



COMMUNITY, HOUSING, AND
HUMAN SERVICES
DEPARTMENT
808 W. SPOKANE FALLS BLVD.
SPOKANE, WASHINGTON 99201
509.625.6325
FAX 509.625.6315

Housing-Related Services

Request for Proposals

2024 Program Year

The City of Spokane assures that grants will be conducted and administered in compliance with Title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d), the Fair Housing Act (42 U.S.C. 3601-3620), the Age Discrimination Act of 1975, Executive Orders 11063, 11625, 12138, 12432 and 12892, Section 504 of the Rehabilitation Act of 1973 (29 U.S.C. 794), the Americans with Disabilities Act (title II) and implementing regulations.



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STAFF CONTACTS

Heather Page, HCD Program Manager	hpage@spokanecity.org	509-625-6578
Arielle Anderson, Director CHHS	areilleanderson@spokanecity.org	509-625-6055
Kimberly Babb, Program Professional	kbabb@spokanecity.org	509-625-6048

FUNDING ALLOCATION SCHEDULE

(Subject to change without notice)

Activity / Process	Date
Notice sent out via e-mail	Wednesday, May 29, 2024
Publish the Public Notice	Wednesday, May 29, 2024
Applications Available	Wednesday, May 29, 2024
Virtual Workshop	Tuesday, June 11, 2024
Applications Due	Wednesday, July 17, 2024
Acknowledgement Letter sent out to all applicants	Friday, July 19, 2024
Staff reviews completed and sent to AFH Committee	Wednesday, July 31, 2024
AFH Committee Application Review Special Meeting	Tuesday, August 20, 2024
AFH Recommendations Reviewed by CHHS Board	Wednesday, September 4, 2024
CHHS Board Recommendations Presented to Council Committee	Monday, September 9, 2024
Council Finalizes Funding Recommendations	Monday, September 23, 2024
Notify Applicants of Funding Decisions	Friday, September 27, 2024
Begin drafting Contracts	October 1, 2024

FUNDING SOURCES

Source	Amount
U.S. Department of Housing and Urban Development, HOME - American Rescue Plan (HOME-ARP)	\$2,546,000.00
*1590 Housing Related Services	\$1,955,000.00

*As authorized by RCW 82.14.530, the City of Spokane collects 0.01 sales tax for use in providing affordable housing and housing related programs within the boundaries of the City of Spokane.

HOUSING-RELATED SERVICES ACTIVITIES

The City of Spokane, through the Community, Housing, and Human Services Department, is seeking proposals for housing-related services projects offered within the City of Spokane.

Two funding sources, for an estimated total of \$4,500,000 are included in this request for proposals.

The City of Spokane's priority goal is to increase the offering of supportive services to qualifying populations. To accomplish this goal, the City of Spokane will consider the following proposals:

- Housing related services projects connected with affordable housing. The supportive services can be offered to qualifying populations at a single location, or scattered site locations.

Approved Activities

Funds may be used for supportive services, program administration, and operations and maintenance of affordable housing-related service programs. All approved activities are defined in **Appendix C**.

Qualifying Populations

Housing-Related services may only be offered to qualifying populations, not already receiving those services through another program. Qualifying individuals or families as those that are:

- Senior citizen, elderly person.
- Person with disabilities, including behavioral disabilities.
- Homeless, as defined in section 103(a) of the McKinney-Vento Homeless Assistance Act, as amended (42 U.S.C. 11302(a)) ("McKinney-Vento"); At risk of homelessness, as defined in section 401 of McKinney-Vento; including families with children.
- Unaccompanied homeless youth or young adults.
- Domestic violence survivors, or persons fleeing, or attempting to flee domestic violence, dating violence, sexual assault, stalking, or human trafficking.
- Veterans and families that include a veteran family member.
- HOME-ARP Only - other populations where providing supportive services or assistance would prevent a family's homelessness or would serve those with the greatest risk of housing instability.

Complete definitions of the qualifying populations can be found in **Appendix D**.

In addition to the qualifying populations restrictions, 1590 funded projects must also meet a 60% AMI household restriction. HOME-ARP funded projects must only meet qualifying populations requirements.

1590 60% AMI Limits can be found at:

<https://static.spokanecity.org/documents/chhs/programs/homeinvestment/2024-home-rent-and-income-limits.pdf>

FUNDING POLICIES

Housing-Related Services program funds will be awarded as reimbursable grants. Projects selected for HOME-ARP funding will receive a maximum three-year contract term. Projects selected for 1590 funding will receive a maximum of a two-year contract term.

ELIGIBLE APPLICANTS:

Applicants must have prior experience in developing and managing the type of project they undertake or must partner with an experienced service provider. Applicants must demonstrate that they or their development team has the skills and experience to manage the project through the contract term. Applicants should also demonstrate knowledge and/or experience in promoting fair housing, and/or in development of an approved analysis of impediments to fair housing, and in facilitating public input, data collection and statistical analysis.

The following types of organizations are eligible to apply for funds:

- Non-profit organizations.
- For-profit entities, including individuals, partnerships, corporations, limited liability companies, and limited liability partnerships.
- Housing Authorities.

