent on the budget category; refer to the chart in Section 1.1 Overview.

### 1.4.1 Temporary Housing Interventions

Temporary housing interventions are those in which the household must leave the shelter or unit at the end of their program participation. Households are considered homeless while enrolled in temporary housing interventions.

#### 1.4.1.1 Emergency Shelter

Emergency Shelter (ES) provides short-term[1] temporary shelter (lodging) for those experiencing homelessness. Emergency Shelters can be facility-based or hotel/motel voucher.

Emergency shelters typically address the basic health, food, clothing and personal hygiene needs of the households that they serve and provide information and referrals about supportive services and housing. Some shelters are overnight only, while others operate 24/7. Where shelters are 24/7 and have navigation and/or case management services (often called "enhanced shelter"), services emphasize housing attainment through housing-focused assessment and housing stability planning, which includes working with households to identify and refer to other resources in the community to support on-going household and housing stability.

##### 1.4.1.1.1 Drop-in Shelter

Drop-in Shelters (also known as Overnight Only Shelters) are facility-based and offer night-by-night living arrangements that allow households to enter and exit on an irregular or daily basis. This does not include day-only shelters.

##### 1.4.1.1.2 Continuous-stay Shelter

Continuous-stay Shelters offer living arrangements where households have a room or bed assigned to them throughout the duration of their stay.

#### 1.4.1.2 Transitional Housing

Transitional Housing (TH) is subsidized, facility-based housing, including global leases (also known as master or supportive leases) at scattered sites, that is designed to provide long-term[2] temporary housing and to move households experiencing homelessness into permanent housing. Lease or rental agreements are required between the transitional housing project and the household.

Transitional Housing is intended to provide assistance to households who need more intensive or deeper levels of support services to attain permanent housing. Emphasis is still placed on rapid exit to permanent housing, but lengths of stay are flexible and tailored to the unique needs of each household. Services continue to emphasize housing attainment through a housing-focused assessment and housing stability planning, which includes working with each household to identify and refer households to other resources in the community to support on-going household and housing stability. All services are person-centered and tailored to the individual needs of each

[1] Emergency Shelter programs are typically designed and intended to provide temporary shelter for short- term stays: up to three months. Clients are not required to exit after 90 days.

[2] Transitional Housing programs are typically designed and intended to provide temporary housing for long-term stays: up to two years.

household. Transitional housing comes in a variety of facility-types, from congregate-style living to scattered site apartments.

### 1.4.2 Permanent Housing Interventions

Permanent housing is housing in which the household may stay as long as they meet the basic obligations of tenancy.

#### 1.4.2.1 Rapid Re-Housing

Rapid Re-Housing (RRH) quickly moves households from homelessness into permanent housing by providing:

- ✓ Housing Identification Services: Recruit landlords to provide housing for RRH participants and assist households with securing housing.
- ✓ Financial Assistance: Provide assistance to cover move-in costs and deposits as well as ongoing rent and/or utility payments.
- ✓ Case Management and Services: Provide services and connections to community resources that help households maintain housing stability.

See *Seattle and King County Rapid Re-Housing Program Standards* for additional requirements and information.

#### 1.4.2.2 Homelessness Prevention

Homelessness Prevention (HP) helps households who are at risk of homelessness to maintain or obtain stable housing and avoid homelessness. Services include housing-focused case management and temporary rent subsidies. Homelessness prevention services are the same as the RRH services described above.

#### 1.4.2.3 Permanent Supportive Housing

Permanent Supportive Housing (PSH) is subsidized, non-time-limited housing with support services for homeless households that include a household member with a permanent disability. Support services must be made available, but participation is voluntary (see Section 7.2). PSH may be provided as rent assistance (scattered site) or facility-based model. For facility-based models, a lease or rental agreement is required between the PSH project and the household. The services and the housing are available permanently.

Households funded with CHG PSH CHF must include a Head of Household who is chronically homeless and permanently disabled.

### 1.4.3 Services Only Interventions

#### 1.4.3.1 Street Outreach

Street outreach is a strategy for engaging people experiencing homelessness who are otherwise not accessing services for the purpose of connecting them with emergency shelter, housing, or other critical services.

# 2 Administrative Requirements of Lead Grantees

Only sections applicable to CHG subgrantees are included herein.

## 2.1 Homeless System Responsibilities

### 2.1.1 Homeless System Performance Requirements

Subgrantees must improve housing outcomes by making progress towards the statewide performance targets. For each housing intervention type funded by CHG, grantees must adopt the required housing outcome performance measure outlined in Table A, in Appendix D: Homeless System Performance Requirements. See Appendix D for more information.

### 2.1.2 Low Barrier Housing Requirement

All homeless housing projects must adhere to state and federal anti-discrimination laws:

- ✓ All projects ensure equal access for people experiencing homelessness regardless of race, national origin, gender identity, sexual orientation, marital status, age, veteran or military status, disability, or the use of an assistance animal.
- ✓ Projects designed to serve families with children experiencing homelessness ensure equal access regardless of family composition and regardless of the age of a minor child.
- ✓ Projects that operate gender segregated facilities allow the use of facilities consistent with the person's gender expression or identity.

#### 2.1.2.1 Intake & Project Eligibility

Low barrier projects have flexible intake schedules and require minimal documentation. At the minimum, homeless households are not screened out based on the following criteria:

- ✓ Having too little or no income
- ✓ Having poor credit or financial history
- ✓ Having poor or lack of rental history
- ✓ Having involvement with the criminal justice system
- ✓ Having active or a history of alcohol and/or substance use
- ✓ Having been impacted or affected by a crime
- ✓ The type or extent of disability-related services or supports that are needed
- ✓ Lacking ID or proof of U.S. Residency Status
- ✓ Other behaviors that are perceived as indicating a lack of "housing readiness," including resistance to receiving services

#### 2.1.2.2 Project Participation

Low barrier projects have realistic and clear expectations. Rules and policies are narrowly focused on maintaining a safe environment and avoiding exits to homelessness. Low barrier projects do not have work or volunteer requirements.

Projects that require households to pay a share of rent allow reasonable flexibility in payment. Emergency shelters cannot require households to pay a share of rent or program fees.

Households are not terminated from the project for the following reasons:

- ✓ Failure to participate in supportive services or treatment programs

- ✓ Failure to make progress on a housing stability plan
- ✓ Alcohol and/or substance use in and of itself is not considered a reason for termination
- ✓ Households residing in emergency shelter must not be exited to homelessness due to reaching a maximum stay limit.

If a household is terminated from a low barrier project due to violating rules focused on maintaining a safe environment, there must be a process in place for the household to be considered for re-enrollment if the household demonstrates unsafe behavior is unlikely to re-occur (i.e. engaged in new treatment plan, mental health services, medical care, etc.).

### 2.1.3 Coordinated Entry System

**All CoCs:**

Transitional Housing, Homelessness Prevention, Rapid Re-Housing, and Permanent Supportive Housing projects funded by CHG[3] must participate in the county or regional CE by accepting referrals and must fill openings exclusively through the CE process.

If the county or regional CE requires Emergency Shelters and Drop-in Shelters to participate in the county or regional CE process, Emergency Shelters and Drop-in Shelters funded by CHG must participate in the county or regional CE process by accepting referrals and must fill openings exclusively through the CE process.

Street Outreach projects funded by CHG must be linked to the county or regional CE by either performing mobile CE process services (e.g. assessment) or by providing referrals to CE.

### 2.1.4 Reporting Requirements

This section applies to the CHG contracting entities.

### 2.1.5 Training

Subgrantees must identify staff to attend and complete trainings. These staff should include staff that provide direct services, supervisors of direct service staff, and staff that manage homeless grants.

The following trainings are required at least every three years and attendance must be documented:

- ✓ Trauma Informed Services
- ✓ Supporting survivors of domestic violence
- ✓ Local coordinated entry policies and procedures as required by lead CE entity
- ✓ Fair Housing
- ✓ Housing First
- ✓ Racial Equity
- ✓ LGBTQ+ competency
- ✓ Rapid Re-Housing
- ✓ Progressive Engagement and Problem-Solving (Diversion)
- ✓ Low Barrier Services & Harm Reduction

Other recommended trainings include mental health first aid, motivational interviewing, crisis

[3] Excludes HEN for Independent CoCs. For Balance of State CoCs, HEN must participate in CE but may be a subpopulation access point.

intervention, professional boundaries, Residential Landlord-Tenant Act (RLTA), and case management.

Costs to attend trainings are an allowable program expense under Operations, see Section 6.3.

Visit the Commerce Homeless Services Grantee Trainings webpage for available online trainings. Additional CHG trainings can be found at the CHG Technical Assistance and Training webpage.

### 2.1.6 Benefit Verification System Requirements

Commerce maintains a data share agreement with the Department of Social and Health Services (DSHS) so homeless housing grantees can access the Benefits Verification System (BVS) to confirm HEN program eligibility.

Subgrantees are strongly encouraged to access BVS directly through DSHS when possible. Requests for BVS through DSHS access can be made by contacting the DSHS Data Sharing Coordinator at ESADSA@DSHS.WA.GOV.

Lead grantees manage BVS User access for their staff and subgrantees. Upon approval by Commerce, lead grantees may also appoint another agency as the BVS lead for their county.

BVS leads are responsible for the following:

- ✓ Review User requests to confirm requesting agency is a subgrantee and staff have a business need to access the BVS system.
- ✓ Confirm that each User request includes a signed DSHS Non-Disclosure form.
- ✓ Retain all signed DSHS Non-Disclosure forms.
- ✓ Maintain an Excel spreadsheet identifying current and past BVS Users. Spreadsheet must be in format designated by Commerce.
- ✓ Report to Commerce within one business day when User no longer require access to BVS.
- ✓ Provide access to DSHS Non-Disclosure forms and User spreadsheet for inspection within one business day of request by Commerce or DSHS.

BVS leads are also responsible for the following, annually:

- ✓ Require Users to re-sign DSHS Non-Disclosure form.
- ✓ Review BVS User spreadsheet for accuracy and notify Commerce of any changes.
- ✓ Notify Commerce via email upon completion of annual requirements.

See Appendix H: Access to the DSHS Benefits Verification System Data Security Requirements for additional details.

## 2.2 Grant Management

### 2.2.1 Changes to Guidelines

King County may revise the Guidelines at any time. All subgrantees will be sent notice of changes to the guidelines by their CHG contracting entity. Subgrantees are responsible for implementing revisions in the timeline provided.

These guidelines and forms referenced herein are posted on your CHG contracting entity's website.

### 2.2.2 Commerce Monitoring

This section applies to the CHG contracting entities.

### 2.2.3 Subgrantee Requirements

The Grant General Terms & Conditions identify subgrantee requirements. In addition, all subgrantee agreements must be time-limited and have defined roles and responsibilities for each party, detailed budgets and performance terms. Commerce reserves the right to directly contact subgrantees at any time for data quality, monitoring, fiscal and other issues.

Lead grantees may enter into an agreement with any other local government, Council of Governments, Housing Authority, Community Action Agency, nonprofit community or neighborhood-based organization, federally recognized Indian tribe in the state of Washington, or regional or statewide nonprofit housing assistance organizations who operate programs to end homelessness within a defined service area per RCW 43.185C.080. For profit organizations are not eligible to receive CHG funds.

Lead grantees must provide Commerce with copies of subgrant agreements (upon request) and notify Commerce if subgrants are terminated during the grant period.

Lead grantees must notify Commerce within 30 days of any changes in the selection of subgrantees funded with CHG or changes in the interventions of those subgrantees.

Subcontracts where subgrantees further subgrant CHG funds (i.e. sub subcontracts) must meet the requirements listed above.

#### 2.2.3.1 Subgrantee Risk Assessment and Monitoring

This section applies to the CHG contracting entities.

#### 2.2.3.2 Subgrantee Performance Requirements

Housing outcome performance requirements must be included in CHG subgrantee agreements for applicable intervention types.

### 2.2.4 Eviction Prevention By and For Organization Subgrant Requirement

At least 10 percent of the Eviction Prevention total award must be subgranted to By and For Organizations. Subgrant activities may include the full scope of homelessness prevention program activities.

By and For Organizations are operated by and for the communities they serve. Their primary mission and history is serving a specific community. They are culturally based, directed, and substantially controlled by individuals from the population they serve. At the core of their programs, these organizations embody the community's central cultural values. In the affordable housing context, these communities must have demonstrated disproportionate representation in homelessness, housing instability, and housing affordability.

- ✓ Black, Indigenous, or other People of Color including people identified as socially disadvantaged as defined in 13 CFR Sec. 124.103.
- ✓ People with disabilities*

- ✓ People who identify as part of the d/Deaf and hard of hearing community
- ✓ People with behavioral health conditions, including substance use disorder.
- ✓ People who identify as LGBTQIA+**
- ✓ Survivors of family violence and/or intimate partner violence.
- ✓ Incarcerated and formerly incarcerated individuals.
- ✓ Undocumented individuals, immigrants and refugees, and mixed-immigration-status families and communities.

*The term disability means: (1) a person who has a physical or mental impairment that substantially limits one or more major life activities, (2) a person with a record of a physical or mental impairment that substantially limits one or more major life activities, and (3) a person who is regarded as having a physical or mental impairment that substantially limits one or more major life activities. This may include, but is not limited to: people with physical disabilities, people with chronic health conditions, and/or people who are neurodivergent.

**LGBTQIA+ is an acronym for lesbian, gay, bisexual, transgender, queer, intersex, asexual and other identities including but not limited to: two-spirit, non-binary, pansexual, agender, etc.

### 2.2.5 By and For Engagement

This section applies to the CHG contracting entities.

### 2.2.6 Complaint Procedure

Lead/subgrantees must have a Complaint Procedure as outlined in Section 7.10.

### 2.2.7 Financial Review Recommendation

This section applies to the CHG contracting entities.

### 2.2.8 Notification to Commerce

Subgrantees must notify their CHG contracting entity within two business days of becoming aware of any of the following events involving a project funded by CHG:

- ✓ Loss of property - for example, emergency shelter closure, even if it was not funded by CHG
- ✓ Litigation – any lawsuits or legal actions related to CHG-funded services
- ✓ Health code violations – any violations reported by local or state health departments

## 2.3 Fiscal Administration

### 2.3.1 Budget Categories and Allowable Expenses

CHG funds are made by budget category, and funds cannot be moved between budget categories.

The following table maps the budget categories to the allowable expenses.

| Budget Category | Budget Line Item | Allowable Expenses - linked to relevant sections of the Guidelines |
|---|---|---|
| Standard | Standard Admin | Administration |
| | Standard Rent | Rent |
| | Standard Facility Support | Facility Support |
| | Standard Operations | Operations, including Flexible Funding |
| PSH CHF | PSH CHF Rent/Fac Support | Rent and Facility Support |
| | PSH CHF Operations | Operations, including Flexible Funding |
| HEN | HEN Admin | Administration |
| | HEN Rent/Fac Support | Rent and Facility Support |
| | HEN Operations | Operations, including Flexible Funding |
| Homeless-ness Prevention | Homelessness Prevention Admin | Administration |
| | Homelessness Prevention Rent | Rent |
| | Homelessness Prevention Operations | Operations, including Flexible Funding |
| Emergency Housing | Emergency Housing Admin | Administration |
| | Emergency Housing Rent | Rent |
| | Emergency Housing Facility Support | Facility Support |
| | Emergency Housing Operations | Operations, including Flexible Funding |
| DRF Backfill | DRF Backfill | Administration<br>Rent<br>Facility Support<br>Operations, including Flexible Funding |
| Inflationary Increase | Inflation | Administration<br>Rent<br>Facility Support<br>Operations, including Flexible Funding |

### 2.3.2 Administration Cost Limits

Administration costs are capped at 15 percent for all of the budget categories:

**Standard & PSH CHF**

- ✓ Each subgrantee: Up to 15 percent of individual grants may be allocated to administration.

**HEN, Homelessness Prevention, and Emergency Housing**

- ✓ Each subgrantee: Up to 15 percent of individual grants may be allocated to administration.

### 2.3.3 Reimbursements

No payments in advance or in anticipation of services to be provided under the grant will be made by Commerce.

Reimbursements can only be made for costs that have been paid in full by the Lead grantee or their subgrantee.

Travel for program outreach and attendance at trainings or conferences (economy airfare, other transportation, lodging and food necessary during periods of required travel) can be reimbursed in accordance with the State of Washington Office of Financial Management Travel Regulations. Employee commutes to and from their regular work location, even if related to travel, are not reimbursable. Any single travel related expense over $50 must have a receipt submitted with the reimbursement request. Lodging receipts must identify the name of the approved traveler and the room rate shown separately from taxes and fees.

#### 2.3.3.1 Back-up Documentation

See Section 2.3.3 for travel related back-up documentation requirements.

### 2.3.4 Budget Revisions

This section applies to the CHG contracting entities.

# 3 Homelessness Assistance

## 3.1 Homelessness Assistance Allowable Interventions

All housing intervention definitions can be found in Section 1.4. Allowable interventions are dependent on the funding source; refer to the chart in Section 1.1.