LEVERAGING AND LAYERING:

The City expects housing-related services projects to demonstrate that they are leveraging all available funding resources. This leveraging of other funding sources is a consideration in project selection.

Projects must be evaluated to determine if they are receiving an excessive federal subsidy through an analysis of all the funding sources available to the project.

All direct or indirect government assistance must be identified in the application, including contributions of federal, state, and local governments and/or agencies.

NON-DUPLICATION OF SERVICES:

Supportive services projects receiving Continuum of Care, Emergency Solutions Grant and/or Community Development Block Grant funds will only be considered for 1590 funding.

Supportive services projects funded with Continuum of Care (CoC), Emergency Solutions Grant (ESG), and Community Development Block Grant (CDBG) funds, are not eligible for HOME-ARP funding.

Qualifying individuals and families may not receive HOME-ARP supportive services if receiving the same service through another program. Qualifying individuals and families may receive other HOME-ARP services not covered by another program. Projects awarded a HOME-ARP grant will be responsible for

documenting the eligible activities each qualifying individual and household receives and for documenting that no duplication of services has occurred.

PROJECT CONSISTENCY WITH LOCAL PLANS AND CODES:

All projects assisted with housing-related services funds must be consistent with the City's 5-Year Consolidated Plan, the CoC's 5-Year Plan to End Homelessness, and/or the Housing Action Plan.

CONFLICT OF INTEREST:

In allocating funds for affordable housing development and housing related services, the City of Spokane relies on the substantial expertise available from private and public sector individuals who have agreed to volunteer their time. The City recognizes that these individuals, and the entities with which they are associated, may have an interest in applying for the funding made available through this program. While the City recognizes the need to protect against the exercise of undue influence in obtaining benefits made available through this program, the program should be available to those who have the experience, expertise, and willingness to undertake the development of critically needed housing or housing related services for low-income, Spokane residents. At the same time, it is necessary to ensure that the City retains its ability to call upon residents to assist in the ongoing development of the program, without requiring them to forego possible benefits from the program.

The conflict in a conflict of interest exists when there is a perception of conflict regardless of whether a particular individual is influenced by a secondary interest. If the circumstances are reasonably believed (based on experience and objective evidence) to create a risk that decisions made may be unduly influenced by other interests, then a conflict does exist. Any conflict of interest must be disclosed, and the appropriate procedures must be followed. A conflict of interest may be classified as one of the following:

Primary and Material Conflicts of Interests - A project will not be eligible if any of its sponsors, owners, or members of their households or immediate families are directly involved in the evaluation and funding determinations under the program. These include, but are not limited to: 1) members of the Spokane City Council or staff, the CHHS Affordable Housing Committee, the CHHS Board; 2) staff members of the City of Spokane Community, Housing, and Human Services; 3) members, staff members, or family members of any developer consultant or developer membership group; 4) members of any other state or local government unit that has regulatory involvement in the development, site, or approval of the project; and 5) board members and employees of any organization under contract or retained by the City to manage, advise, or assist in the program for compensation.

Remote Conflicts of Interest - A project owner or sponsor must adhere to the following procedures when they or a member of their household or immediate family are directly involved in the management of or serves in a decision or policy making capacity with the program. In addition, these procedures must be adhered to if the sponsor is a membership group, corporation or partnership and there is a director, officer, partner, or shareholder who is directly involved in the management of or serves in a decision or policy making capacity with the program. Under such circumstances, the project sponsor or owner must:

1. disclose in writing the existence and extent of a conflict of interest and the individual, or group's interest in the project to the program staff and/or Director of the City of Spokane Community, Housing, and Human Services Department;
2. the individual, or group with a conflict of interest must remove himself/herself from all involvement in the process of evaluating and determining whether the project is eligible for, and/or approved for, funding;
3. the individual, or group with a conflict of interest must refrain from influencing any other person involved in evaluating and/or determining whether the project is eligible for, and/or approved for, funding; and/or
4. an individual, or group with a conflict of interest regarding project proposals under consideration will not vote on or rank projects during the funding round in which his/her project is being considered.

The application includes a conflict-of-interest form to be used in disclosing conflicts of interest. All owners/developers/sponsors/providers must review and complete the form. The CHHS Director will consult with City Legal regarding all potential conflicts of interest and will make decisions concerning conflict of interest issues on an individual basis.

OWNER/ SPONSOR RESPONSIBILITIES:

Project owners/sponsors are responsible for all aspects of their project's development, including, but not limited to, assessing their project's feasibility; cost analysis; budgets; compliance with federal, state, and local requirements; securing additional financial support; maintaining records.

MINIMUM ELIGIBILITY STANDARDS:

All projects must meet certain minimum standards. These include:

- Project costs must be customary, necessary, and reasonable.
- Management plan must evidence the ability and organizational capacity to successfully manage the project during the contract term. Partnerships between less experienced providers and more experienced providers is encouraged.
- Supportive services plan must identify the needs of the targeted population and how those needs will be met.
- Projects must track and report beneficiary data to the City monthly.
- Timelines of the project will be considered, i.e., how soon the project can be underway and completed. Staff should be hired within four months and the project fully operational within 6 months.

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ELIGIBLE COSTS:

Refer to **Appendix C** for definitions of each cost.

Supportive Services
Child care services
Costs of improving knowledge and basic educational skills
Costs of establishing/operating employment assistance/job training programs
Costs of providing reasonable stipends to program participants in employment assistance and job training programs
Meals or groceries
Housing search/HUD certified housing counseling services
Legal services
Life skills training
Mental health services
Outpatient health services
Outreach services
Substance abuse treatment services
Transportation
Case management
Mediation
Credit repair services
Landlord/tenant liaison
Victim services
Rental application fees
Security deposits
Utility deposits/payments
Moving costs
Program Administration
Salaries and Wages
Employee education, training
General administrative costs
Pro-rated Resident Services Coordinator
Operations and Maintenance
Insurance
Utilities
Property taxes
Maintenance of a facility occupied by qualifying households.

PROHIBITED ACTIVITIES:

Eligible costs are listed and described in **Appendix C**.

All other activities are ineligible.

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APPLICATION AND SELECTION PROCESS

Before you begin preparing the application, we recommend that you review this document thoroughly to understand the program specific requirements, as well as the application process.

If anyone involved in the project is also involved in the Housing-Related Services program allocation or administration of funds, please review the conflict-of-interest information. All conflicts will be reviewed by City of Spokane's CHHS Director and City Legal and must be addressed to their satisfaction.

Application Process:

The following outlines the typical process of an application for Housing-Related Services program funds.

- Applicant contacts appropriate staff for Housing-Related Services program technical assistance (if needed).
- Staff responds to applicant with recommendations.
- Owner/Sponsor/Provider submits application and all associated documents via the Neighborly Portal.
- Staff reviews applications, obtains additional information and clarification, and summarizes information for the Affordable Housing Committee.
- The Affordable Housing Committee reviews and scores the proposals, selects proposals for funding, and identifies amounts of funding for each proposal. The Affordable Housing Committee's recommendations are submitted to the CHHS Board for review.
- The CHHS Board reviews the Affordable Housing Committee's funding recommendations. If in agreement with the Affordable Housing Committee, the CHHS Board sends the recommendations to the City Council for final approval.
- Conditional funding commitments will be effective for up to six months, with the possibility of another six months, based upon the project's progress. If a project does not meet these time frames, Housing-Related Services program funds will be made available to alternate projects.
- Housing-Related Services program agreements are executed between the borrower and the City.

Application Submission:

Applications are available at, and will be submitted through the Neighborly portal:

<https://portal.neighborlysoftware.com/SPOKANEWA/Participant>

Complete applications must be submitted in Neighborly by 5:00 p.m., Wednesday, July 17, 2024

Applicants must complete and sign the application forms. Staff will review applications and applicants will be contacted for additional information and clarification if needed. Instructions for completing the application are attached to the application.

Applicants should be advised that projects receiving HOME-ARP funds may be subject to an environmental review.

Project Selection Process:

All applications will receive careful, multi-level reviews. The staff review is conducted under the direction of the City of Spokane Community, Housing, and Human Services Housing & Community Development Program Manager. The manager may require staff to consult with appropriate professionals for opinions concerning aspects of an application. Additionally, applications must meet the following requirements:

- The threshold eligibility screening will be completed within three weeks from the date of receipt. The purpose of the screening is to determine the completeness of each application, and project eligibility for either funding source.
- Staff may request additional information if the applications are deemed incomplete.
- The Affordable Housing Committee review and rating period will take approximately two weeks following the threshold review, depending on the number of applications.
- Projects must be completed within two years from date of executed contract if awarded 1590 funds, subject to conditions issued in the City's allocation letter, Contract, or Written Agreement. Project must be completed within three years from date of executed contract if awarded HOME-ARP funds, subject to conditions issued in the City's allocation letter, Contract, or Written Agreement.
- Applicants wishing to request reconsideration of awards must submit a request to the CHHS director within seven calendar days following notification of funding decisions.
- Applicants not selected for funding may request application feedback following the issuance of award notifications.

Disclaimer: City of Spokane CHHS Department reserves the right to not award all available funds if submitted proposals do not meet the evaluation and funding criteria or do not address the program priorities. Funds not allocated during a funding cycle may be awarded during a subsequent application cycle. Federal deadlines for funds commitment may require reallocation of funds if implementation of a project is significantly delayed.

Evaluation Criteria:

Projects will be evaluated based in part on conceptual soundness, financial feasibility, and organizational capacity and project readiness. A brief description concerning each factor is listed below.

- **Conceptual Soundness** - The project design is well-defined, feasible, and consistent with community plans. The program design clearly defines the services offered, the project objectives, how outcomes will be measured, the intake process and the process for determining household eligibility. The program design is appropriate for the qualifying populations. Elements of the project concept meet all threshold and eligibility requirements of the funding sources. The project promotes fair housing or partners with organizations that promote fair housing.
- **Financial Feasibility** - Budget forms are consistent, accurate, and thorough. The proposed budget covers the total costs for the project and identifies the total funds committed to the project. Estimates and costs are reasonable and well supported or justified. A rigorous attempt to leverage other funds is documented. Proposed sources of funds are matched to eligible activities. Current

projects in the service provider’s portfolio are fiscally healthy, no audit findings, no public reports of fiscal instability. Documentation of conditional and committed funds is included.