### 3.1.1 Temporary Housing Interventions

- ✓ Emergency Shelter (ES)
  - Drop-in Shelter
  - Continuous-stay Shelter
- ✓ Transitional Housing (TH)

### 3.1.2 Permanent Housing Interventions

- ✓ Rapid Re-Housing (RRH)
- ✓ Permanent Supportive Housing (PSH)

### 3.1.3 Services Only Interventions

- ✓ Street Outreach

## 3.2 Homelessness Assistance Household Eligibility

A household is one or more individuals seeking to obtain housing together. The entire household must be considered for eligibility determination and services. A household does not include friends or family that are providing temporary housing. Refer to Appendix E: Household Eligibility Requirements.

A household's primary nighttime residence, where they sleep the majority of the time, is used for determining eligibility.

A household's current nighttime residence, where they slept last night, is used for determining HMIS project entry.

Eligible households for homelessness assistance must meet both housing status and income requirements as detailed in the following sections. Permanent Supportive Housing for Chronically Homeless Families (PSH CHF) has additional eligibility requirements, see Section 3.2.1.

| Housing Status | | Income* |
|---|---|---|
| Homeless | AND | At or below 50% area median income at entry |

*Household income must not exceed 80 percent of area median income. Lead grantees may determine to target households with a lower area median income.

### 3.2.1 Permanent Supportive Housing for Chronically Homeless Families (PSH CHF)

Eligibility for PSH CHF:

- ✓ Head of household (HOH) must meet housing status detailed below and have a disability as defined in Section 3.8, and

- ✓ Household must meet income status and have dependents. Dependent is defined as any household member who is not the head, co-head, or spouse, but is: under the age of 18 years; disabled (of any age); or a full-time student (of any age).

| Housing Status | | Income* |
|---|---|---|
| HOH Chronically Homeless | AND | At or below 50% area median income at entry |

*Household income must not exceed 80 percent of area median income. Lead grantees may determine to target households with a lower area median income.

## 3.3 Homelessness Assistance Housing Status Eligibility

### 3.3.1 Homeless

Households are homeless if they are unsheltered or residing in a temporary housing program, as defined below.

#### 3.3.1.1 Unsheltered Homeless:

- ✓ Living outside or in a place that is not designed for, or ordinarily used as, regular sleeping accommodation for human beings, including a vehicle, park, abandoned building, bus or train station, airport, or campground.
- ✓ Fleeing or attempting to flee domestic violence, dating violence, sexual assault, stalking, human trafficking, or other dangerous or life-threatening conditions that relate to violence against the household member(s), including children, that have either taken place within the household's primary nighttime residence or has made the household member(s) afraid to return to their primary nighttime residence.

Programs with federal funding must adhere to the federal housing status eligibility.

#### 3.3.1.2 Sheltered Homeless:

- ✓ Residing in a temporary housing program including shelters, transitional or interim housing, and hotels and motels paid for by charitable organizations or government programs.
- ✓ Exiting a system of care or institution where they resided for 90 days or less AND who resided in an emergency shelter or place not meant for human habitation immediately before entering that system of care or institution.
- ✓ Residing in a trailer or recreational vehicle that is parked illegally or in a location that is not intended for long-term stays (i.e. parking lots).

Programs with federal funding must adhere to the federal housing status eligibility.

### 3.3.2 Chronically Homeless[4]

1. A homeless individual with a disability[5] who:

[4] Section 3.3.2 summarizes HUD's definition of chronically homeless. Refer to 24 CFR part 578 for the full definition.
[5] Refer to Section 3.8 of the guidelines to read more on disability.

- ✓ Lives in a place not meant for human habitation or in an emergency shelter; and
- ✓ Has been homeless (as described above) continuously for at least 12 months or on at least 4 separate occasions in the last 3 years where the combined occasions must total at least 12 months.
  - Occasions separated by a break of at least seven nights.
  - Stays in an institution of fewer than 90 days do not constitute a break.

2. An individual who has been residing in an institutional care facility for fewer than 90 days and met all of the criteria in paragraph (1) of this definition, before entering that facility; or
3. A family with an adult head of household (or if there is no adult in the family, a minor head of household) who meets all of the criteria in (1) or (2) of this definition, including a family whose composition has fluctuated while the head of household has been homeless.

Programs with federal funding must adhere to the federal housing status eligibility.

## 3.4 Homelessness Assistance Documentation of Housing Status

Lead/subgrantees must verify and document eligible housing status prior to program entry. Refer to the *CHG Verification of Household Eligibility and Income Recertification Form* for allowable documentation.

The *CHG Verification of Household Eligibility and Income Recertification Form* and housing status documentation must be kept in the client file. Documentation must be dated within 30 days of program entry.

### 3.4.1 Housing Status Eligibility Exemption

Households entering emergency shelter are exempt from housing status requirements.

Programs with federal funding must adhere to the federal documentation requirements.

## 3.5 Homelessness Assistance Income Eligibility

The combined household income must not exceed 50[6] percent of area median gross income as defined by HUD for Emergency Shelter, Transitional Housing, and Street Outreach. The combined household income must not exceed 50[7] percent of area median gross income as defined by HUD for Rapid Re-Housing, Homelessness Prevention, and Permanent Supportive Housing.

For Rapid Re-Housing, exceptions may be requested on a case-by-case basis to approve household income up to 60% AMI. An Income Eligibility Waiver Request form is required to document and approve requests for income eligibility exception.

- Put completed Income Eligibility Waiver Request in household file, together with income documentation and any other supporting documentation.
- Submit copy of Waiver Tracking Sheet to funder with each quarterly invoice, to include date of request, household size, monthly income amount and % of AMI, and client UID.

Lead grantees can determine to target households with a lower area median income.

[6] This may be higher than requirements for other fund sources. ESG sets income eligibility at 30% AMI.
[7] This may be higher than requirements for other fund sources. ESG sets income eligibility at 30% AMI.

Income limits are based on Area Median Income (AMI) which can be located for each county at: www.huduser.gov (Data Sets, Income Limits).

HUD anticipates that the 2026 income limits will be published in April 2026 at www.huduser.gov

**2025 Income Limits for King County**

*Effective July 1, 2025*

| Household Size | 1 | 2 | 3 | 4 | 5 | 6 | 7 | 8 |
|---|---|---|---|---|---|---|---|---|
| Very Low (50%) | 55,000 | 62,850 | 70,700 | 78,550 | 84,850 | 91,150 | 97,450 | 103,700 |

Income is money that is paid to, or on behalf of, any household member. Income includes the current gross income (annualized) of all adult (18 years and older) household members and unearned income attributable to a minor. Income eligibility determinations are based on the household's income at program entry. Income inclusions and exclusions are listed in the Electronic Code of Federal Regulations, www.ecfr.gov, Title 24 – Housing and Urban Development: Subtitle A 0-99: Part 5: Subpart F: Section 5.609 Annual Income.

***Gross Income*** is the amount of income earned before any deductions (such as taxes and health insurance premiums) are made.

***Current Income*** is the income that the household is currently receiving. Income recently terminated should not be included.

### 3.5.1 Income Eligibility Exemptions

Income eligibility verification is never required for Drop-in Shelter or for households receiving only flexible funding.

The following are exempt from income eligibility requirements for the first 90 days of program participation:

- ✓ Households entering Transitional Housing
- ✓ Households entering a Rapid Re-Housing program
- ✓ Households entering a Continuous-stay Shelter

Households residing in Domestic Violence Shelters past 90 days may be exempt from income requirements on a case-by-case basis, as determined by the lead/subgrantee, if needed to ensure safety of the household.

Households receiving Temporary Assistance for Needy Families (TANF) or General Assistance (GA)/Aged, Blind or Disabled Cash Program (ABD) must not have their cash benefits count towards income.

## 3.6 Homelessness Assistance Documentation of Income Eligibility

Lead/subgrantees must verify and document income eligibility prior to program entry.

*CHG Verification of Household Eligibility and Income Recertification Form*, all allowable income

documentation, and the *CHG Income Eligibility Worksheet* (or equivalent) must be kept in the client file. Documentation must be dated within 30 days.

Adult household members with no income must complete a *CHG Self-Declaration Form*.

### 3.6.1 Annualizing Wages and Periodic Payments

Use the *CHG Income Eligibility Worksheet* (or equivalent) to calculate income based on hourly, weekly, or monthly payment information. Add the gross amount earned in each payment period that is documented and divide by the number of payment periods. This provides an average wage per payment period. Depending on the schedule of payments, use the following calculations convert the average wage into annual income:

- ✓ Hourly wage multiplied by hours worked per week multiplied by 52 weeks.
- ✓ Weekly wage multiplied by 52 weeks.
- ✓ Bi-weekly (every other week) wage multiplied by 26 bi-weekly periods.
- ✓ Semi-monthly wage (twice a month) multiplied by 24 semi-monthly periods.
- ✓ Monthly wage multiplied by 12 months.

The *CHG Income Eligibility Worksheet* is not required for households that have no income or receive only Temporary Assistance for Needy Families (TANF) or General Assistance (GA)/Aged, Blind or Disabled Cash Program (ABD).

## 3.7 Homelessness Assistance Eligibility Recertification

Subgrantees must document recertification of household income eligibility at least every three months using the *CHG Verification of Household Eligibility and Income Recertification Form*.

At time of income eligibility recertification, the combined household income must not exceed 80 percent[8] of area median income (AMI) as defined by HUD for continuous stay shelters, transitional housing and rapid rehousing.

Income recertification is not required for Drop In Shelters, Standard PSH, or PSH CHF.

### 3.7.1 Income Ineligible at Recertification

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

## 3.8 Additional Eligibility Requirements for Permanent Supportive Housing

To be eligible for Standard PSH, a household must be homeless (as defined in Section 3.3.1) AND include at least one household member who has a disability.

To be eligible for PSH CHF, the head of household must meet homelessness and disability criteria identified in the definition of chronically homeless in Section 3.3.2.

Disabilities are expected to be long-continuing or indefinite in duration and sustainability impedes the

[8] This may be higher than requirements for other fund sources. ESG sets income eligibility at 30% AMI.

household member's ability to live independently.

Disability includes: a physical, developmental, mental, or emotional impairment, including impairment caused by alcohol or drug abuse, post-traumatic stress disorder, or brain injury. A person will also be considered to have a disability if he or she has Acquired Immune Deficiency Syndrome (AIDS) or any conditions arising from the etiologic agent for 86 Acquired Immune Deficiency Syndrome, including infection with the Human Immunodeficiency Virus (HIV).

### 3.8.1 Documentation of a Disability

Subgrantees must verify and document the disability prior to program entry. Acceptable documentation of the disability must include one the following:

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

*CHG Verification of Household Eligibility and Income Recertification Form* and all allowable disability documentation must be kept in the client file. If unable to document disability at program entry with the above methods, program staff must record observation of disability. Required documentation (above) must be obtained within 45 days of program enrollment.

### 3.8.2 Maintaining Homeless Status for Permanent Housing

While receiving Rapid Re-Housing assistance, households maintain their homeless status for purposes of eligibility for other permanent housing placements.

# 4 Homelessness Prevention

## 4.1 Homelessness Prevention Allowable Housing Intervention

All housing intervention definitions can be found in Section 1.4. Allowable interventions are dependent on the budget categories; refer to the chart in Section 1.1.

### 4.1.1 Permanent Housing Interventions

- ✓ Homelessness Prevention (HP)

## 4.2 Homelessness Prevention Household Eligibility

A household is one or more individuals seeking to obtain or maintain housing together. The entire household must be considered for eligibility determination and services. A household does not include friends or family that are providing temporary housing. Refer to Appendix E: Household Eligibility Requirements.

A household's primary nighttime residence, where they sleep the majority of the time, is used for determining eligibility.

A household's current nighttime residence, where they slept last night, is used for determining HMIS project entry.

Eligible households for homelessness prevention must meet both housing status and income requirements as detailed in the following sections.

| Housing Status | | Income* |
|---|---|---|
| At Risk of Homelessness | AND | At or below 80% area median income |

*Household income must not exceed 80 percent of area median income. Lead grantees may determine to target households with a lower area median income.

## 4.3 Homelessness Prevention Housing Status Eligibility

### 4.3.1 At Risk of Homelessness

Households are at risk of homelessness if they meet one of the following conditions:

- ✓ Have a missed rent payment and currently owe all or part of a rent payment (current month or past months); OR
- ✓ Has moved because of economic reasons 2 or more times during the 60 days immediately preceding the application for assistance; OR
- ✓ Is living in the home of another because of economic hardship; OR
- ✓ Has been notified that their right to occupy their current housing or living situation will be terminated within 21 days after the date of application for assistance; OR
- ✓ Lives in a hotel/motel and the cost is not paid for by charitable organizations or by Federal,

State, or local government programs for low-income individuals; OR

- ✓ Lives in an SRO or efficiency apartment unit in which there reside more than 2 persons or lives in a larger housing unit in which there reside more than one and a half persons per room; OR
- ✓ Is exiting a publicly funded institution or system of care.

## 4.4 Homelessness Prevention Documentation of Housing Status

Lead/subgrantees must verify and document eligible housing status prior to program entry. Refer to the *CHG Verification of Household Eligibility and Income Recertification Form* for allowable documentation.

The *CHG Verification of Household Eligibility and Income Recertification Form* and housing status documentation must be kept in the client file. Documentation must be dated within 30 days of program entry.

### 4.4.1 Targeted Prevention

Homelessness prevention programs must prioritize households most likely to become homeless and must use either the *CHG Targeted Prevention Eligibility Screening Form* or other tool approved by Commerce. This form must be kept in the client file.

If modifying the *CHG Targeted Prevention Eligibility Screening Form* or using another tool, the risk factors must be evidence informed. Submit the screening tool to your Commerce grant manager for approval.

## 4.5 Homelessness Prevention Income Eligibility

The combined household income must not exceed 80 percent of area median gross income as defined by HUD. Lead grantees can determine to target households with a lower area median income.

Income limits are based on Area Median Income (AMI) which can be located for each county at: www.huduser.gov (Data Sets, Income Limits).

Income is money that is paid to, or on behalf of, any household member. Income includes the current gross income (annualized) of all adult (18 years and older) household members and unearned income attributable to a minor. Income eligibility determinations are based on the household's income at program entry. Income inclusions and exclusions are listed in the Electronic Code of Federal Regulations, www.ecfr.gov, Title 24 – Housing and Urban Development: Subtitle A 0-99: Part 5: Subpart F: Section 5.609 Annual Income.

***Gross Income*** is the amount of income earned before any deductions (such as taxes and health insurance premiums) are made.

***Current Income*** is the income that the household is currently receiving. Income recently terminated should not be included.

### 4.5.1 Income Eligibility Exemptions

Income eligibility verification is never required for households receiving only flexible funding.

Households receiving Temporary Assistance for Needy Families (TANF) or General Assistance

(GA)/Aged, Blind or Disabled Cash Program (ABD) must not have their cash benefits count towards income.

## 4.6 Homelessness Prevention Documentation of Income Eligibility

Lead/subgrantees must verify and document income eligibility prior to program entry.

*CHG Verification of Household Eligibility and Income Recertification Form*, all allowable income documentation, and the *CHG Income Eligibility Worksheet* (or equivalent) must be kept in the client file. Documentation must be dated within 30 days.

Adult household members that have no income are required to complete a *CHG Self-Declaration Form*.

### 4.6.1 Annualizing Wages and Periodic Payments

Use the *CHG Income Eligibility Worksheet* (or equivalent) to calculate income based on hourly, weekly, or monthly payment information. Add the gross amount earned in each payment period that is documented and divide by the number of payment periods. This provides an average wage per payment period. Depending on the schedule of payments, use the following calculations convert the average wage into annual income:

- ✓ Hourly wage multiplied by hours worked per week multiplied by 52 weeks.
- ✓ Weekly wage multiplied by 52 weeks.
- ✓ Bi-weekly (every other week) wage multiplied by 26 bi-weekly periods.
- ✓ Semi-monthly wage (twice a month) multiplied by 24 semi-monthly periods.
- ✓ Monthly wage multiplied by 12 months.

The *CHG Income Eligibility Worksheet* is not required for households that have no income or receive only Temporary Assistance for Needy Families (TANF) or General Assistance (GA)/Aged, Blind or Disabled Cash Program (ABD).

## 4.7 Homelessness Prevention Eligibility Recertification

Lead/subgrantees must document recertification of household income eligibility at least every three months using the *CHG Verification of Household Eligibility and Income Recertification Form*.

### 4.7.1 Income Ineligible at Recertification

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

## 4.8 Landlords Applying for Homelessness Prevention Assistance on Behalf of Tenant

Lead/subgrantees must allow landlords to initiate a request for assistance on behalf of their tenants by completing the *Certification of Payment Obligation Form.* Eligibility is based on tenant eligibility. At minimum, a reasonable attempt to contact the tenant must be made by the lead/subgrantee using the information provided from the landlord. The lead/subgrantee must create a process for what is reasonable based on the agency and staffing capacity.

# 5 Housing and Essential Needs

## 5.1 Allowable Interventions

All housing intervention definitions can be found in Section 1.4. Allowable interventions are dependent on the budget category; refer to the chart in Section 1.1.