- **Organizational Capacity and Project Readiness** - The skills and experience of the project sponsor organization and the project management team are appropriate to the size and complexity of the project, or the project sponsor organization partners with an experienced management team appropriate for the size and complexity of the project. Project sponsor organization has written commitments from all partner organizations. The sponsor organization has reliable systems and personnel to manage and account for public funds. The project’s management plan assures reasonable operation of the project or program for the length of commitment. The project can be fully operational within six months of the initial contract date.

Administrative Requirements:

The CHHS Department often receives inquiries about administrative details. The following information addresses questions frequently asked by applicants:

- Housing-Related Services program funds for approved projects will be disbursed on a reimbursement basis, upon presentation of an acceptable request for funds, and all required documentation of expenses as outlined in the contract or other legal documents.
- Requests for payment must be reviewed for eligibility and approved by City staff before they can be paid. Requests for payment are typically paid within 30 days of receipt.

TECHNICAL ASSISTANCE

Virtual Workshop

3:00-4:00 p.m. on Tuesday, June 11, 2024.

Please contact HCD Team Program Manager, Heather Page at hpage@spokanecity.org for an invitation.

Individual Technical Assistance Meetings

Individual technical assistance meetings are available by appointment through Friday, July 12, 2024. Contact the following staff to schedule an appointment:

Heather Page, HCD Program Manager	hpage@spokanecity.org	509-625-6578
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APPENDIX A, DEFINITIONS

Accessibility - Depending upon its size or funding, a project may be required to make alterations to, or construct a portion of, units as accessible to persons with disabilities to comply with Section 504 of the Rehabilitation Act of 1973 (24 CFR 8), the Americans with Disabilities Act, Washington State, City of Spokane Code and/or other local requirements.

Affirmative Marketing - Direct marketing efforts or outreach to those populations, which may need special consideration in regard to receiving CDBG or HOME funded services, housing, or economic opportunities, without regard to race, color, national origin, sex, religion, familial status or disability. Procurement activities must encourage the use of minority and women-owned businesses consistent with 24 CFR Part 92 §351. Multi-family projects (five or more units) are required to practice affirmative marketing in advertising vacancies per the Fair Housing Act 42 USC 3601.

Affordable Housing - Housing for which monthly costs, including rent or mortgage payments and utilities, do not exceed 60% of a low-income household's monthly income adjusted for family size.

By-and-For Agency – By and For Organizations are operated by and for the community they serve. Their primary mission and history is serving a specific community and they are culturally based, directed, and substantially controlled by individuals from the population they serve.

Children and Youth - Persons less than 18 years of age.

Disabilities (persons with) - Individuals with a physical or mental impairment that substantially limits major life activities, has a history of such impairment, or is regarded as having such impairment.

Environmental Review – National Environmental Policy Act of 1969 (NEPA) 24 CFR 58 – City staff will perform a NEPA assessment of the subject property following receipt of a project application, if applicable. A 30-day public comment period and HUD Release of Funds may be required. Mitigation of environmental impacts may be required. This environmental assessment does not supersede state and local environmental review.

Extremely Low-income Persons - A member of a household, which has a gross annual income at or below 30% of the area median annual income adjusted by household size.

Fair Housing - Under Federal Fair Housing law, it is illegal to deny the opportunity to qualify for housing on the basis of race, religion, color, sex, national origin, family status or disability.

Fair Market Rent – Fair Market Rent means the rent that would be required to be paid in a particular housing market area in order to obtain privately owned, decent, safe, and sanitary rental housing of modest (non-luxury) nature with suitable amenities. Rents are established by the Department of Housing and Urban Development for dwelling units of different sizes (number of bedrooms). Fair Market Rent includes utilities, except telephone and cable television.

501(c)(3) Corporation - A non-profit corporation which has received a tax-exempt ruling from the Internal Revenue Service under Section 501(c)(3) of the Internal Revenue Code of 1986.

Group Home - Single family home converted to a dwelling for multiple households. Often directed at special needs populations (such as disabled veterans or battered women) who do not require constant supervision, but who are not ready, financially and/or physically, for independent living.

Low-Income Persons - A member of a household, which has a gross annual income at or below 80% of the area median annual income adjusted by household size.

Median Family Income - Household income adjusted for family size in an urban area.

Multi-family Property - Five or more units where each unit is equipped with a bathroom and kitchen.

Non-Profit Corporation – A corporation which has received certification from the Internal Revenue Service as to its non-profit status. Typically, these receive a tax-exempt ruling from the Internal Revenue Service under section 501(c) (3) or (4) of the IRS Code of 1986.

Permanent Supportive Housing - Permanent supportive housing is affordable housing for very low and extremely low-income individuals and families that is linked to a range of support services that enables special needs populations to live as independently as possible without a time limit on residency. The supportive services may be provided directly by the owner, developer, sponsor, or by service providers under a written agreement.