### 5.1.1 Temporary Housing Interventions

- ✓ Transitional Housing (TH)

### 5.1.2 Permanent Housing Interventions

- ✓ Homelessness Prevention (HP)
- ✓ Rapid Re-Housing (RRH)
- ✓ Permanent Supportive Housing (PSH)

### 5.1.3 Services Only Interventions

- ✓ Street Outreach

## 5.2 HEN Household Eligibility

A household is one or more individuals seeking to obtain or maintain housing together. A household does not include friends or family that are providing temporary housing. Refer to Appendix E: Household Eligibility Requirements.

A household's primary nighttime residence, where they sleep the majority of the time, is used for determining eligibility.

A household's current nighttime residence, where they slept last night, is used for determining HMIS project entry.

Eligible HEN households must meet both housing status and income requirements as detailed in the following sections.

| Housing Status | | Income |
|---|---|---|
| Homeless<br>OR<br>At Risk of Homelessness | AND | HEN Referral[9]<br>OR<br>Lost HEN Referral due to receiving federal supplemental security income, social security disability income, or social security retirement income and still has an *immediate housing need |

*Immediate housing need is determined through housing stability planning and assessment (see Sections 5.7 and 7.5).

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

## 5.3 HEN Housing Status Eligibility

### 5.3.1 Homeless

Households are homeless if they are unsheltered or residing in a temporary housing program, as defined below.

#### 5.3.1.1 Unsheltered Homeless:

- ✓ Living outside or in a place that is not designed for, or ordinarily used as a regular sleeping accommodation for human beings, including a vehicle, park, abandoned building, bus or train station, airport, or campground.
- ✓ Fleeing or attempting to flee domestic violence, dating violence, sexual assault, stalking, human trafficking, or other dangerous or life-threatening conditions that relate to violence against the household member(s), including children, that have either taken place within the household's primary nighttime residence or has made the household member(s) afraid to return to their primary nighttime residence.

#### 5.3.1.2 Sheltered Homeless:

- ✓ Residing in a temporary housing program including shelters, transitional or interim housing, and hotels and motels paid for by charitable organizations or government programs.
- ✓ Exiting a system of care or institution where they resided for 90 days or less AND who resided in an emergency shelter or place not meant for human habitation immediately before entering that system of care or institution.
- ✓ Residing in a trailer or recreational vehicle that is parked illegally or in a location that is not intended for long-term stays (i.e. parking lots).

### 5.3.2 At Risk of Homelessness

Households are at risk of homelessness if they meet one of the following conditions:

- ✓ Have a missed rent payment and currently owe all or part of a rent payment (current month or past months); OR
- ✓ Has moved because of economic reasons 2 or more times during the 60 days immediately preceding the application for assistance; OR
- ✓ Is living in the home of another because of economic hardship; OR
- ✓ Has been notified that their right to occupy their current housing or living situation will be terminated within 21 days after the date of application for assistance; OR
- ✓ Lives in a hotel/motel and the cost is not paid for by charitable organizations or by Federal, State, or local government programs for low-income individuals; OR
- ✓ Lives in an SRO or efficiency apartment unit in which there reside more than 2 persons or lives in a larger housing unit in which there reside more than one and a half persons per room; OR
- ✓ Is exiting a publicly funded institution or system of care.

## 5.4 HEN Documentation of Housing Status

Lead/subgrantees must verify and document eligible housing status prior to program entry. Refer to the *CHG Verification of Household Eligibility and Income Recertification Form* for allowable documentation.

The *CHG Verification of Household Eligibility and Income Recertification Form* and housing status documentation must be kept in the client file. Documentation must be dated within 30 days of program entry.

### 5.4.1 Targeted Prevention

HEN programs offering homelessness prevention assistance must prioritize households most likely to become homeless and must use either the *CHG Targeted Prevention Eligibility Screening Form* or other tool approved by Commerce. This form must be kept in the client file.

If modifying the CHG Targeted Prevention Eligibility Screening Form or using another tool, the risk factors must be evidence informed. Submit the screening tool to your Commerce grant manager for approval.

## 5.5 HEN Referral

### 5.5.1 Documentation of HEN Referral[10]

In place of income verification, lead/subgrantees must verify and document the household's HEN Referral from the Washington State Department of Social and Health Services (DSHS) as documented in the Benefits Verification System (BVS) prior to program entry.

The *CHG Verification of Household Eligibility and Income Recertification Form* and HEN Referral documentation must be kept in the client file.

For Pregnant Women Assistance (PWA) recipients with a HEN Referral, BVS will only display active PWA households. If a household is no longer on the program (e.g. birth of baby), BVS will no longer display an active status. Contact your Commerce CHG program manager to help determine PWA status. The referral to HEN remains valid for 24 consecutive months.

## 5.6 HEN Referral Status Recertification

Subgrantees must recertify a household's HEN Referral from DSHS, as documented in the BVS, every 12 months. The 12-month recertification timeline is based on the **start date of rent assistance**, typically the month the household moves into housing. Both the HEN Referral and updated *CHG Verification of Household Eligibility and Income Recertification Form* must be kept in the client file.

Recertification is not required for HEN households who are a PWA recipient up to 24 months.

**Example Timeline:**

- ✓ A household is determined HEN-eligible in **May.**
- ✓ The household moves into a housing and begins receiving rent assistance in **July.**
- ✓ The process would be:
  - May: **Initial eligibility is verified** at the time of HEN referral.
  - July: A **second verification** of the HEN Referral is completed before rent assistance begins to confirm continued eligibility at move-in.

[10] HEN Referral includes households who have a HEN Referral and households enrolled in General Assistance (ABD recipient) and General Assistance Pregnancy (Pregnant Women Assistance recipient) from DSHS as documented in BVS.

- Every July thereafter: **Annual recertification is required, based on the move-in month,** as long as the household remains enrolled in the HEN rent assistance program.

This example timeline ensures eligibility is verified both at the start of rent assistance and annually thereafter, aligned with the period when financial support is provided.

Outside of the annual recertification, providers should regularly check BVS to monitor the household's HEN Referral status. This helps programs effectively prepare households for transitioning off of HEN rent assistance.

**Note:** Households who lose their HEN Referral due to receiving federal supplemental security income, social security disability income, or social security retirement income may remain eligible for rent assistance if they have an immediate housing need. See Section 5.8.1 for details.

## 5.7 Rent Subsidy Determination and Housing Stability Planning

HEN programs must provide ongoing housing stability planning and assessment through a progressive engagement service model, as outlined in Section 7.5. As part of this model, programs must define in their policies and procedures when income is reviewed during housing stability planning and assessment with households. All household income should be considered in the review, but programs are not required to implement an income limit to determine eligibility.

If any household member gains employment or experiences a change in income between recertification periods, grantees should conduct an interim income review to ensure the level of rent assistance remains appropriate. Programs must implement a Rent Subsidy Determination Policy, as described in Section 8.3 which includes use of a *Rent Subsidy Calculation Tool* for all households. When a HEN household member receives income, the rent subsidy determination is reassessed. TANF or GA/ABD benefits must be excluded from household rent contributions.

## 5.8 HEN Referral Inactive at Recertification

HEN rent assistance cannot be provided If a household does not have an active HEN Referral at the time of their 12-month recertification.

**Exception:** HEN rent assistance may continue only if the household lost their HEN Referral due to receiving federal supplemental security income, social security disability income, or social security retirement income and continues to have an immediate housing need. See Section 5.8.1.

See Section 5.7 for households who have an active HEN Referral and are receiving earned income during a 12-month eligibility period.

For households who do not qualify for continued HEN assistance, providers should consider using other CHG budget categories, such as Standard or Homelessness Prevention, to help support the household's transition to stability. If other CHG budget categories are used to support a household ineligible for HEN, the household may receive assistance through the alternative budget source as long as they meet the associated eligibility criteria.

### 5.8.1 HEN Referral Inactive at Recertification: Households Receiving SSI, SSDI, or SSRI

HEN rent assistance may continue when the household lost their HEN Referral due to receiving federal supplemental security income, social security disability income, or social security retirement income and continues to have an immediate housing need.

Immediate housing need is determined through housing stability planning and assessment as described in Section 7.5.

## 6 Allowable Expenses

The following allowable expenses are for all CHG budget categories. Review the table in Section 2.3.1 that maps the budget line items to the allowable expenses.

### 6.1 Rent

- ✓ Monthly rent 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. Monthly rent is not time limited.
  - Rental arrears for up to six months and associated late fees. Rental arrears may be paid if the payment enables the household to obtain or maintain permanent housing. If funds are used to pay rental arrears, arrears must be included in determining the total period of the household's rental assistance. For all rental arrear payments of $2,000 or more client file documentation is required to show attempts to negotiate a reduced payment amount. Rental arrears are any missed rent payment currently owed (full or partial), including the current month or past months.
  - ✓ Rental arrears for HEN households can be paid for a time period prior to the HEN Referral.
  - ✓ Note that rental arrears can be paid on behalf of a household receiving an on-going subsidy from another public program (e.g., Section 8) because it represents a different time period and cost type than the rental subsidy.
- ✓ Lot rent for RV or manufactured home.
- ✓ Costs of parking spaces when connected to a unit.
- ✓ Landlord incentives, including reimbursements for damages paid to a landlord (provided there are written policies and/or procedures explaining what constitutes landlord incentives, how they are determined, and who has approval and review responsibilities).
- ✓ Security deposits for households moving into new units. Any security deposit payments greater than two months' rent must be pre-approved by King County and cannot be paid from federal funds.
- ✓ Hotel/Motel expenses when used as permanent housing or when used as Emergency Shelter for up to 90 days if no suitable shelter option is available. Utilities that are included in rent.
- ✓ Landlord administrative fees required with rent.
- ✓ Utility payments for households also receiving rental assistance. (Electric, natural gas, phone, internet, water and sewer, garbage removal).
- ✓ Utility arrears for up to six months may be paid if the payment enables the household to obtain or maintain permanent housing. Utility arrears are not time limited.
- ✓ 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 *Utility-Only Assistance Form*. Utility-only assistance means the household is not receiving rent assistance.
- ✓ Utility deposits for a household moving into a new unit.
- ✓ Application fees, background, credit check fees, and costs of urinalyses for drug testing of household members if necessary/required for rental housing.
- ✓ Rental insurance when required by lease.
- ✓ Other costs as approved by King County.

#### Rapid Re-Housing Rent Assistance Exceptions

Occasionally, situations come up that put an extra, unexpected financial burden on a household. When that happens, programs can use the Rental Assistance Hardship Request Form to request additional financial support from the program to help the household remain stably housed.

A Rental Assistance Hardship Request form is required to document requests for additional financial support due to any of the following circumstances:

**No re-authorization required from CHG contracting entity:**

- ✓ Client has income but cannot afford to pay 60% of income towards rent (or 30% in month two).
- ✓ Client does not have income after 6 months of receiving 100% rental subsidy.
- ✓ Client cannot take over full rent after 12 months of rental subsidy.
- ✓ Client needs an additional month of partial subsidy after increasing income to 60% rent to income ratio.
- ✓ Payment of back rent, costs and/or fees arising from client not paying their share of rent on time.
- ✓ Move outside of King County; or
- ✓ Client has exited rental subsidy but needs emergency rental assistance during the two-month follow-up period.

**Requests that require written pre-authorization from CHG contracting entity:**

- ✓ Client needs to move to a new unit; (request for second payment of first/last & deposit).
- ✓ Client cannot take over full rent after 24 months of rental subsidy.
- ✓ 90+ days of rental subsidy outside of King County; or
- ✓ Rent arrears over the limit described by the funding contract.

**Put completed Hardship Request in household file; together with:**

- ✓ Rapid re-housing subsidy and re-assessment calculation form.
- ✓ Rapid re-Housing 90-day Re-Assessment form; and
- ✓ Any other supporting documentation.

**For a second move in, client file documentation to also include:**

- ✓ Itemization of move-in cost amounts paid from first move-in and anticipated cost of second move-in.

**For a move outside of King County, client file documentation to also include a detailed plan describing:**

- ✓ Plan for increasing income so that client can sustain the rent within 90 days of move-in.
- ✓ Plan for how case management and maintaining client contact will be addressed.
- ✓ Description of the support network at place moving to.
- ✓ Plan for how transportation and moving costs would be paid.
- ✓ Verification of unit habitability; and
- ✓ Copy of county parcel viewer report for the property, including owner's name.

**Submit copy of Tracking Sheet to funder with each invoice, to include:**

- ✓ Date of request
- ✓ Client ID
- ✓ Type of hardship
- ✓ Dollar amounts requested.

### 6.1.1 Special Circumstances

- ✓ Global lease (also known as master lease or supportive lease): Security deposit and monthly rent is allowable when an organization leases a unit, and then sub-leases the unit to eligible households in the context of a Rapid Re-Housing or Permanent Supportive Housing program.
- ✓ 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), lead/subgrantees may continue to pay for the household's rent. The service provider must determine their own policies and procedures regarding temporary absences, including the length of time a household can be away from the unit. While a household is temporarily absent, they may continue to receive case management. Any temporary absence details must be documented in the client 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.[11] Rental arrears or utility arrears assistance may be used for subsidized housing.

### 6.1.2 Ineligible Expenses

- ☒ Ongoing rent/utilities for subsidized housing
- ☒ Cable/internet/phone deposits or services
- ☒ Mortgage assistance and utility assistance for homeowners
- ☒ Any costs attributed to facility-based or operating expenses, including "rent" amounts attributed to individual units occupied by program participants, when grantee/subgrantee owns the property.

## 6.2 Facility Support

- ✓ Lease or rent payment on a building used to provide temporary housing or permanent supportive housing
- ✓ Hotel/Motel expenses to provide temporary housing for less than 90-days when no suitable shelter bed is available
- ✓ Move-in costs (security deposits, first and last month's rent) for permanent housing
- ✓ Utilities (gas/propane, phone, electric, internet, water and sewer, garbage removal)
- ✓ Maintenance (janitorial/cleaning supplies, pest control, fire safety, materials and contract or staff maintenance salaries and benefits-including overtime and bonus pay-associated with providing the maintenance, mileage for maintenance staff)
- ✓ Security and janitorial (salaries and benefits-including overtime and bonus pay-associated with providing security, janitorial services)
- ✓ Essential facility equipment and supplies (e.g. common-use toiletries, bedding, mats, cots, towels, microwave, pet food and crates, etc.)
- ✓ Expendable transportation costs directly related to the transportation of eligible households

[11] In this context tax credit units are not considered subsidized housing.

(bus tokens and fuel for a shelter van)
- ✓ On-site and off-site management costs related to the building
- ✓ Facility specific insurance (mortgage insurance is not allowable) and accounting
- ✓ Costs for securing permanent housing (application fees, background check fees, credit check fees, utility deposits, and costs of urinalyses for drug testing of household members if necessary/required for housing)
- ✓ Other expenses as approved by King County

### 6.2.1 Special Circumstances

- ✓ Global lease (formerly known as master lease): Facility costs are allowable when an organization leases a building and then sub-leases the property to eligible households in the context of a Transitional Housing or Permanent Housing program.

### 6.2.2 Ineligible Expenses

- ☒ Replacement or operating reserves
- ☒ Debt service
- ☒ Construction or rehabilitation of shelter facilities
- ☒ Facility support in combination with rent and rent/utility assistance
- ☒ Mortgage payment, including property taxes for the facility

### 6.2.3 HEN Facility Support

Lease payments and other facility costs are allowable with HEN funding for transitional housing (Section 1.4.1.2) and permanent housing (Section 1.4.2). Emergency shelter is not allowable.

HEN facility support must be proportionally billed according to an estimate of the number of HEN households expected to occupy the facility.

### 6.2.4 Maintenance Activities vs. Building Rehabilitation

Building maintenance is an allowable facility support expenses.

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.

Building rehabilitation and capital improvements are not allowable facility support expenses.

These typically include those items that are done building-wide or affect a large portion of the property such as roof replacement, exterior/interior common area painting, major repairs of building

components, etc. See Appendix F: Examples of Maintenance Activities.

## 6.3 Operations

Operations expenses are directly attributable (direct costs) to a particular program or to the homeless crisis response system.

- ✓ Salaries and benefits (including overtime and bonus pay) for staff costs directly attributable to the program or to the homeless system, including but not limited to program staff, information technology (IT) staff, human resources (HR) staff, bookkeeping staff, and accounting staff.
- ✓ Office space, utilities, supplies, phone, internet.
- ✓ Training related to grant management and/or service delivery, including conference attendance and associated registration fees. Travel for program outreach and attendance at trainings or conferences (economy airfare, other transportation, lodging and food necessary during periods of required travel) can be reimbursed in accordance with the State of Washington Office of Financial Management Travel Regulations. Employee commutes to and from their regular work location, even if related to travel, are not reimbursable. Any single travel related expense over $50 must have a receipt submitted with the reimbursement request. Lodging receipts must identify the name of the approved traveler and the room rate shown separately from taxes and fees. Outreach or community event supplies. Food purchases are limited to supplies like bottled water and packaged snacks that are provided directly to individuals experiencing homelessness to facilitate engagement with services.
- ✓ One-time equipment purchases up to $5,000 unless approved in advance by Commerce.

### 6.3.1 Homeless Crisis Response System Expenses

This expense category is limited to King County and King County Regional Homelessness Authority.

### 6.3.2 Program Expenses

- ✓ Intake and assessment, including time spent assessing a household, whether or not the household is determined eligible
- ✓ 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.
- ✓ Housing Search and Placement Services. This includes 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.
- ✓ Mediation and outreach to property owners/landlords related to locating or retaining housing (landlord incentives)
- ✓ Outreach services
- ✓ Optional support services for individuals in permanent supportive housing, including case management and connections to resources
- ✓ Data collection and entry
- ✓ General liability insurance and automobile insurance
- ✓ Other costs as approved in advance by King County

### 6.3.3 Flexible Funding

Flexible Funding (flex funding) is an allowable activity with all CHG budget categories. It provides

financial assistance to households to enhance housing stability or meet essential household needs not covered by other allowable expense categories. Flexible Funding is used for the provision of goods, payments of expenses, or purchase of merchant gift cards or vouchers not included in other allowable expense categories, which helps a household increase housing stability or meet essential household needs. All eligible households are eligible for Flexible Funding up to $5,000 per household.

#### 6.3.3.1 Allowable Expenses

**Housing Stability:** Expenses that directly support a household's housing stability, including but not limited to:

- ✓ Car repairs or vehicle registration to maintain employment. Examples of related eligible costs include minor car repairs, registration tabs, car insurance and oil changes when necessary for obtaining/maintaining permanent housing or to maintain or increase income.
- ✓ Training or certification programs.
- ✓ Legal fees related to housing issues.
- ✓ Payment of past debts with previous landlords to pass housing screenings.
- ✓ Installation of safety measures, like new door locks, for individuals fleeing domestic violence or trafficking.
- ✓ Work required equipment necessary for employment, such as work boots or clothing.
- ✓ Expenses associated with increasing income (such as hair cut for a job interview).
- ✓ Essential veterinary services for pets of households accessing emergency shelter, such as visits for core vaccinations (e.g. rabies, distemper, parvovirus), flea treatment, and sterilization (spay or neuter).
- ✓ Expenses necessary for obtaining/maintaining permanent housing (such as document fees, fines accrued as a result of housing crisis, reasonable moving costs such as truck rental, furniture, bedding, kitchen items, and small appliances).
- ✓ Local transportation such as passes and Lyft/Uber rides when necessary to maintain or increase someone's income (such as to a job or job interview) or achieve or maintain housing stability (such as to view potential housing options, fil out housing applications or to priority medical/health appointments).

**Essential Household Needs:** Items necessary for daily living, including but not limited to:

- ✓ Personal hygiene products.
- ✓ Cleaning supplies.
- ✓ Transportation passes.
- ✓ Items necessary for life or safety to address an essential need (such as food, baby formula, diapers, child car seat, clothing, cleaning supplies, toiletries or food and care for a service animal).
- ✓ Other personal necessities.

☒ Flexible Funding does not include current rent payments or other fees and costs required by a household's lease (e.g. pet fees, parking, garbage, etc.).

#### 6.3.3.2 Eligibility and Documentation

All CHG eligible households are eligible for Flexible Funding. Reference Section 6.3.3.4 for more information about households with a HEN Referral.

**Income:** Verification of income is required for all households, except households receiving only Flexible Funding and not ongoing housing assistance or households with a HEN Referral.

**Housing Status:** Verification of housing status is required for all households, except for households with a HEN Referral who are only receiving essential household needs.

**Documentation:** Eligibility verification must be documented in the client file. Flexible Funding assistance must be documented in the household's housing stability plan, detailing how the assistance addresses the identified need.

#### 6.3.3.3 Payment Procedures

- ✓ Flexible Funding payments must be made directly to a third party on behalf of the household, or
- ✓ Direct cash assistance is allowable in the form of a debit cash card, merchant gift card, cash equivalent card, or voucher.

Payments must be noted in the household's housing stability plan or case notes. Flexible Funding payments must be paid directly to a third party on behalf of the household.

If gift cards or cash equivalent cards are provided to program participants, strong internal controls must be in place. These controls must include:

- ✓ Established written procedures for purchasing, storing (in secure area) and distributing.
- ✓ Maintaining an itemized inventory of all gift cards, including dollar amounts.
- ✓ Keeping a monthly tracking log of all distributed cards.
- ✓ Recording the following details for each card distributed:
  - Client's name and HMIS ID number
  - Purpose of the card
  - Date of distribution
- ✓ Obtaining the client's signature and a signed attestation confirming the card will be used for activities outlined in their housing stability plan.

#### 6.3.3.4 Households with a HEN Referral

- ✓ All households with a HEN Referral, regardless of housing status eligibility, are eligible to receive essential needs items.
- ✓ Distribution of essential needs to HEN households does not require documentation in housing stability plans, except when a gift card or cash equivalent card is provided.

### 6.3.4 Ineligible Expenses

- ☒ Clean-up costs for encampments
- ☒ Providing meals or light refreshments for staff or other community meetings/events.
- ☒ Financial assistance to a program participant who is receiving the same type of assistance through other public sources (either full or partial subsidy).

## 6.4 Administration

Indirect costs should be billed to the Administration budget category.

Allowable administration costs generally benefit the organization and cannot be attributed specifically to a particular program or to the homeless crisis response system. Administration costs may include the same types of expenses that are listed in program operations (such as IT staff and office supplies), in the case that these costs are benefiting the agency as a whole and are not attributed to a particular program or the homeless system.

Administration costs may include, but are not limited to, the following:

- ✓ Executive director salary and benefits
- ✓ General organization insurance
- ✓ Organization wide audits, financial reviews from a third party. Commerce recommends these be conducted at least once every 24 months.
- ✓ Board expenses
- ✓ Organization-wide membership fees and dues
- ✓ General agency facilities costs (including those associated with executive positions) such as rent, depreciation expenses, and operations and maintenance.

All amounts billed to administration by lead and subgrantees must be allowable, supported by actual costs, not double charged, and treated consistently in similar circumstances.

## 7 Requirements for all Housing Interventions[12]

Commerce promotes evidence-based service delivery models that efficiently move people experiencing homelessness into permanent destinations.

See *Seattle and King County Rapid Re-Housing Program Standards* for additional requirements and information for rapid re-housing programs.

### 7.1 Access to Homeless Housing Assistance

Coordinated entry intake must not require identification, social security cards, birth certificates, or other documentation not required by funders. Households experiencing homelessness should be provided temporary housing if available while documentation is being obtained. Flexible Funding can be used to assist homeless households in obtaining required documentation to access housing.

Programs should limit eligibility criteria to those required by funders and/or facility structure (for example, funding for veterans or unit size suitable for families with children).

If you are considering adding eligibility requirements beyond those required herein you must first request approval through your CHG contracting entity.

### 7.2 Voluntary Services

Programs cannot terminate or deny services to households based on refusal to participate in supportive services. Supportive services are helping or educational resources that include support groups, mental health services, alcohol and substance abuse services, life skills or independent living skills services, vocational services and social activities.

Participation in supportive services must be voluntary.

Supportive services do not include housing stability planning or case management.

PSH CHF eligible households must be offered a referral to Foundational Community Supports (FCS). The FCS provider directory can be found here. Households are not required to participate in FCS services.

### 7.3 Choice of Housing

Households have the right to housing choice and can reject housing and service options without retribution or limiting their access to other forms of assistance.

### 7.4 Progressive Engagement

Subgrantees must employ a progressive engagement (PE) service model. Progressive Engagement includes the following components:

- ✓ Whenever possible, households experiencing a housing crisis should be diverted from entering homeless housing programs through problem-solving conversations, linkages to mainstream

[12] See Section 1.4. Allowable Housing Interventions

and natural supports, and/or flexible, and light-touch financial assistance.

- ✓ Initial assessment and services address the immediate housing crisis with the minimal services needed.
- ✓ Frequent re-assessment determines the need for additional services, including rental assistance.
- ✓ Services are individualized and responsive to the needs of each household.
- ✓ Households exit to permanent housing as soon as possible.
- ✓ Having already received assistance does not negatively impact a household's eligibility if they face homelessness again.
- ✓ Services prioritize collaboration and household choice.

Income eligibility recertification can be included in case management and an assessment that determines the need for additional services but should not be considered the only approach to a PE service model.

### 7.4.1 Service Limits

Program policies which set inflexible time limits to program enrollment or fixed amounts of rent assistance a household may receive are not in alignment with progressive engagement and not allowed under this grant.

Programs may set flexible parameters for length of time enrolled in programs or amount of rent assistance provided. Programs that have a goal of transitioning households from assistance after a period of time or amount of assistance provided should communicate this goal clearly and often with households during housing stability planning throughout program enrollment.

No exits to homelessness should occur solely based on reaching a rent or time limit in a program. Program exits should occur when housing stability assessment and planning indicate the household will be able to retain housing after program exit.

## 7.5 Assessment and Housing Stability Planning

Subgrantees must assess each household's housing needs and facilitate planning with the goal of obtaining or maintaining housing stability.

A problem-solving diversion conversation should occur prior to a full, standardized assessment. Assessments consider resources and supports necessary to obtain or maintain housing, including need for short- or long-term rental assistance and flexible funding.

Housing stability planning must be housing-focused, client-driven, and build on the strengths and resources of each household. Planning primarily addresses housing identification, retention, and connections to community resources. The process prioritizes collaboration and client choice before outcomes. Assessments and housing stability planning must be documented, including reassessment and planning throughout project enrollment, which responds to household needs at that point in time. Reassessment may be needed more frequently than during 90-day eligibility recertification.

Policies must describe how often re-assessment is intended to occur, including income review outside of 90-day recertifications.

#### 7.5.1.1 Elements of Housing Stability Planning

All Housing Stability Plans should have key characteristics:

- ✓ Attainable goals
- ✓ Action steps to achieve goals which are clear, measurable, and can be accomplished within a relatively short period of time
- ✓ Case manager and/or household responsibility is designated for each action step
- ✓ Target dates for completion or review of steps and overall plan
- ✓ Assistance, including rent assistance and flexible funding, provided on behalf of the household should be tied to the Housing Stability Plan

#### 7.5.1.2 Stages of Housing Stability Planning

The following stages may be used as a general guide for planning. All households may not need plans that address all stages, and planning will depend on household circumstances and program design.

- ✓ Crisis Resolution Plan: Initial goals focus on resolving immediate crises that jeopardize household safety (e.g. living in vehicle during dangerously cold weather).

- ✓ Short Term Stability Plan: Focuses on intermediate objectives necessary to obtain or maintain permanent housing. Planning in this stage will be revised and adjusted as household needs or circumstances change throughout program enrollment.

  During this stage, reassessments should consider:
  - The length of subsidy to date
  - Household income and household rent to income ratio
  - Household compliance with lease
  - Progress made on housing stability and income goals
  - Changes in household circumstances impacting housing stability
  - Resources and supports still needed to retain housing without rental assistance

- ✓ Post-Program Plan: At program exit, plans may include a continuation of lighter-touch services to be delivered post-enrollment to help ensure housing retention. [13]

Staff-to-client ratios which allow for implementing progressive engagement and personalized and ongoing housing stability planning should be considered in program planning.

## 7.6 Nondiscrimination

Subgrantees must comply with all federal, state and local nondiscrimination laws, regulations and policies, including the Washington State Law against Discrimination, RCW 49.60, as it now reads or as it may be amended. RCW 49.60 currently prohibits discrimination or unfair practices because of race, creed, color, national origin, families with children, sex, marital status, sexual orientation, age, honorably discharged veteran or military status, or the presence of any sensory, mental, or physical disability or the use of a trained guide dog or service animal by a person with a disability.

Subgrantees must comply with the Federal Fair Housing Act and its amendments as it now reads or as

[13] CHG allows for 6 months of continued case management after a household is over income at re-certification. HEN funds may not be used to provide case management when a household is no longer HEN eligible. See Sections 3.7.1, 4.7.1, and 5.8.

it may be amended. The Fair Housing Act currently prohibits discrimination because of race, color, national origin, religion, sex, disability or family status. The Fair Housing Act prohibits enforcing a neutral rule or policy that has a disproportionately adverse effect on a protected class.

Local nondiscrimination laws may include additional protected classes.

Subgrantees serving households with children must serve all family compositions. If a program operates gender-segregated facilities, the program must allow the use of facilities consistent with the client's gender expression or identity.

All emergency shelter facilities must meet the Americans with Disabilities Act (ADA) standards to the maximum extent feasible.

## 7.7 Prohibitions

- ✓ Subgrantees may not require households to participate in a religious service as a condition of receiving program assistance.
- ✓ Subgrantees may not deny emergency shelter to households that are unable to pay fees for emergency shelter.
- ✓ If a program serves households with children, the age of a minor child cannot be used as a basis for denying any household's admission to the program.

## 7.8 Client File Check List

Lead/subgrantee must use the *CHG Client File Checklist* to record the contents of each client file. Programs may create their own checklist but the components of the *CHG Client File Checklist* must be included.

Drop-in shelters are not required to have a client file checklist.

## 7.9 Consent to Review Information in the Benefits Verification System

All household members must provide informed consent for lead/subgrantees to review confidential information in the Benefits Verification System (BVS) on the form *DSHS 14-012(x)(REV 02/2003).* See Appendix H: Access to the DSHS Benefits Verification System Data Security Requirements for more information. This form must be kept in the client file.

## 7.10 Complaint Procedure *(replaces formerly titled Grievance Procedure)*

Subgrantees must have a complaint procedure for:

- ✓ all households seeking or receiving services,
- ✓ employees and volunteers, and
- ✓ public upon request

The Complaint Procedure must include:

- ✓ Contact information for who is responsible for handling complaints
- ✓ A description of how to submit a complaint
  - The submission process must allow for submission of anonymous complaints. An anonymous complaint and/or a complaint submitted using an alias must be identified as such for records purposes.

- ✓ Timelines, including expected follow-up response times.
- ✓ A description of how complaints will be addressed at the lead/subgrantee level.

The complaint procedure must:

- ✓ Be in written form using plain talk language, including how to request translation services or other accommodation and assistance needed to complete the complaint.
- ✓ Be posted at facilities and on websites.
- ✓ Be available to the **public upon request.**
- ✓ Be accessible to all **households seeking or receiving services**.
  - Be communicated and provided to households, including within all materials, such as client handbooks and signatory paperwork, and discussed/verbalized during intake.
- ✓ Be provided to all **employees upon hiring.**
  - Must prohibit any form of retaliation via fines, fees, or other strictly enforced contractual terms.
- ✓ Explain how to escalate the complaint for external review if the issue has been unsatisfactorily resolved with the lead/subgrantee, or if the person is fearing retaliation, including:
  - How to escalate the complaint to the lead grantee, if applicable
  - How to escalate the complaint to Commerce, including submitting anonymously, via the Commerce CHG Program Manager or Commerce's Quality Assurance Manager.

The subgrantee's internal complaint procedure must be implemented first before escalating it to the external process of the lead grantee or Commerce, unless the person filing a complaint fears retaliation working with the internal complaint process.

Subgrantees are required to maintain a complaint log. The complaint log will indicate the complaint and actions taken to resolve the complaint. The complaint log may be reviewed during monitoring or upon request by Commerce.

The complaint procedure does not replace landlord-tenant law or established processes such as Medicaid fair hearings processes.

Note: Some federal funding sources also require that the U.S. Department of Housing and Urban Development (HUD) also be listed for complaint submission if all other avenues have been exhausted.

## 7.11 Program Exit and Denial of Service Policy (*formally titled Termination and Denial*)

Subgrantees must have a program exit and denial of service policy.

This policy must:

- ✓ Describe the reasons a household would be denied services and/or exited from program participation
- ✓ Describe the notification process
- ✓ Ensure households are made aware of the grievance procedure

## 7.12 Personal Identifying Information

Personal identifying information must never be sent electronically unless sent via a secure file transfer.

## 7.13 Fraud and Other Loss Reporting

Subgrantees must inform their CHG contracting entity in writing of all known or suspected fraud or other loss of any funds or other property furnished under this grant. Reasonable attempts must be made to prevent fraud and ineligible use of funds.

## 7.14 Records Maintenance and Destruction

Subgrantees must maintain records relating to this grant for a period of six years following the date of final payment.

Paper records derived from HMIS which contain personally identifying information must be destroyed within seven years after the last day the household received services from the subgrantee.

## 7.15 HMIS

Subgrantees providing direct service must enter client data into the Homeless Management Information System (HMIS) for all temporary and permanent housing interventions regardless of budget category in accordance with the most current HUD HMIS Data Standards.

Paper records derived from HMIS, which contain personally identifying information, must be destroyed within seven years after the last day the household received services from the lead/subgrantee.

### 7.15.1 HMIS Data Quality

Subgrantees are required to provide quality data to the best of their ability. Balance of State Continuum of Care (BoS CoC) agencies must enter HMIS data in accordance with requirements outlined in the HMIS Data Quality Plan.

Maintaining a high level of data quality is important for effective program evaluation. Data quality has four elements. Data quality requirements and targets for the elements listed below are identified in the HMIS Data Quality Plan.