Section 3 of the Housing and Urban Development Act of 1968 - To the greatest extent *feasible*, low-income persons will benefit from training and employment arising from the use of federal funds. In addition, efforts shall be made to obtain contracts from locally owned businesses.

Single Family Property - Detached or attached homes (one to four units); each home designated for one household.

Single Room Occupancy (SRO) - Units with sanitary or food preparation area, or both, if new construction. If rehabilitation, unit may or may not have sanitary and food preparation areas. Units may have common facilities. Does not include student housing.

Transitional Facilities - Complexes providing living units and services (e.g., counseling, job training, and housing placement) for a certain population, such as the homeless, the mentally ill, or battered women.

Uniform Physical Condition Standards (UPCS) - Minimum health and safety standards established under 24 CFR 92.251(b)(1)(viii).

Very Low-income Persons - A member of a household, which has a gross annual income at or below 50% of the area median annual income adjusted by household size.

APPENDIX B, REGULATIONS/REQUIREMENTS

The following is a list of regulations and requirements which typically apply to housing projects financed with federal funds. Individual projects may be subject to additional laws and regulations. By signing an application for financial assistance from the City of Spokane Community Services, Housing, and Community Development Department, project sponsors agree to comply with **all** applicable laws and regulations.

Federal Statutes:

- (i) Americans with Disabilities Act;
- (ii) The Fair Housing Act (42 USC 3601-3620) and The Fair Housing Amendments Act of 1988;
- (iii) Architectural Barriers Act of 1968;
- (iv) Housing and Community Development Act of 1974 and Housing and Community Development Act of 1992, Title X, including the “Barney Frank Amendments” Section 104 (d);
- (v) Civil Rights Act of 1964 (42 USC 2000 d et. Seq.), and Civil Rights Act of 1968;
- (vi) Age Discrimination Act of 1975 (42 USC 6101);
- (vii) Housing and Urban Development Act of 1968;
- (viii) Uniform Relocation and Real Property Acquisition Policies Act of 1970;
- (ix) Rehabilitation Act of 1973;
- (x) Davis-Bacon Act, and related acts;
- (xi) Contract Work Hours and Safety Standards Act;
- (xii) Copeland (Antikick back) Act (40 USC 276 c);
- (xiii) Fair Labor Standards Act of 1938;
- (xiv) Flood Disaster Protection Act of 1973;
- (xv) National Environmental Policies Act of 1969 (42 USC 4321);
- (xvi) Stewart B. McKinney Homeless Assistance Act.
- (xvii) Violence Against Women Act

Federal Regulations and Executive Orders:

- (i) 24 CFR Part 1, 24 CFR Part 5, 24 CFR Part 35, 24 CFR Part 58, 24 CFR Part 75, 24 CFR 85, 24 CFR Part 92, 24 CFR Part 92.350, 24 CFR Part 92.504(c)(3), 24 CFR Part 100-115, 24 CFR Part 146;
- (ii) 29 CFR 1910.1200, 29 CFR Part 1926.62;
- (iii) 49 CFR Part 24;
- (iv) Executive Order 11063 as amended by Executive Order 12259; and
- (v) Executive Order 11246.

State Statutes:

- (i) Washington State Environmental Policy Act;
- (ii) Washington State Worker's Compensation Industrial Insurance Act;
- (iii) Washington State Fair Housing Laws; and
- (iv) Washington State Landlord/Tenant Act; and
- (v) RCW 82.14.530 Sales and Use Tax for Housing and Related Services

Local:

- (i) City of Spokane Building and Zoning Codes
- (ii) SMC 08.07C Sales and Use Tax for Housing and Housing-Related Supportive Services
- (iii) City of Spokane Consolidated Plan, 2020-2024
- (iv) Spokane County/City of Spokane Continuum of Care Five-Year Plan to End Homelessness 2020-2024

APPENDIX C, ELIGIBLE HOUSING-RELATED SERVICES COSTS

Supportive Services, Program Administration, Operations and Maintenance

Supportive Services

Eligible supportive services costs include:

(A) Child care: The costs of child care for program participants, including providing meals and snacks, and comprehensive and coordinated developmental activities, are eligible. The childcare center must be licensed by the jurisdiction in which it operates in order for its costs to be eligible. The following conditions also apply:

- Children must be under the age of 13 unless the children have a disability.
- Children with a disability must be under the age of 18.

(B) Education services: The costs of improving knowledge and basic educational skills are eligible costs including:

- Instruction or training in consumer education, health education, substance abuse prevention, literacy, English as a Second Language, and General Educational Development (GED).
- Screening, assessment, and testing; individual or group instruction; tutoring; provision of books, supplies, and instructional material; counseling; and referral to community resources.

(C) Employment assistance and job training: The costs of establishing and/or operating employment assistance and job training programs are eligible, including classroom, online and/or computer instruction, on-the-job instruction, services that assist individuals in securing employment, acquiring learning skills, and/or increasing earning potential. The cost of providing reasonable stipends to program participants in employment assistance and job training programs is also an eligible cost.

- Learning skills include those skills that can be used to secure and retain a job, including the acquisition of vocational licenses and/or certificates.
- Services that assist individuals in securing employment consist of:
 - Employment screening, assessment, or testing;
 - Structured job skills and job-seeking skills;
 - Special training and tutoring, including literacy training and pre-vocational training;
 - Books and instructional material;
 - Counseling or job coaching; and
 - Referral to community resources.

(D) Food: The cost of providing meals or groceries to program participants is eligible.

(E) Housing search and counseling services: Costs of assisting eligible program participants to locate, obtain, and retain suitable housing are eligible. Services are:

- Development of an action plan for locating housing;
- Housing search;
- Tenant counseling;
- Securing utilities;
- Making moving arrangements;
- Outreach to and negotiation with owners;
- Assistance submitting rental applications and understanding leases;
- Assistance obtaining utilities; and
- Tenant counseling;
- Mediation with property owners and landlords on behalf of eligible program participants;
- Credit counseling, accessing a free personal credit report, and resolving personal credit issues; and
- Payment of rental application fees;

(F) Legal services: Eligible costs are the fees charged by licensed attorneys and by person(s) under the supervision of licensed attorneys, for advice and representation in matters that interfere with a

- Eligible subject matters are child support; guardianship; paternity; emancipation; legal separation; orders of protection and other legal remedies for victims of domestic violence, dating violence, sexual assault, human trafficking, and stalking; appeal of veterans and public benefit claim denials; landlord-tenant disputes; and the resolution of outstanding criminal warrants; landlord/tenant matters, provided that the services must be necessary to resolve a legal problem that prohibits the program participant from obtaining permanent housing or will likely result in the program participant losing the permanent housing in which the program participant currently resides.
- Legal services for immigration and citizenship matters and for issues related to mortgages and homeownership are ineligible. Retainer fee arrangements and contingency fee
- Services may include client intake, receiving and preparing cases for trial, provision of legal advice, representation at hearings, and counseling.
- Fees based on the actual service performed (i.e., fee for service) are also eligible, but only if the cost would be less than the cost of hourly fees. Filing fees and other necessary court costs are also eligible. If the subrecipient is a legal services provider and performs the services itself, the eligible costs are the subrecipient's employees' salaries and other costs necessary to perform the services.

(G) Life skills training: The costs of teaching critical life management skills that may never have been learned or have been lost during the course of physical or mental illness, domestic violence, dating violence, sexual assault, stalking, human trafficking, substance abuse, and homelessness are eligible. These services must be necessary to assist the program participant to function independently in the community. Life skills training includes:

- the budgeting of resources and money management, household management, conflict management, shopping for food and other needed items, nutrition, the use of public transportation, and parent training.

(H) Mental health services: Eligible costs are the direct outpatient treatment of mental health conditions that are provided by licensed professionals.

- Mental health services are the application of therapeutic processes to personal, family, situational, or occupational problems in order to bring about positive resolution of the problem or improved individual or family functioning or circumstances. Problem areas may include family and marital relationships, parent-child problems, or symptom management.
- Services are crisis interventions; counseling; individual, family, or group therapy sessions; the prescription of psychotropic medications or explanations about the use and management of medications; and combinations of therapeutic approaches to address multiple problems.

(I) Outpatient health services: Eligible costs are the direct outpatient treatment of medical conditions when provided by licensed medical professionals including:

- Providing an analysis or assessment of a program participant's health problems and the development of a treatment plan;
- Assisting program participants to understand their health needs;
- Providing directly or assisting program participants to obtain and utilize appropriate medical treatment;
- Preventive medical care and health maintenance services, including in-home health services and emergency medical services;
- Provision of appropriate medication;
- Providing follow-up services; and
- Preventive and non-cosmetic dental care.

(J) Outreach services: The costs of activities to engage qualified populations for the purpose of providing immediate support and intervention, as well as identifying potential program participants, are eligible.

- Eligible costs include the outreach worker's transportation costs and a cell phone to be used by the individual performing the outreach.
- Costs associated with the following services are eligible: initial assessment; crisis counseling; addressing urgent physical needs, such as providing meals, blankets, clothes, or toiletries; actively connecting and providing people with information and referrals to homeless and mainstream programs; and publicizing the availability of the housing and/or services provided within the Spokane.

(K) Substance abuse treatment services: Eligible substance abuse treatment services are designed to prevent, reduce, eliminate, or deter relapse of substance abuse or addictive behaviors and are provided by licensed or certified professionals. The costs include:

- Program participant intake and assessment;

- Outpatient treatment;
- Group and individual counseling
- Drug testing;
- Inpatient detoxification and other inpatient drug or alcohol treatment are ineligible.