- ✓ Timeliness
- ✓ Completeness
- ✓ Accuracy
- ✓ Consistency

### 7.15.2 Consent for Entry of Personally Identifying Information in HMIS

#### 7.15.2.1 Identified Records

- ✓ Personally identifying information (PII)[14] must not be entered into HMIS unless all adult household members have provided informed consent.
- ✓ Informed consent must be documented with a signed copy of the *Client Release of Information and Informed Consent Form* in the client file. If electronic consent has been received, a copy does not need to be printed for the client file but must be available in HMIS. If telephonic consent has been received, complete the consent form the first time the household is seen in person. See HMIS Agency Partner Agreement.

#### 7.15.2.2 Anonymous Records

The following types of records must be entered anonymously per Department of Commerce Guidance:

[14] PII includes name, social security number, birthdate, address, phone number, email, and photo.

- ✓ Households in which one adult member does not provide informed consent for themselves or their dependents
- ✓ Households entering a domestic violence program or currently fleeing or in danger from a domestic violence, dating violence, sexual assault, human trafficking or a stalking situation
- ✓ Minors under the age of 13 with no parent or guardian available to consent to the minor's information in HMIS
- ✓ Households in programs which are required by funders to report HIV/AIDS status

#### 7.15.2.3 Special Circumstances

If the reporting of the HIV/AIDS status of clients is not specifically required, the HIV/AIDS status must not be entered in HMIS.

If a combination of race, ethnicity, gender, or other demographic data could be identifying in your community, those data should not be entered for anonymous records.

### 7.15.3 HMIS Data Suppression Policy

Data suppression refers to various methods or restrictions that are applied to datasets, reports or visualizations in order to protect the identities, privacy and personal information of individuals. In Washington State, RCW 43.185C.180 and RCW 43.185C.030 specify that all personal information in the HMIS is confidential and that the identity and right of privacy of these individuals must be protected.

Personal Identifiable Information (PII) is a separate topic and must never be disclosed to any entity that does not have HMIS access or is not part of your data sharing agreement.

It is the policy of the HMIS program to suppress data when the data contains demographic detail, the numbers are small enough to potentially identify a person, and:

- ✓ Will be in a public space or presentation, or
- ✓ Will be shared with an entity that is not covered in the HMIS Consent Form.

In these cases, any non-zero counts that are under 11 will be suppressed.

Additional suppression will be needed when the suppressed value can be derived from other reported values. For example, when you can calculate the suppressed value by subtracting other values from the grand total.

The exceptions to data suppression are zero values or values that fall under an "unknown" category type. Both of these circumstances do not contribute any valuable information that could identify a person or reveal confidential data and thus, is not subject to suppression.

Learn more about how to apply data suppression and which data sharing entities are required to meet this policy in the HMIS Data Suppression Policy document.

## 8 Additional Requirements for Rent Assistance

For rapid re-housing, see also *Seattle and King County Rapid Re-Housing Program Standards* for additional requirements and information.

### 8.1 Washington Residential Landlord-Tenant Act

Subgrantees must provide information on the Washington Residential Landlord Tenant Act (RCW 59.18) to households receiving rent assistance or residing in Continuous Stay Shelters/Transitional Housing.

For more information on this law, visit Washington Law Help, housing page, tenant rights at www.washingtonlawhelp.com.

### 8.2 Rental Agreements

Client files must contain one of the following types of agreements if rent assistance is paid on their behalf: Intent to Rent, Lease, or Certification of Payment Obligation.

If the rent assistance paid is move-in costs (security deposits, first and last month's rent) only, an Intent to Rent form is allowable. If the rent assistance will exceed move-in costs to include on-going rent, a lease or Certification of Payment Obligation is required.

A Rental Subsidy Agreement, as described in this section, is a requirement for Rapid Re-Housing programs with ESG funding, and recommended as a best practice for all Rapid Re-Housing programs:

Rapid Re-Housing programs may make rental assistance payments only to an owner with whom the subgrantee has entered into a Rental Subsidy Agreement. The Rental Subsidy Agreement must set forth the terms under which rental assistance will be provided, including:

- Maximum length of subsidy period,
- Maximum amount or percentage of rental assistance that the household may receive,
- Maximum number of months that the household may receive rental assistance.
- Any requirements that the household share in the costs of the rent.

The Rental Subsidy Agreement must provide that, during the term of the agreement, the owner must give the subgrantee a copy of any notice to the household to vacate the housing unit, or any complaint used to commence an eviction action against the household.

The subgrantee must make timely payments to each owner in accordance with the Rental Subsidy Agreement. The Rental Subsidy Agreement must contain the same payment due date, grace period and late payment penalty requirements as the program participant's lease. The subgrantee is solely responsible for paying late payment penalties that it incurs with its own funds.

#### 8.2.1 Intent to Rent

At a minimum, an Intent to Rent form must contain the following:

- ✓ Name of tenant
- ✓ Name of landlord
- ✓ Address of rental property
- ✓ Rent rate

- ✓ Security Deposit and other required fees
- ✓ Signature of landlord/date

### 8.2.2 Lease

At a minimum, the lease or rental agreement between the lead/subgrantee and the landlord OR the household and the landlord must contain the following:

- ✓ Name of tenant
- ✓ Name of landlord
- ✓ Address of rental property
- ✓ Occupancy details (who gets to live at the rental)
- ✓ Term of agreement (lease start and end dates)
- ✓ Rent rate and date due
- ✓ Deposits (if any, type, amount, terms)
- ✓ Signature of tenant and date
- ✓ Signature of landlord and date

### 8.2.3 Certification of Payment Obligation

A *CHG Certification of Payment Obligation* is required for rent subsidies paid to a friend or family member who is not in the business of property management. This form must be kept in the client file.

The CHG Certification of Payment Obligation form cannot be used in lieu of a lease for programs with federal funding.

## 8.3 Determining Rent Subsidy

Subgrantees must have a standardized procedure for determining the amount of rent subsidy for each household receiving rent assistance, this includes Transitional Housing. At minimum, the *CHG Rent Subsidy Calculation Tool* or another tool approved by Commerce must be used to document the determination process.

Rapid re-housing programs must use the standardized procedure identified in the *Seattle and King County Rapid Re-Housing Program Standards*.

The procedure must align with progressive engagement[15], where services are client-driven, and each household's unique circumstances are considered. In the rent subsidy determination process, this must include a consideration of each household's resources/income, expenses, and barriers to housing stability. Although the procedure for determining the subsidy must be standardized, each household may receive a different amount of rent subsidy.

This means the assessment questions used to determine the rent subsidy must be the same for all households, but each household's contribution will be different depending on the household's resources and expenses. Grantees must use household net income (after taxes, deductions, and garnishments) when determining rent subsidy.

The rent subsidy should be adjusted when there is a change in household circumstance, income, or need. At minimum, rent subsidies should be reviewed during 90-day income recertification and

[15] See Section 7.4 for definition of progressive engagement. Note: A policy requiring all households to pay 30% of their income, or any other calculation that requires a standard contribution for each household, is **not** in compliance with grant terms.

alongside housing stability planning.

Households receiving TANF or GA/ABD benefits must not be obligated to contribute their cash benefits towards rent. An exception can be made if the rent amount exceeds the maximum limits established by the grantees rent limit policy.

If subgrantees utilize other contracted funding alongside CHG which requires a different rent subsidy determination process, King County will notify Commerce to discuss compliance with this section; exceptions may be made as appropriate.

## 8.4 Payment Standards to Determine Rent Limit

Subgrantees must choose either the HUD Fair Market Rent (Section 8.4.1) ***or*** the Rent Reasonableness (8.4.2) payment standard to be used for all units receiving a rent subsidy, including arrears, and must be completed before the rent subsidy is paid.

Subgrantees must document their selected payment standard.

For rapid re-housing, see *Seattle and King County Rapid Re-Housing Program Standards* for requirements and information regarding rent limits.

### 8.4.1 HUD's Fair Market Rent

Fair Market Rent (FMR) sets rent limits on the subsidy provided to the household. FMR is established by HUD (https://www.huduser.gov/portal/datasets/fmr.html ) and is updated each federal fiscal year (October 1). For this grant, rent calculations do not need to include the cost of utilities.

If a hotel/motel room is being used as permanent housing, compare it to a studio/efficiency unless the room is a suite with separate bedrooms.

If mobile home lot fees are used to place a personal mobile home, compare it to the equivalent size unit. For example, RVs use studio/efficiency, two bedroom mobile home use two bedroom unit, three bedroom mobile home use three bedroom unit, etc.

FMR must be documented in client files and show that the unit rent is within the FMR limit set by the program rent limit policy.

### 8.4.2 Rent Reasonableness

Rent reasonableness means the total rent charged for a unit (or mobile home lot space) must be reasonable in relation to the rents being charged during the same time period for comparable units (or mobile home lot space) in the private unassisted market and must not be in excess of rents being charged by the owner during the same time period for comparable non-luxury unassisted units.

To make this determination, the grantee should consider (a) the location, quality, size, type, and age of the unit; and (b) any amenities, housing services, maintenance and utilities to be provided by the owner. Comparable rents can be checked by using a market study, by reviewing comparable units advertised for rent, or with a note from the property owner verifying the comparability of charged rents to other units owned (for example, the landlord would document the rents paid in other units).

For more information, see HUD's guide at https://files.hudexchange.info/resources/documents/CoC-Rent-Reasonableness-and-FMR.pdf.

The rental assistance paid cannot exceed the actual rental cost.

Documentation of rent reasonableness must be kept in the client file. HUD's Rent Reasonableness Form or comparable form must be used, see HUD's worksheet on rent reasonableness at RENT REASONABLENESS CHECKLIST AND CERTIFICATION

### 8.4.3 Rent Limit Exceptions

If a subgrantee uses FMR as the payment standard, exceptions to rent limits must be documented in the client file together with "rent reasonableness" comparison of three comparable units in that zip code.

If a subgrantee uses rent reasonableness as the payment standard, exceptions to rent limits must be documented in the client file together with the applicable FMR.

## 8.5 Landlord Verification

To help prevent fraud, subgrantees must verify that any new or previously unknown landlord or property management company is legitimately associated with the rental property before issuing a rent payment. This requirement does not apply when households are living with friends or family or in a hotel/motel unit.

Subgrantees must establish written policies and procedures describing how landlord verification is conducted. Acceptable methods of verification may include, but are not limited to:

- ✓ Reviewing property ownership records through the county assessor's office.
- ✓ Confirming that the signed lease/rental agreement includes the landlord or property management company's name and contact information, along with the rental property address.
- ✓ If a property management company is involved, requesting documentation (such as a management agreement) showing the company is authorized to manage the property.
- ✓ Verifying the property management company is registered to do business in the state and is associated with the property.
- ✓ When other verification methods are not available, obtaining a signed attestation from the landlord or property manager affirming they are legally authorized to rent the property and receive payments.

See Appendix J: Landlord Verification

Documentation must be retained in the client file.

## 8.6 Portability

Subgrantees cannot terminate assistance if a household chooses to relocate to a jurisdiction outside the grantee's service area. Subgrantees should work with the household to maintain meaningful case management (e.g. phone, home visits, video calls) and continue rental assistance, if applicable, until the household is no longer eligible or declines participation

## 8.7 Dispute Resolution Center Partnerships

Subgrantees should work with their local Dispute Resolution Centers (DRC) . DRCs can be an essential pathway to collaborate and negotiate for mutual gain to prevent evictions and maintain positive landlord relationships.

There are many ways to partner with a DRC. The following list is not comprehensive and grantees should work towards a partnership that makes sense for their community.

- ✓ Embed a release of information in your intake process to be able to communicate with DRC staff.
- ✓ Train DRC staff on Eviction Prevention program eligibility.
- ✓ Receive Eviction Prevention referrals from the DRC.
- ✓ Engage with DRC staff to help resolve communication challenges between landlords and households.
- ✓ Invite DRC staff to participate in rent assistance provider meetings.
- ✓ Partner households with DRC staff to help establish repayment plans when appropriate.

DRCs in King County:

- ✓ Dispute Resolution Center of King County
- ✓ Tenant Law Center

## 8.8 Washington State's Landlord Mitigation Law

Subgrantees providing direct service should refer landlords to the Landlord Mitigation Program when appropriate. Washington State's Landlord Mitigation Law (RCW 43.31.605) provides landlords with an incentive and added security to work with tenants receiving rental assistance. The program offers up to $1,000 to the landlord in reimbursement for some potentially required move-in upgrades, up to fourteen days' rent loss and up to $5,000 in qualifying damages caused by a tenant during tenancy.

A move in/move out condition report is required for a landlord to receive reimbursement.

For more information, please visit the Commerce Landlord Mitigation Program website.

# 9 Habitability Requirements for all Rent Assistance and Facility-Based Projects

## 9.1 Inspections and Landlord Certification

### 9.1.1 For Rent Assistance

Documented habitability is required for all housing units into which households will be moving, except when a household moves in with friends or family or into a hotel/motel unit. Housing units must be documented as habitable prior to paying the rent subsidy. Documentation must be kept in the client file.

Habitability can be documented by the *Landlord Habitability Standards Certification Form* or inspection. Both methods are valid for the length of time the household is a tenant in the housing unit. If the housing unit is provided to a different household within 12 months of documented habitability, an additional certification/inspection is not required.

#### 9.1.1.1 Allowable Methods for Unit Habitability Determination

The *CHG Landlord Habitability Standards Certification Form* references the state Landlord Tenant Act (RCW 59.18.060) and requires the landlord (as defined in RCW 59.18.030) to certify that the unit meets the safety and habitability standards detailed in the law. The landlord's failure to comply with the law may result in termination of the rent subsidy.

OR

Inspections: in lieu of (or in addition to) the above landlord certification, subgrantees may choose to inspect all housing units. Programs may use the *Commerce Housing Habitability Standards (HHS) Form* or the *HUD Housing Quality Standards (HQS) Inspection Form*.

Documentation of habitability certification or inspection must be kept in the client file.

#### 9.1.1.2 Habitability Complaint Procedure

Each household must be informed in writing of the habitability complaint process and assured that complaints regarding their housing unit's safety and habitability will not affect the household's eligibility for assistance.

Subgrantee must have a written procedure describing the response to complaints regarding unit safety and habitability. The procedure must include:

- ✓ Mandatory inspection when a complaint is reported using the HHS Form, HQS Inspection Form, or documenting the specific complaint in an alternate format that includes follow-up and resolution.

### 9.1.2 For Facilities

All facilities must conduct and document an inspection at least once a year using the HHS Form or HQS Inspection Form.

Documenting habitability is not required if a hotel/motel is used for emergency shelter.

## 9.2 Lead Based Paint Assessment

To prevent lead poisoning in young children, lead/subgrantees must comply with the Lead-Based Paint Poisoning Prevention Act of 1973 and its applicable regulations found at 24 CFR 35, Parts A, B, M, and R.

A visual assessment must be conducted on an annual basis thereafter (as long as assistance is provided.) Visual assessments must be conducted by a HUD-Certified Visual Assessor and must be documented on the HQS Inspection Form or HHS Form and maintained in the client file.

For a guide to compliance see Appendix G: Lead-Based Paint Visual Assessment Requirements**.**

### 9.2.1 For Rent Assistance

A lead-based paint visual assessment must be completed prior to providing rapid re-housing or homelessness prevention rent assistance if a child under the age of six or pregnant woman resides in a unit constructed prior to 1978.

### 9.2.2 For Facilities

All facilities that may serve a child under the age of six or a pregnant woman constructed prior to 1978 must conduct an annual lead-based paint visual assessment which is documented on the HQS Inspection Form or HHS Form, and readily accessible for review.

A lead-based paint visual assessment is not required if the facility is a hotel/motel used for emergency shelter.

### 9.2.3 Exceptions to the Lead-Based Paint Visual Assessment Requirement

Visual assessments are not required under the following circumstances:

- ✓ Zero-bedroom or SRO-sized units;
- ✓ X-ray or laboratory testing of all painted surfaces by certified personnel has been conducted in accordance with HUD regulations and the unit is officially certified to not contain lead-based paint;
- ✓ The property has had all lead-based paint identified and removed in accordance with HUD regulations;
- ✓ The unit has already undergone a visual assessment within the past 12 months –obtained documentation that a visual assessment has been conducted; or
- ✓ It meets any of the other exemptions described in 24 CFR Part 35.115(a).

If any of the circumstances outlined above are met, lead/subgrantees must include the information in the client file.

# 10 Appendices

## 10.1 Appendix A: Required Forms

The following forms are provided and required CHG forms, if applicable. All forms are posted on your CHG contracting entity's website.

For a full list of all required client file documentation, see Appendix C: Client File Documentation.