(L) Transportation: Eligible costs are:

- The costs of program participant's travel on public transportation or in a vehicle provided by the subrecipient to and from medical care, employment, childcare, or other services eligible under this Notice;
- Mileage allowance for service workers to visit program participants and to carry out housing inspections;
- The cost of purchasing or leasing a vehicle in which staff transports program participants and/or staff serving program participants;
- The cost of gas, insurance, taxes, and maintenance for the vehicle;
- The costs of subrecipient staff to accompany or assist program participants to utilize public transportation; and
- If public transportation options are not sufficient within the area, the subrecipient may make a one-time payment on behalf of a program participant needing car repairs or maintenance required to operate a personal vehicle, subject to the following:
 - Payments for car repairs or maintenance on behalf of the program participant may not exceed 10 percent of the Blue Book value of the vehicle (Blue Book refers to the guidebook that compiles and quotes prices for new and used automobiles and other vehicles of all makes, models, and types);
 - Payments for car repairs or maintenance must be paid by the subrecipient directly to the third party that repairs or maintains the car; and
 - Subrecipients may require program participants to share in the cost of car repairs or maintenance as a condition of receiving assistance with car repairs or maintenance.
- The subrecipient must establish policies and procedures surrounding payments for the cost of gas, insurance, taxes, the one-time payment for car repairs or maintenance described above, and maintenance for vehicles of program participants. Such costs must be limited to program participants with the inability to pay for such costs and who, without such assistance, would not be able to participate in program. Policies and procedures must be submitted to the City and approved by the City prior to funds being reimbursed to the subrecipient.

(M) Case management: The costs of assessing, arranging, coordinating, and monitoring the delivery of individualized services to meet the needs of the program participant(s) are eligible costs. Subrecipients providing these supportive services must have written standards for providing the assistance. Eligible costs are those associated with the following services and activities:

- Conducting the initial evaluation, including verifying and documenting eligibility, for individuals and families applying for supportive services;
- Counseling;
- Developing, securing, and coordinating services;

- Projects receiving 1590 funds may use the Coordinated Entry system. Projects receiving HOME-ARP funds *may not* use the Coordinated Entry system.
- Obtaining federal, State, and local benefits;
- Monitoring and evaluating program participant progress;
- Providing information and referrals to other providers;
- Providing ongoing risk assessment and safety planning with victims of domestic violence, dating violence, sexual assault, stalking, and human trafficking;
- Developing an individualized housing and service plan, including planning a path to permanent housing stability; and
- Conducting re-evaluations of the program participant's eligibility and the types and amounts of assistance the program participant needs.

(N) Mediation: funds may pay for mediation between the program participant and the owner or person(s) with whom the program participant is living, provided that the mediation is necessary to prevent the program participant from losing permanent housing in which the program participant currently resides.

(O) Credit repair: funds may pay for credit counseling and other services necessary to assist program participants with critical skills related to household budgeting, managing money, accessing a free personal credit report, and resolving personal credit problems. This assistance does not include the payment or modification of a debt.

(P) Landlord/Tenant Liaison: Costs of liaison services between property managers/owners and program participants are eligible costs and may include:

- Landlord outreach;
- Physical inspections and rent reasonable studies as needed to secure units;
- Rental application fees and security deposits for clients, in accordance with the financial assistance costs requirements in (R);
- Mediation services in (N) for housing issues that may arise between owner, property manager, or other residents and clients;
- Coordination or assistance with the provision of other eligible services to assist clients to maintain permanent housing.

(Q) Services for special populations: funds may be used to provide services for special populations, such as victim services, so long as the costs of providing these services are eligible under this section. The term victim services means services that assist program participants who are victims of domestic violence, dating violence, sexual assault, stalking, or human trafficking including services offered by rape crisis centers and domestic violence shelters, and other organizations with a documented history of effective work concerning domestic violence, dating violence, sexual assault, stalking, or human trafficking.

(R) Financial assistance costs: funds may be used to pay housing owners, utility companies, and other third parties for the following costs, as applicable:

- Rental application fees: Rental housing application fee that is charged by the owner to all applicants.
- Security deposits: A security deposit that is equal to no more than 2-months' rent. This assistance is separate and distinct from the provision of financial assistance for First and Last Month's rent provided under this section and cannot be used to duplicate those costs.
- Utility deposits: funds may pay for a standard utility deposit or initiation fee required by the utility company or owner (if owner-paid utilities are provided) for all program participants for the following utilities:
 - Gas
 - Electric
 - Water
 - Sewer
- Moving costs: funds may pay for moving costs, such as truck rental or hiring a moving company. This assistance may include payment of temporary storage fees for up to 3 months, provided that the fees are accrued after the date the program participant begins receiving assistance under this section of the Notice and before the program participant moves into permanent housing. Payment of temporary storage fees in arrears is not eligible.

Program Administration

Eligible administrative costs include:

- (A) Payroll costs, which are gross salaries and wages paid to employees assigned to the project, including payroll taxes, employee compensation, and employee benefits;
- (B) Employee education, training, and associated travel;
- (C) General administrative costs which are costs for goods and services including supplies, legal charges, bank charges, utilities, telephone/internet services, insurance, and other administrative costs that are reasonable and customary for the general administration of the program for the qualifying populations.
- (D) Pro-rated staffing costs of a Resident Services Coordinator for qualifying households if such costs are not already paid by another source.

Operations and Maintenance

Operating costs must be reasonable and appropriate for the area, size, population(s) served, and type of project.

Eligible operating costs include:

- (A) Insurance;
- (B) Utilities;
- (C) Property taxes;
- (D) Maintenance of a unit/facility serving a qualifying household.