- ✓ Consolidated Homeless Grant Verification of Household Eligibility and Income Recertification (Sections 3.4;3.6;3.7;3.8.1;4.4;4.6;4.7;5.4;5.5.1;5.6)
- ✓ Consolidated Homeless Grant Income Eligibility Worksheet (Section 3.6 and 4.6)
- ✓ Consolidated Homeless Grant Utility-Only Assistance Form (Section 6.1)
- ✓ Client Release of Information and Informed Consent Form (Section 7.15.2.1)
- ✓ Consolidated Homeless Grant Rent Subsidy Calculation Tool (Section 8.3) or other tool approved by Commerce
- ✓ Consolidated Homeless Grant Landlord Habitability Standards Certification Form OR Commerce Housing Habitability Standards (HHS) Form OR HUD Housing Quality Standards (HQS) Inspection Form– including Lead-based Paint Visual Assessment (Section 9.1)
- ✓ Consolidated Homeless Grant Client File Checklist (Section 7.8)
- ✓ DSHS 14-012(x)(REV 02/2003) for BVS (Section 7.9)
- ✓ Consolidated Homeless Grant Certification of Payment Obligation (Section 4.8 and 8.2.3)
- ✓ Consolidated Homeless Grant Targeted Prevention Eligibility Screening Form (Section 4.4.1 and 5.4.1) or other tool approved by Commerce
- ✓ Rent Reasonableness Form (Section 8.4.2)
- ✓ HMIS Client Release of Information and Informed Consent Form (Section 7.15)

## 10.2 Appendix B: Required Policies and Procedures

- ✓ Coordinated Entry Policies (Section 2.1.3)
- ✓ Temporary Absence Policies and Procedure, if applicable (Section 6.1.1)
- ✓ Flexible Funding Gift Card Procedure (Section 6.3.3.3)
- ✓ Complaint Procedure (Section 2.2.6;7.10)
- ✓ Program Exit and Denial of Service Policy (Section 7.11)
- ✓ Determining Rent Subsidy Procedure (Section 8.3)
- ✓ Rent Limit Policy or Rent Reasonableness Policies and Procedures (Section 8.4)
- ✓ Landlord Verification Policies and Procedures (Section 8.5)
- ✓ Habitability Complaint Procedure (Section 9.1.1.2)

Projects providing landlord incentives and reimbursements for damages must have:

- ✓ Landlord Incentive Policy and Procedures (explaining what constitutes landlord incentives, how they are determined, and who has approval and review responsibilities).

Projects providing services only (e.g. street outreach, case management only) must have:

- ✓ Complaint Procedure (Section 2.2.6;7.10)
- ✓ Program Exit and Denial of Service Policy, as applicable (Section 7.11)

  For example, a street outreach project should have a policy that describes the reasons a household would be denied services, but it likely will not be relevant to have a notification process or to provide each household encountered with information about a complaint procedure.

## 10.3 Appendix C: Client File Documentation

The following chart summarizes the documentation required in each client file, depending on the type of service provided. Other documentation may be required based on individual circumstances. Forms indicated as "CHG" are specifically provided by King County and subgrantees are required to use those forms as listed below.

| Documentation | Drop-in Shelter | Continuous Stay Shelter | Transitional Housing | Rapid Re-housing Rent Assistance | Permanent Supportive Housing | Homelessness Prevention Rent Assistance | Flex Funding Only | When | Notes |
|---|---|---|---|---|---|---|---|---|---|
| **Client File Checklist** | | ✓ | ✓ | ✓ | ✓ | ✓ | | Intake | Each program must develop their own checklist with all required elements as listed on this form. |
| **HMIS Client Release of Information and Informed Consent Form** | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ | | Intake | Required if HMIS record contains personally identifying information. Not required for DV programs |
| **DSHS 14-012(x)(REV 02/2003) for BVS, if applicable** | | ✓ | ✓ | ✓ | ✓ | ✓ | | Intake (if applicable) | Required for any BVS/eJAS search to confirm HEN eligibility, document income or as otherwise needed and appropriate. |
| **CHG Verification of HH Eligibility and Income Recertification Form (with associated documentation)** | | if staying longer than 90 days | ✓ income is exempt for the first 90 days | ✓ income is exempt for the first 90 days | ✓ | ✓ | ✓ housing status | Intake and every subsequent 90 days for income | Including backup documentation as indicated in the form |
| **CHG Income Eligibility Worksheet, if applicable** | | if staying longer than 90 days | ✓ income is exempt for the first 90 days | ✓ income is exempt for the first 90 days | ✓ | ✓ | | every subsequent 90 days | Obtain current backup documentation and confirm within AMI limit. |
| **Targeted Prevention Eligibility Screening Form** | | | | | | ✓ | | Intake (if applicable) | HEN Homelessness Prevention or Homelessness Prevention required document |
| **FMR documentation OR Rent Reasonableness Form** | | | | ✓ | ✓ | ✓ | | When moving into a new unit | |
| **Landlord Habitability Certification OR HHS or HQS** | | | ✓ | ✓ | ✓ | ✓ if moving into a new unit | | When moving into a new unit (or annually for facilities) | Inspection not required if moving in with family or friends **(and no federal funds).** |
| **Lead-based Paint Assessment, if applicable** | | | ✓ | ✓ | ✓ | ✓ | | When moving into a new unit (or annually for facilities) | Refer to guidelines re Lead Based Paint requirements. |

| | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|
| **Utility-Only Assistance Form, if applicable** | | | | | | ✓ | | Intake | Homelessness Prevention only |
| **Lease OR Certification of Payment Obligation** | | | ✓ | ✓ | ✓ | ✓ | | At Move-in or beginning of rent subsidy | Lease required if rent assistance is paid to a landlord (or if there are federal funds in your contract) |
| **Intent to Rent, if applicable** | | | | ✓ | | ✓ | | At Move-in or beginning of rent subsidy | |
| **Household Rent subsidy amount / Rent determination process** | | | ✓ | ✓ | ✓ | ✓ | | At Move-in or beginning of rent subsidy | |
| **Assessment and Housing Stability Planning** | | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ housing stability plan | Intake and ongoing | |
| **Temporary Absence, if applicable** | | | | ✓ | ✓ | ✓ | | | |
| **Rental Subsidy Agreement (recommended)** | | | | ✓ | | | | Beginning of rent subsidy | An agreement between the subgrantee and landlord |
| **Proof of ownership** | | | | ✓ | ✓ | ✓ | | Beginning of rent subsidy | If rent assistance is being paid to a landlord; print-out from County parcel website |

## 10.4 Appendix D: Homeless System Performance Requirements

### 10.4.1 Housing Outcome Performance Requirements

In accordance with RCW 43.185C.185, project programming must promote equitable outcomes. Performance monitoring must include an evaluation of outcomes disaggregated by race and ethnicity to identify any potential disparities[16]. The housing outcomes of exited households across racial and ethnic demographics should not be significantly less than the overall rate[17].

### 10.4.2 CoC System Wide Targets and Minimum Standards

The Seattle/King County Continuum of Care system-wide performance targets specific to intervention type are outlined in Table A. Exceeding designated minimums in Table B and demonstrating progress towards performance measures identified in Table A is a requirement.

Projects must also evaluate outcomes disaggregated by race and ethnicity by intervention to identify any potential disparities. Housing outcomes of exited households across demographics should not be significantly less than the overall rate.

**Table A**

| Intervention | Core Outcomes | | | Entries from Homelessness | Utilization Rate |
|---|---|---|---|---|---|
| | Exit Rate to PH | Length of Stay (days) | Return Rate to Homelessness | | |
| Emergency Shelter (Drop-in/Continuous) | 50% (S and YYA)<br>80% (F) | 30 (S and F)<br>20 (YYA) | 8% (S and F)<br>5% (YYA) | 90% | 95% |
| Transitional Housing | 85% | 90 (S and F)<br>180 (YYA) | 8% (S and F)<br>5% (YYA) | 95% | 95% |
| Rapid Re-Housing | 85% | Differs by intervention and/or population | 3% (S and F)<br>5% (YYA) | 95% | NA |
| PSH | 90% | NA | 3% (S and F)<br>5% (YYA) | 95% | 95% |

**Table B**

| Intervention | Core Outcomes | Entries from Homelessness | Utilization Rate | | | |
|---|---|---|---|---|---|---|
| | Exit Rate to PH | | Length of Stay (days) | Return Rate to Homelessness | | |
| Emergency Shelter (Drop- | 40% (S)<br>65% (F) | | 90 (S and F)<br>30 (YYA) | 10% (S and F)<br>20 (YYA) | 90% | 85% (S and F) |

[16] In the case of an evaluation of equitable outcomes, disparities are defined as instances in which the outcome rate of a particular racial or ethnic category is significantly less than the overall rate.

[17] The "overall rate" refers to the rate of a particular intervention type's total exits to positive outcomes. This is inclusive of all ethnic or racial categories

| | | | | | |
|---|---|---|---|---|---|
| n/Continuous) | 35% (YYA) | | | | 90% (YYA) |
| Transitional Housing | 85% | 150 (S and F)<br>180 (YYA) | 10% (S and F)<br>20% (YYA) | 90% | 85% |
| Rapid Re-Housing | 85% | Differs by intervention and/or population | 5% (S and F)<br>20% (YYA) | 90% | NA |
| PSH | 90% | NA | 3% (S and F)<br>5% (YYA) | 95% | 95% |

### 10.4.3 Compliance Methodology

The Homeless Management Information System (HMIS) is the data source for calculating the baseline performance and progress towards performance targets.

### 10.4.4 Performance Monitoring

Commerce will monitor grantee performance management activities.

### 10.4.5 Equitable Access

RCW 43.185C.185, passed by the Washington State Legislature in April 2021, requires that Commerce promote racial equity within homeless service system program access to ensure that the race and ethnicity of households served are proportional to the numbers of people in need of services in each county.

### 10.4.6 Subgrantee Agreements

CHG subgrantee agreements must include performance requirements.

## 10.5 Appendix E: Household Eligibility Requirements

A household is one or more individuals seeking to obtain or maintain housing together. The entire household is considered for eligibility determination and services. A household does not include friends or family that are providing temporary housing.

Eligible households must meet both housing status and income requirements as detailed in the following table.

| ELIGIBILTY REQUIREMENTS | | | | |
|---|---|---|---|---|
| **Intervention** | **Time Limit** | **HOUSING STATUS** | **INCOME AT ENROLLMENT** | **INCOME AT RECERTIFICATION** |
| **Flex Funding** | No requirement | Homeless<br>OR<br>Chronically homeless<br>OR<br>At risk of homelessness | At or below 80% AMI<br>OR<br>HEN Referral<br>OR<br>None if not receiving ongoing rent assistance | None |

| | | | | |
|---|---|---|---|---|
| **Drop-in Shelter** | No requirement | None | None | None |
| **Continuous-stay Shelter** | No requirement | None | None | At or below 80% AMI |
| **Transitional Housing** | Up to 24 months | Homeless | At or below 50% AMI | At or below 80% AMI |
| **Rapid Re-Housing** | Up to 24 months | Homeless | At or below 50% AMI | At or below 80% AMI |
| **Homelessness Prevention** | Up to 90 days for most households | At risk of homelessness | At or below 50% AMI | At or below 80% AMI |
| **HEN Rapid Re-Housing** | No time limit | Homeless | DSHS HEN Referral | DSHS HEN Referral OR Lost HEN Referral due to receiving federal supplemental security income, social security disability income, or social security retirement income and still has an immediate housing need |
| **HEN Homelessness Prevention** | No time limit | At risk of homelessness | DSHS HEN Referral | DSHS HEN Referral OR Lost HEN Referral due to receiving federal supplemental security income, social security disability income, or social security retirement income and still has an immediate housing need |
| **Permanent Supportive Housing (PSH)** | No time limit | Homeless and a household member with a permanent disability | At or below 50% AMI | None |
| **Permanent Supportive Housing for Chronically** | No time limit | Chronically homeless head of household with a permanent disability | At or below 50% AMI | None |

| | | | | |
|---|---|---|---|---|
| **Homeless Families (PSH CHF)** | | | | |

## 10.6 Appendix F: Examples of Maintenance Activities

| ALLOWABLE EXPENSES | | |
|---|---|---|
| **Cleaning Activities** | **Protective or Preventative Measures to Keep a Building, its Systems, and its Grounds in Working Order** | **Replacing Existing Appliances or Objects That Have Broken or are Clearly Past Their Useful Life, are not Fixtures or Part of the Building (See above for definition of "fixtures.")** |
| • Cleaning gutters and downspouts<br>• Lawn and yard care (mowing, raking, weeding, trimming/pruning trees and shrubs)<br>• Cleaning a portion of interior or exterior of building, including graffiti removal<br>• Washing windows<br>• Litter pick-up and trash collection<br>• Removing snow/ice<br>• Unclogging sinks and toilets | • Fixing gutters<br>• Mending cracked plaster<br>• Patching roof<br>• Caulking, weather stripping, re-glazing.<br>• Replacing a broken window or screen<br>• Reapplication of protective coatings<br>• Fixing plumbing leaks<br>• Repainting previously painted surface (including limited scraping)*<br>• Waterproofing (sealant)<br>• Servicing and maintenance of mechanical systems<br>• Replacing a carpet square or patching carpet<br>• Fixing alarm systems<br>• Installing temporary fencing | Replacing:<br>• Kitchen appliances where removal would not cause any damage (for example dishwashers, stoves, refrigerators)<br>• Light bulbs<br>• Washing and drying machines<br>• Air filters<br>• Furniture |
| * Non-destructive methods only (e.g., no sandblasting or high pressure spraying). | | |

## 10.7 Appendix G: Lead-Based Paint Visual Assessment Requirements

To prevent lead-poisoning in young children, Subgrantees must comply with the Lead-Based Paint Poisoning Prevention Act of 1973 and its applicable regulations found at 24 CFR 35, Parts A, B, M, and R.

**Disclosure Requirements**

For ALL properties constructed prior to 1978, landlords must provide tenants with:

- ✓ Disclosure form for rental properties disclosing the presence of known and unknown lead-based paint;
- ✓ A copy of the "Protect Your Family from Lead in the Home" pamphlet.

Both the disclosure form and pamphlet are available at: https://www.epa.gov/lead/real-estate-disclosure

It is recommended that rent assistance providers also share this information with their clients.

**Determining the Age of the Unit**

Subgrantees should use formal public records, such as tax assessment records, to establish the age of a unit. These records are typically maintained by the state or county and will include the year built or age of the property. To find online, search for your county name with one of the following phrases:

- ✓ "property tax records"
- ✓ "property tax database"
- ✓ "real property sales"

Print the screenshot for the case file. If not available online, the information is public and can be requested from the local authorities.

**Conducting a Visual Assessment**

Visual assessments are required when:

- ✓ The leased property was constructed before 1978;

*AND*

- ✓ A child under the age of six or a pregnant woman will be living in the unit occupied by the household receiving rent assistance.

A visual assessment must be conducted prior to providing rent assistance to the unit and on an annual basis thereafter (as long as assistance is provided). Lead/Subgrantees may choose to have their program staff complete the visual assessments or they may procure services from a contractor. Visual assessments must be conducted by a HUD-Certified Visual Assessor.

Anyone may become a HUD-Certified Visual Assessor by successfully completing a 20-minute online training on HUD's website at:
http://www.hud.gov/offices/lead/training/visualassessment/h00101.htm

If a visual assessment reveals problems with paint surfaces, Lead/Subgrantees cannot approve the unit for assistance until the deteriorating paint has been repaired. Lead/Subgrantees may

wait until the repairs are completed or work with the household to locate a different (lead-safe) unit.

**Locating a Certified Lead Professional and Further Training**

To locate a certified lead professional in your area:

- ✓ Call your state government (health department, lead poison prevention program, or housing authority).
- ✓ Call the National Lead Information Center at 1-800-424-LEAD (5323).
- ✓ Go to the US Environmental Protection Agency website at https://www.epa.gov/leadand click on "Find a Lead-Safe Certified Firm."
- ✓ Go to Washington State Department of Commerce Lead-Based Paint Program website at http://www.commerce.wa.gov/building-infrastructure/housing/lead-based-paint/lead-based-paint-program-lbpabatement/ and click on “Find a Certified LBP Firm” under Other Resources.

Information on lead-based programs in Washington State can be found at http://www.commerce.wa.gov/building-infrastructure/housing/lead-based-paint/.

For more information on the Federal training and certification program for lead professionals, contact the National Lead Information Center (NLIC) at https://www.epa.gov/lead/forms/lead-hotline-national-lead-information-centeror 1-800-424-LEAD to speak with an information specialist.

The Lead Safe Housing Rule as well as a HUD training module can be accessed at https://www.hudexchange.info/programs/lead-based-paint/lshr-toolkit/introduction/

## 10.8 Appendix H: Access to the DSHS Benefits Verification System Data Security Requirements

1. **Definitions.** The words and phrases listed below, as used in this Appendix, shall each have the following definitions:

a. "Authorized User(s)" means an individual or individuals with an authorized business requirement to access DSHS Confidential Information.

b. "Hardened Password" means a string of at least eight characters containing at least one alphabetic character, at least one number and at least one special character such as an asterisk, ampersand or exclamation point.

c. "Unique User ID" means a string of characters that identifies a specific user and which, in conjunction with a password, passphrase or other mechanism, authenticates a user to an information system.

d. "Contractor" means CHG Lead/subgrantees.

2. **Data Transport**. When transporting DSHS Confidential Information electronically, including via email, the Data will be protected by:

a. Transporting the Data within the (State Governmental Network) SGN or Contractor's internal network, or;

b. Encrypting any Data that will be in transit outside the SGN or Contractor's internal network. This includes transit over the public Internet.

3. **Protection of Data**. The Contractor agrees to store Data on one or more of the following media and protect the Data as described:

a. **Hard disk drives**. Data stored on local workstation hard disks. Access to the Data will be restricted to Authorized User(s) by requiring logon to the local workstation using a Unique User ID and Hardened Password or other authentication mechanisms which provide equal or greater security, such as biometrics or smart cards.

b. **Network server disks**. Data stored on hard disks mounted on network servers and made available through shared folders. Access to the Data will be restricted to Authorized Users through the use of access control lists which will grant access only after the Authorized User has authenticated to the network using a Unique User ID and Hardened Password or other authentication mechanisms which provide equal or greater security, such as biometrics or smart cards. Data on disks mounted to such servers must be located in an area which is accessible only to authorized personnel, with access controlled through use of a key, card key, combination lock, or comparable mechanism.
   For DSHS Confidential Information stored on these disks, deleting unneeded Data is sufficient as long as the disks remain in a Secured Area and otherwise meet the requirements listed in the above paragraph. Destruction of the Data as outlined in Section 5. Data Disposition may be deferred until the disks are retired, replaced, or otherwise taken out of the Secured Area.

c. **Optical discs (CDs or DVDs) in local workstation optical disc drives**. Data provided by DSHS on optical discs which will be used in local workstation optical disc drives and which will not be transported out of a Secured Area. When not in use for the contracted purpose, such discs must be locked in a drawer, cabinet or other container to which only Authorized Users have the key, combination or mechanism required to access the contents of the container. Workstations which access DSHS Data on optical discs must be located in an area which is accessible only to authorized personnel, with access controlled through use of a key, card key, combination lock, or comparable mechanism.

d. **Optical discs (CDs or DVDs) in drives or jukeboxes attached to servers**. Data provided by DSHS on optical discs which will be attached to network servers, and which will not be transported out of a Secured Area. Access to Data on these discs will be restricted to Authorized Users through the use of access control lists which will grant access only after the Authorized User has authenticated to the network using a Unique User ID and Hardened Password or other authentication mechanisms which provide equal or greater security, such as biometrics or smart cards. Data on discs attached to such servers must be located in an area which is accessible only to authorized personnel, with access controlled through use of a key, card key, combination lock, or comparable mechanism.

e. **Paper documents**. Any paper records must be protected by storing the records in a Secured Area which is only accessible to authorized personnel. When not in use, such records must be stored in a locked container, such as a file cabinet, locking drawer, or safe, to which only authorized persons have access.

f. **Remote Access**. Access to and use of the Data over the State Governmental Network (SGN) or Secure Access Washington (SAW) will be controlled by DSHS staff who will issue authentication credentials (e.g. a Unique User ID and Hardened Password) to Authorized Users on Contractor staff. Contractor will notify DSHS staff immediately whenever an Authorized User in possession of such credentials is terminated or otherwise leaves the employ of the Contractor, and whenever an Authorized User's duties change such that the Authorized User no longer requires access to perform work for this Contract

g. **Data storage on portable devices or media**.

(1) Except where otherwise specified herein, DSHS Data shall not be stored by the Contractor on portable devices or media unless specifically authorized within the terms and conditions of the Contract. If so authorized, the Data shall be given the following protections:

(a)Encrypt the Data with a key length of at least 128 bits

(b)Control access to devices with a Unique User ID and Hardened Password or stronger authentication method such as a physical token or biometrics.

(c)Manually lock devices whenever they are left unattended and set devices to lock automatically after a period of inactivity, if this feature is available. Maximum period of inactivity is 20 minutes.

Physically Secure the portable device(s) and/or media by

(d)Keeping them in locked storage when not in use

(e)Using check-in/check-out procedures when they are shared, and

(f)Taking frequent inventories

(2) When being transported outside of a Secured Area, portable devices and media with DSHS Confidential Information must be under the physical control of Contractor staff with authorization to access the Data.

(3) Portable devices include, but are not limited to; smart phones, tablets, flash memory devices (e.g. USB flash drives, personal media players), portable hard disks, and laptop/notebook/netbook computers if those computers may be transported outside of a Secured Area.

(4) Portable media includes but is not limited to; optical media (e.g. CDs, DVDs), magnetic media (e.g. floppy disks, tape), or flash media (e.g. CompactFlash, SD, MMC).

h. **Data stored for backup purposes**.

(1) DSHS data may be stored on portable media as part of a Contractor's existing, documented backup process for business continuity or disaster recovery purposes.

Such storage is authorized until such time as that media would be reused during the course of normal backup operations. If backup media is retired while DSHS Confidential Information still exists upon it, such media will be destroyed at that time in accordance with the disposition requirements in Section 5. Data Disposition

(2) DSHS Data may be stored on non-portable media (e.g. Storage Area Network drives, virtual media, etc.) as part of a Contractor's existing, documented backup process for business continuity or disaster recovery purposes. If so, such media will be protected as otherwise described in this exhibit. If this media is retired while DSHS Confidential Information still exists upon it, the data will be destroyed at that time in accordance with the disposition requirements in Section 5. Data Disposition.

**4. Data Segregation.**

a. DSHS Data must be segregated or otherwise distinguishable from non-DSHS data. This is to ensure that when no longer needed by the Contractor, all DSHS Data can be identified for return or destruction. It also aids in determining whether DSHS Data has or may have been compromised in the event of a security breach. As such, one or more of the following methods will be used for data segregation.
b. DSHS Data will be kept on media (e.g. hard disk, optical disc, tape, etc.) which will not contain non-DSHS data. And/or,
c. DSHS Data will be stored in a logical container on electronic media, such as a partition or folder dedicated to DSHS Data. And/or,
d. DSHS Data will be stored in a database which will contain no non-DSHS data. And/or,
e. DSHS Data will be stored within a database and will be distinguishable from non-DSHS data by the value of a specific field or fields within database records.
f. When stored as physical paper documents, DSHS Data will be physically segregated from non-DSHS data in a drawer, folder, or other container.
g. When it is not feasible or practical to segregate DSHS Data from non-DSHS data, then both the DSHS Data and the non-DSHS data with which it is commingled must be protected as described in this exhibit.

**5. Data Disposition**. When the contracted work has been completed or when no longer needed, except as noted in Section 3. Protection of Data b. Network Server Disks above, Data shall be returned to DSHS or destroyed. Media on which Data may be stored and associated acceptable methods of destruction are as follows:

| Data Stored On: | Will be Destroyed By: |
|---|---|
| Server or workstation hard disks, or<br><br>Removable media (e.g. floppies, USB flash drives, portable hard disks) excluding optical discs | Using a "wipe" utility which will overwrite the Data at least three (3) times using either random or single character data, or<br><br>Degaussing sufficiently to ensure that the Data cannot be reconstructed, or<br><br>Physically destroying the disk |
| Paper documents with sensitive or Confidential Information | Recycling through a contracted firm provided the contract with the recycler assures that the confidentiality of Data will be protected. |
| Paper documents containing Confidential Information requiring special handling (e.g. protected health information) | On-site shredding, pulping, or incineration |
| Optical discs (e.g. CDs or DVDs) | Incineration, shredding, or completely defacing the readable surface with a coarse abrasive |
| Magnetic tape | Degaussing, incinerating or crosscut shredding |

6. **Notification of Compromise or Potential Compromise**. The compromise or potential compromise of DSHS shared Data must be reported to the subgrantee's CHG contracting entity within one (1) business day of discovery.

## 10.9 Appendix I: Access to the DSHS HEN Referral List Data Security Requirements

As required under RCW 43.185.C 230 and RCW 74.62.030, the Lead/sub grantee may use the ***HEN Referral List*** information for the sole purpose of improving access to HEN assistance for individuals determined eligible for a referral to HEN.

Access to Data shall be limited to staff whose duties specifically require access to such Data in the performance of their assigned duties.

Prior to making Data available to its staff, the Data Recipient shall notify all such staff of the Use and Disclosure requirements.

All staff accessing the data must sign a *DSHS Nondisclosure of Confidential Information – Non Employee* form prior to accessing the Data.

The Lead/sub grantee shall maintain a list of such staff and their signed *DSHS Nondisclosure of Confidential Information – Non Employee* forms. These forms must be updated annually and submitted to Commerce upon request.

**Limitations on Use of Data:** If the Data and analyses generated by the Lead/sub grantee contain personal information about DSHS clients, then any and all reports utilizing the~~se~~ Data shall be subject to review and approval by Commerce prior to publication in any medium or presentation in any forum.

**1. Definitions**. The words and phrases listed below, as used in this Exhibit, shall each have the following definitions:

a. "AES" means the Advanced Encryption Standard, a specification of Federal Information Processing Standards Publications for the encryption of electronic data issued by the National Institute of Standards and Technology (http://nvlpubs.nist.gov/nistpubs/FIPS/NIST.FIPS.197.pdf).

b. "Authorized Users(s)" means an individual or individuals with a business need to access DSHS Confidential Information, and who has or have been authorized to do so.

c. "Business Associate Agreement" means an agreement between DSHS and a contractor who is receiving Data covered under the Privacy and Security Rules of the Health Insurance Portability and Accountability Act of 1996. The agreement establishes permitted and required uses and disclosures of protected health information (PHI) in accordance with HIPAA requirements and provides obligations for business associates to safeguard the information.

d. "Category 4 Data" is data that is confidential and requires special handling due to statutes or regulations that require especially strict protection of the data and from which especially serious consequences may arise in the event of any compromise of such data. Data classified as Category 4 includes but is not limited to data protected by: the Health Insurance Portability and Accountability Act (HIPAA), Pub. L. 104-191 as amended by the Health Information Technology for Economic and Clinical Health Act of 2009 (HITECH), 45 CFR Parts 160 and 164; the Family Educational Rights and Privacy Act (FERPA), 20 U.S.C. §1232g; 34 CFR Part 99; Internal Revenue Service Publication 1075 (https://www.irs.gov/pub/irs-pdf/p1075.pdf); Substance Abuse and Mental Health Services Administration regulations on Confidentiality of Alcohol

and Drug Abuse Patient Records, 42 CFR Part 2; and/or Criminal Justice Information Services, 28 CFR Part 20.

e. "Cloud" means data storage on servers hosted by an entity other than the Contractor and on a network outside the control of the Contractor. Physical storage of data in the cloud typically spans multiple servers and often multiple locations. Cloud storage can be divided between consumer grade storage for personal files and enterprise grade for companies and governmental entities. Examples of consumer grade storage would include iTunes, Dropbox, Box.com, and many other entities. Enterprise cloud vendors include Microsoft Azure, Amazon Web Services, and Rackspace.
f. "Encrypt" means to encode Confidential Information into a format that can only be read by those possessing a "key"; a password, digital certificate or other mechanism available only to authorized users. Encryption must use a key length of at least 256 bits for symmetric keys, or 2048 bits for asymmetric keys. When a symmetric key is used, the Advanced Encryption Standard (AES) must be used if available.
g. "FedRAMP" means the Federal Risk and Authorization Management Program (see www.fedramp.gov), which is an assessment and authorization process that federal government agencies have been directed to use to ensure security is in place when accessing Cloud computing products and services.
h. "Hardened Password" means a string of at least eight characters containing at least three of the following four character classes: Uppercase alphabetic, lowercase alphabetic, numeral, and special characters such as an asterisk, ampersand, or exclamation point.
i. "Mobile Device" means a computing device, typically smaller than a notebook, which runs a mobile operating system, such as iOS, Android, or Windows Phone. Mobile Devices include smart phones, most tablets, and other form factors.
j. "Multi-factor Authentication" means controlling access to computers and other IT resources by requiring two or more pieces of evidence that the user is who they claim to be. These pieces of evidence consist of something the user knows, such as a password or PIN; something the user has such as a key card, smart card, or physical token; and something the user is, a biometric identifier such as a fingerprint, facial scan, or retinal scan. "PIN" means a personal identification number, a series of numbers which act as a password for a device. Since PINs are typically only four to six characters, PINs are usually used in conjunction with another factor of authentication, such as a fingerprint.
k. "Portable Device" means any computing device with a small form factor, designed to be transported from place to place. Portable devices are primarily battery powered devices with base computing resources in the form of a processor, memory, storage, and network access. Examples include, but are not limited to, mobile phones, tablets, and laptops. Mobile Device is a subset of Portable Device.
l. "Portable Media" means any machine-readable media that may routinely be stored or moved independently of computing devices. Examples include magnetic tapes, optical discs (CDs or DVDs), flash memory (thumb drive) devices, external hard drives, and internal hard drives that have been removed from a computing device.
m. "Secure Area" means an area to which only authorized representatives of the entity possessing the Confidential Information have access, and access is controlled through use of a key, card key, combination lock, or comparable mechanism. Secure

Areas may include buildings, rooms or locked storage containers (such as a filing cabinet or desk drawer) within a room, as long as access to the Confidential Information is not available to unauthorized personnel. In otherwise Secure Areas, such as an office with restricted access, the Data must be secured in such a way as to prevent access by non-authorized staff such as janitorial or facility security staff, when authorized Contractor staff are not present to ensure that non-authorized staff cannot access it.

n. "Trusted Network" means a network operated and maintained by the Contractor, which includes security controls sufficient to protect DSHS Data on that network. Controls would include a firewall between any other networks, access control lists on networking devices such as routers and switches, and other such mechanisms which protect the confidentiality, integrity, and availability of the Data.

o. "Unique User ID" means a string of characters that identifies a specific user and which, in conjunction with a password, passphrase or other mechanism, authenticates a user to an information system.

**2. Authority**. The security requirements described in this document reflect the applicable requirements of Standard 141.10 (https://ocio.wa.gov/policies) of the Office of the Chief Information Officer for the state of Washington, and of the DSHS Information Security Policy and Standards Manual. Reference material related to these requirements can be found here: https://www.dshs.wa.gov/fsa/central-contract-services/keeping-dshs-client-information-private-and-secure, which is a site developed by the DSHS Information Security Office and hosted by DSHS Central Contracts and Legal Services.

**3. Administrative Controls.** The Lead/sub grantee must have the following controls in place:

a. A documented security policy governing the secure use of its computer network and systems, and which defines sanctions that may be applied to Lead/sub grantee staff for violating that policy.

**4. Authorization, Authentication, and Access.** In order to ensure that access to the Data is limited to authorized staff, the Lead/sub grantee must:

a. Have documented policies and procedures governing access to systems with the shared Data.

b. Restrict access through administrative, physical, and technical controls to authorized staff.

c. Ensure that user accounts are unique and that any given user account logon ID and password combination is known only to the one employee to whom that account is assigned. For purposes of non-repudiation, it must always be possible to determine which employee performed a given action on a system housing the Data based solely on the logon ID used to perform the action.

d. Ensure that only authorized users are capable of accessing the Data.

e. **Ensure that an employee's access to the Data is removed immediately:**
   **(1) Upon suspected compromise of the user credentials.**
   **(2) When their employment is terminated.**
   **(3) When they no longer need access to the Data.**

f. Have a process to periodically review and verify that only authorized users have access to systems containing DSHS Confidential Information.

g. When accessing the Data from within the Lead/sub grantee's network (the Data

stays within the Lead/sub grantee's network at all times), enforce password and logon requirements for users within the Lead/sub grantee network, including:

(1) A minimum length of 8 characters and containing at least three of the following character classes: uppercase letters, lowercase letters, numerals, and special characters such as an asterisk, ampersand, or exclamation point.

(2) That a password does not contain a user's name, logon ID, or any form of their full name.

(3) That a password does not consist of a single dictionary word. A password may be formed as a passphrase which consists of multiple dictionary words.

(4) That passwords are significantly different from the previous four passwords. Passwords that increment by simply adding a number are not considered significantly different.

h. When accessing Confidential Information from an external location (the Data will traverse the Internet or otherwise travel outside the Lead/sub grantee network), mitigate risk and enforce password and logon requirements for users by employing measures including:

(1) Ensuring mitigations applied to the system don't allow end-user modification.

(2) Not allowing the use of dial-up connections.

(3) Using industry standard protocols and solutions for remote access. Examples would include RADIUS and Citrix.

(4) Encrypting all remote access traffic from the external workstation to Trusted Network or to a component within the Trusted Network. The traffic must be encrypted at all times while traversing any network, including the Internet, which is not a Trusted Network.

(5) Ensuring that the remote access system prompts for re-authentication or performs automated session termination after no more than 30 minutes of inactivity.

(6) Ensuring use of Multi-factor Authentication to connect from the external end point to the internal end point.

i. Passwords or PIN codes may meet a lesser standard if used in conjunction with another authentication mechanism, such as a biometric (fingerprint, face recognition, iris scan) or token (software, hardware, smart card, etc.) in that case:

(1) The PIN or password must be at least 5 letters or numbers when used in conjunction with at least one other authentication factor

(2) Must not be comprised of all the same letter or number (11111, 22222, aaaaa, would not be acceptable)

(3) Must not contain a "run" of three or more consecutive numbers (12398, 98743 would not be acceptable)

j. If the contract specifically allows for the storage of Confidential Information on a Mobile Device, passcodes used on the device must:

(1) Be a minimum of six alphanumeric characters.

(2) Contain at least three unique character classes (upper case, lower case, letter, number).

(3) Not contain more than a three consecutive character run. Passcodes consisting of 12345, or abcd12 would not be acceptable.

k. Render the device unusable after a maximum of 10 failed logon attempts.

**5. Protection of Data**. The Lead/sub grantee agrees to store Data on one or more of the following media and protect the Data as described:

a. **Hard disk drives**. For Data stored on local workstation hard disks, access to the Data will be restricted to Authorized User(s) by requiring logon to the local workstation using a Unique User ID and Hardened Password or other authentication mechanisms which provide equal or greater security, such as biometrics or smart cards.

b. **Network server disks**. For Data stored on hard disks mounted on network servers and made available through shared folders, access to the Data will be restricted to Authorized Users through the use of access control lists which will grant access only after the Authorized User has authenticated to the network using a Unique User ID and Hardened Password or other authentication mechanisms which provide equal or greater security, such as biometrics or smart cards. Data on disks mounted to such servers must be located in an area which is accessible only to authorized personnel, with access controlled through use of a key, card key, combination lock, or comparable mechanism.
For DSHS Confidential Information stored on these disks, deleting unneeded Data is sufficient as long as the disks remain in a Secure Area and otherwise meet the requirements listed in the above paragraph. Destruction of the Data, as outlined below in Section 8 Data Disposition, may be deferred until the disks are retired, replaced, or otherwise taken out of the Secure Area.

c. **Optical discs (CDs or DVDs) in local workstation optical disc drives**. Data provided by DSHS on optical discs which will be used in local workstation optical disc drives and which will not be transported out of a Secure Area. When not in use for the contracted purpose, such discs must be Stored in a Secure Area. Workstations which access DSHS Data on optical discs must be located in an area which is accessible only to authorized personnel, with access controlled through use of a key, card key, combination lock, or comparable mechanism.

d. **Optical discs (CDs or DVDs) in drives or jukeboxes attached to servers**. Data provided by DSHS on optical discs which will be attached to network servers and which will not be transported out of a Secure Area. Access to Data on these discs will be restricted to Authorized Users through the use of access control lists which will grant access only after the Authorized User has authenticated to the network using a Unique User ID and Hardened Password or other authentication mechanisms which provide equal or greater security, such as biometrics or smart cards. Data on discs attached to such servers must be located in an area which is accessible only to authorized personnel, with access controlled through use of a key, card key, combination lock, or comparable mechanism.

e. **Paper documents**. Any paper records must be protected by storing the records in a Secure Area which is only accessible to authorized personnel. When not in use, such records must be stored in a Secure Area.

f. **Remote Access**. Access to and use of the Data over the State Governmental Network (SGN) or Secure Access Washington (SAW) will be controlled by DSHS staff who will issue authentication credentials (e.g. a Unique User ID and

Hardened Password) to Authorized Users on Contractor's staff. Contractor will notify DSHS staff immediately whenever an Authorized User in possession of such credentials is terminated or otherwise leaves the employ of the Contractor, and whenever an Authorized User's duties change such that the Authorized User no longer requires access to perform work for this Contract.

g. **Data storage on portable devices or media**.

(1) Except where otherwise specified herein, DSHS Data shall not be stored by the Lead/sub grantee on portable devices or media unless specifically authorized within the terms and conditions of the Grant. If so authorized, the Data shall be given the following protections:

(a) Encrypt the Data.

(b) Control access to devices with a Unique User ID and Hardened Password or stronger authentication method such as a physical token or biometrics.

(c) Manually lock devices whenever they are left unattended and set devices to lock automatically after a period of inactivity, if this feature is available. Maximum period of inactivity is 20 minutes.

(d) Apply administrative and physical security controls to Portable Devices and Portable Media by:

i. Keeping them in a Secure Area when not in use,

ii. Using check-in/check-out procedures when they are shared, and

iii. Taking frequent inventories.

(2) When being transported outside of a Secure Area, Portable Devices and Portable Media with DSHS Confidential Information must be under the physical control of Lead/sub grantee staff with authorization to access the Data, even if the Data is encrypted.

h. **Data stored for backup purposes**.

(1) DSHS Confidential Information may be stored on Portable Media as part of a Lead/sub grantee's existing, documented backup process for business continuity or disaster recovery purposes. Such storage is authorized until such time as that media would be reused during the course of normal backup operations. If backup media is retired while DSHS Confidential Information still exists upon it, such media will be destroyed at that time in accordance with the disposition requirements below in Section 8 *Data Disposition*.

(2) Data may be stored on non-portable media (e.g. Storage Area Network drives, virtual media, etc.) as part of a Lead/sub grantee's existing, documented backup process for business continuity or disaster recovery purposes. If so, such media will be protected as otherwise described in this exhibit. If this media is retired while DSHS Confidential Information still exists upon it, the data will be destroyed at that time in accordance with the disposition requirements below in Section 8 *Data Disposition*.

i. **Cloud storage**. DSHS Confidential Information requires protections equal to or greater than those specified elsewhere within this exhibit. Cloud storage of Data is problematic as neither DSHS nor the Lead/sub grantee has control of the environment in which the Data is stored. For this reason:

(1) DSHS Data will not be stored in any consumer grade Cloud solution, unless all of the following conditions are met:
   (a) Lead/sub grantee has written procedures in place governing use of the Cloud storage and Contractor attests in writing that all such procedures will be uniformly followed.
   (b) The Data will be Encrypted while within the Lead/sub grantee network.
   (c) The Data will remain Encrypted during transmission to the Cloud.
   (d) The Data will remain Encrypted at all times while residing within the Cloud storage solution.
   (e) The Lead/sub grantee will possess a decryption key for the Data, and the decryption key will be possessed only by the Lead/sub grantee and/or DSHS.
   (f) The Data will not be downloaded to non-authorized systems, meaning systems that are not on either the DSHS or Lead/sub grantee networks.
   (g) The Data will not be decrypted until downloaded onto a computer within the control of an Authorized User and within either the DSHS or Lead/sub grantee's network.

(2) Data will not be stored on an Enterprise Cloud storage solution unless either:
   (a) The Cloud storage provider is treated as any other Sub-Contractor, and agrees in writing to all of the requirements within this exhibit; or,
   (b) The Cloud storage solution used is FedRAMP certified.

(3) If the Data includes protected health information covered by the Health Insurance Portability and Accountability Act (HIPAA), the Cloud provider must sign a Business Associate Agreement prior to Data being stored in their Cloud solution.

**6. System Protection**. To prevent compromise of systems which contain DSHS Data or through which that Data passes:

a. Systems containing DSHS Data must have all security patches or hotfixes applied within 3 months of being made available.

b. The Lead/sub grantee will have a method of ensuring that the requisite patches and hotfixes have been applied within the required timeframes.

c. Systems containing DSHS Data shall have an Anti-Malware application, if available, installed.

d. Anti-Malware software shall be kept up to date. The product, its anti-virus engine, and any malware database the system uses, will be no more than one update behind current.

**7. Data Segregation**.

a. DSHS Data must be segregated or otherwise distinguishable from non-DSHS data. This is to ensure that when no longer needed by the Lead/sub grantee, all DSHS Data can be identified for return or destruction. It also aids in determining whether DSHS Data has or may have been compromised in the event of a security breach. As such, one or more of the following methods will be used for data segregation.

(1) DSHS Data will be kept on media (e.g. hard disk, optical disc, tape, etc.) which will contain no non-DSHS Data. And/or,

(2) DSHS Data will be stored in a logical container on electronic media, such as a partition or folder dedicated to DSHS Data. And/or,

(3) DSHS Data will be stored in a database which will contain no non-DSHS data. And/or,

(4) DSHS Data will be stored within a database and will be distinguishable from non-DSHS data by the value of a specific field or fields within database records.

(5) When stored as physical paper documents, DSHS Data will be physically segregated from non-DSHS data in a drawer, folder, or other container.

b. When it is not feasible or practical to segregate DSHS Data from non-DSHS data, then both the DSHS Data and the non-DSHS data with which it is commingled must be protected as described in this exhibit.

**8. Data Disposition**. When the contracted work has been completed or when the Data is no longer needed, except as noted above in Section 5.b, Data shall be returned to DSHS or destroyed. Media on which Data may be stored and associated acceptable methods of destruction are as follows:

| Data stored on: | Will be destroyed by: |
|---|---|
| Server or workstation hard disks, or<br><br>Removable media (e.g. floppies, USB flash drives, portable hard disks) excluding optical discs | Using a "wipe" utility which will overwrite the Data at least three (3) times using either random or single character data, or<br><br>Degaussing sufficiently to ensure that the Data cannot be reconstructed, or<br><br>Physically destroying the disk |
| | |
| Paper documents with sensitive or Confidential Information | Recycling through a contracted firm, provided the contract with the recycler assures that the confidentiality of Data will be protected. |
| | |
| Paper documents containing Confidential Information requiring special handling (e.g. protected health information) | On-site shredding, pulping, or incineration |
| | |
| Optical discs (e.g. CDs or DVDs) | Incineration, shredding, or completely defacing the readable surface with a coarse abrasive |
| | |
| Magnetic tape | Degaussing, incinerating or crosscut shredding |

**9. Notification of Compromise or Potential Compromise**. **The compromise or potential compromise of DSHS shared Data must be reported to the subgrantee's CHG contracting entity one (1) business day of discovery.** Subgrantee must also take actions

to mitigate the risk of loss and comply with any notification or other requirements imposed by law or DSHS.

10. **Data shared with Subcontractors**. If DSHS Data provided under this Grant is to be shared with a subcontractor, the Grant with the subcontractor must include all of the data security provisions within this Grant and within any amendments, attachments, or exhibits within this Grant. If the Lead grantee cannot protect the Data as articulated within this Grant, then the contract with the sub grantee must be submitted to COMMERCE for review and approval.

## 10.10 Appendix J: Landlord Verification

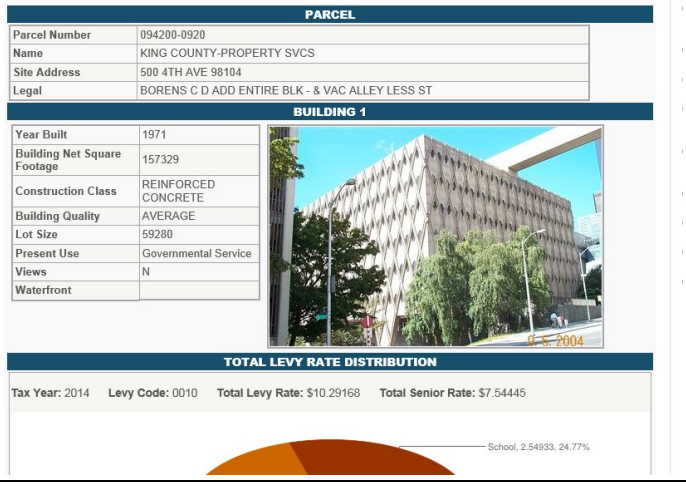
***Required for*** *direct rent assistance. Hotels/motels are exempt from the documentation requirement.*

**Required documentation must be available for King County review upon request:**

a. Copy of lease/rental agreement (for each household)
b. Proof of ownership; one of these items, listed in order of preference:
    i. Print-out of property report from County assessor website; or
    ii. CHG Landlord Certification Form completed by property owner or representative (for property outside of Washington State and only if no county assessor parcel viewer can be found on the Internet)

**Documentation Procedure:**

1. **Obtain a copy of the lease or rental agreement. Including:**
    - Payee
    - Client name (for rent assistance) or Agency name (for facility support)
    - Rental unit address
    - Amount of monthly rent
2. **Note the rental unit address** as listed on the lease/rental agreement.
3. **Document the name of the property owner** by printing the property report from the County Assessor's web page: [info.kingcounty.gov/Assessor/eRealProperty/](info.kingcounty.gov/Assessor/eRealProperty/)

| | |
|---|---|
| **Type in the property address** (or property name) and click **"Search"** to retrieve a property report: |  |

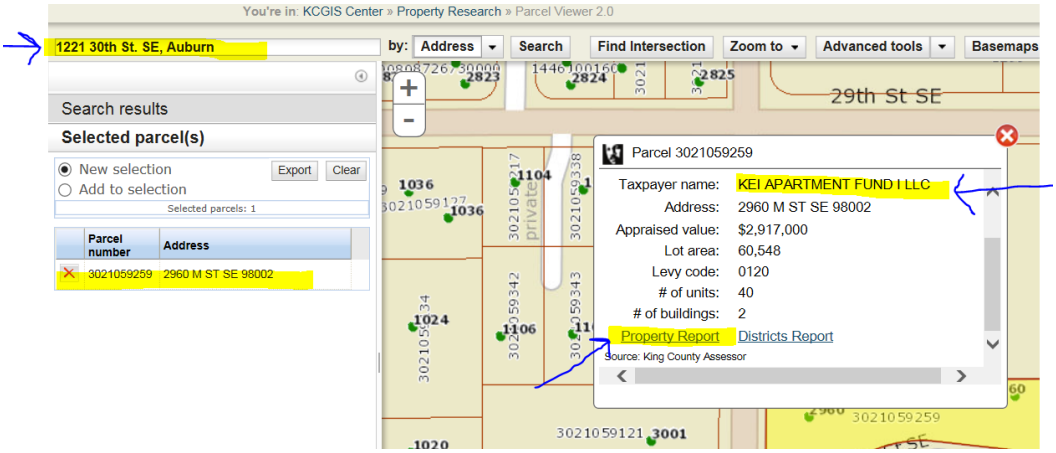
- **Note in the "Parcel" section of the property report the exact "Name" of the property owner.** (In the example above, the property owner is King County-Property Svcs)
- **Print page 1 of the property report for your files.** (Right click and select "print")

***Q: What if the property address (from the lease) does not show up on the web search?***

***A:*** *Sometimes the unit address does not match the parcel address in the County property records. This can happen, for instance, if there is a large apartment building or complex with multiple addresses.*

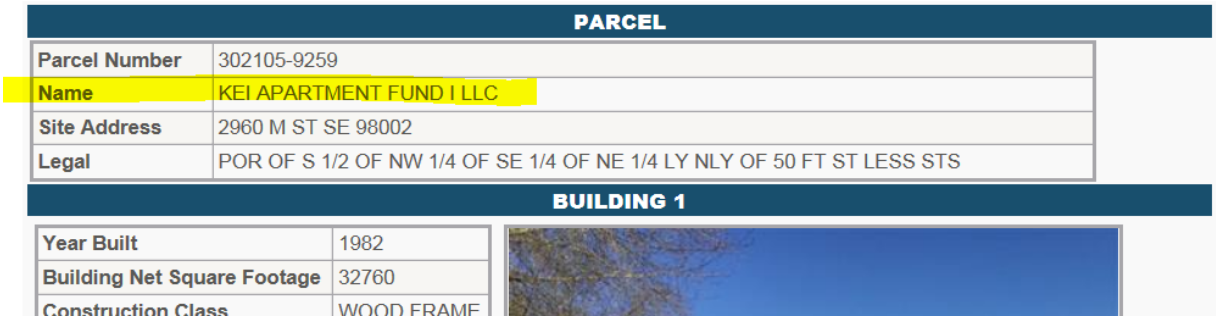
***In that case:*** *First confirm the address on the Parcel viewer page.* ***Then*** *print the property report from the eRealProperty page:*

- ***Connect to the King County Parcel Viewer: http://gismaps.kingcounty.gov/parcelviewer2/***
- ***Click "Start Parcel Viewer"***
- ***In the top left corner type in the property address (or partial address) and click "Search Results".***
- ***Click on the address from the results.***
- ***Then click on the parcel highlighted in the map.***
- *This page will show the parcel number, the parcel address, and the taxpayer's name. We can assume that the taxpayer's name is the property owner.*




- *Scroll down to the very bottom of the parcel "info box"; click on "property report"; then* ***print page 1 of the property report for your files****: (Note the "name" on the property report is the same as the "taxpayer name" on the parcel viewer. Either of those can be considered the name of the property owner.)*
- *Write a note on the printed property report that "this parcel address was confirmed as a match for (property address on lease) by parcel viewer search on (date) by (your name)".*

4. **Note from the property report the exact name of the property owner.** (Listed as "Name" on the property report)



| PARCEL | |
|---|---|
| Parcel Number | 302105-9259 |
| Name | KEI APARTMENT FUND I LLC |
| Site Address | 2960 M ST SE 98002 |
| Legal | POR OF S 1/2 OF NW 1/4 OF SE 1/4 OF NE 1/4 LY NLY OF 50 FT ST LESS STS |

| BUILDING 1 | |
|---|---|
| Year Built | 1982 |
| Building Net Square Footage | 32760 |
| Construction Class | WOOD FRAME |

5. **Determine property owner type as follows:**

| | | |
|---|---|---|
| **Individual owner** |  | **Private Landlord** |
| **Business owner** |  | **Private Landlord** |
| **Nonprofit owner** |  | **Private Landlord** |
| **Housing Authority** |  | **Private Landlord** |
| **Tribal government** |  | **Private Landlord** |
| **Government owner** |  | **Government Landlord** |

"Government owned parcels" are identified in the "Tax Roll History" section of the report: **Government Landlord**