APPENDIX D, DEFINITIONS OF QUALIFYING POPULATIONS

Housing-Related Services projects will meet the definitions of the qualifying populations as defined by the :

A. Qualifying Populations

1. Senior Citizen, Elderly Person, as defined in 24 CFR 5.100:

An individual who is at least 62 years of age.

2. Persons with Disabilities as defined in 24 CFR 5.151:

An individual experiencing a physical, mental/behavioral impairment that substantially limits one or more major life activities of the individual, a record of such an impairment, or being regarded as having such an impairment.

3. Homeless, as defined in 24 CFR 91.5 Homeless (1), (2), or (3):

(1) An individual or family who lacks a fixed, regular, and adequate nighttime residence, meaning:

(i) An individual or family with a primary nighttime residence that is a public or private place not designed for or ordinarily used as a regular sleeping accommodation for human beings, including a car, park, abandoned building, bus or train station, airport, or camping ground;

(ii) An individual or family living in a supervised publicly or privately operated shelter designated to provide temporary living arrangements (including congregate shelters, transitional housing, and hotels and motels paid for by charitable organizations or by federal, state, or local government programs for low-income individuals); or

(iii) An individual who is exiting an institution where he or she resided for 90 days or less and who resided in an emergency shelter or place not meant for human habitation immediately before entering that institution;

(2) An individual or family who will imminently lose their primary nighttime residence, provided that:

(i) The primary nighttime residence will be lost within 14 days of the date of application for homeless assistance;

(ii) No subsequent residence has been identified; and

(iii) The individual or family lacks the resources or support networks, e.g., family, friends, faith-based or other social networks needed to obtain other permanent housing;

4. At risk of Homelessness, as defined in 24 CFR 91.5 At risk of homelessness:

(1) An individual or family who:

(i) Has an annual income below 30 percent of median family income for the area, as determined by HUD;

(ii) Does not have sufficient resources or support networks, e.g., family, friends, faith-based or other social networks, immediately available to prevent them from moving to an emergency shelter or another place described in paragraph (1) of the "Homeless" definition in this section; and

(iii) Meets one of the following conditions:

- (A) Has moved because of economic reasons two or more times during the 60 days immediately preceding the application for homelessness prevention assistance;
- (B) Is living in the home of another because of economic hardship;
- (C) Has been notified in writing that their right to occupy their current housing or living situation will be terminated within 21 days after the date of application for assistance;
- (D) Lives in a hotel or motel and the cost of the hotel or motel stay is not paid by charitable organizations or by federal, State, or local government programs for low-income individuals;
- (E) Lives in a single-room occupancy or efficiency apartment unit in which there reside more than two persons or lives in a larger housing unit in which there reside more than 1.5 people per room, as defined by the U.S. Census Bureau;
- (F) Is exiting a publicly funded institution, or system of care (such as a health-care facility, a mental health facility, foster care or other youth facility, or correction program or institution); or
- (G) Otherwise lives in housing that has characteristics associated with instability and an increased risk of homelessness, as identified in the recipient's approved consolidated plan;

5. Unaccompanied Homeless Youth or Young Adult

(1) Unaccompanied youth under 25 years of age, or families with children and youth, who do not otherwise qualify as homeless, but who:

- (i) Are defined as homeless under section 387 of the Runaway and Homeless Youth Act (42 U.S.C. 5732a), section 637 of the Head Start Act (42 U.S.C. 9832), section 41403 of the Violence Against Women Act of 1994 (42 U.S.C. 14043e-2), section 330(h) of the Public Health Service Act (42 U.S.C. 254b(h)), section 3 of the Food and Nutrition Act of 2008 (7 U.S.C. 2012), section 17(b) of the Child Nutrition Act of 1966 (42 U.S.C. 1786(b)), or section 725 of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11434a);
- (ii) Have not had a lease, ownership interest, or occupancy agreement in permanent housing at any time during the 60 days immediately preceding the date of application for homeless assistance;
- (iii) Have experienced persistent instability as measured by two moves or more during the 60-day period immediately preceding the date of applying for homeless assistance; and
- (iv) Can be expected to continue in such status for an extended period of time because of chronic disabilities, chronic physical health or mental health conditions, substance addiction, histories of domestic violence or childhood abuse (including neglect), the presence of a child or youth with a disability, or two or more barriers to employment, which include the lack of a high school degree or General Education Development (GED), illiteracy, low English proficiency, a history of incarceration or detention for criminal activity, and a history of unstable employment;

(2) A child or youth who does not qualify as “homeless”, but qualifies as “homeless” under section 387(3) of the Runaway and Homeless Youth Act (42 U.S.C. 5732a(3)), section 637(11) of the Head Start Act (42 U.S.C. 9832(11)), section 41403(6) of the Violence Against Women

Act of 1994 (42 U.S.C. 14043e-2(6)), section 330(h)(5)(A) of the Public Health Service Act (42 U.S.C. 254b(h)(5)(A)), section 3(l) of the Food and Nutrition Act of 2008 (7 U.S.C. 2012(l)), or section 17(b)(15) of the Child Nutrition Act of 1966 (42 U.S.C. 1786(b)(15)); or

(3) A child or youth who does not qualify as “homeless” but qualifies as “homeless” under section 725(2) of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11434a(2)), and the parent(s) or guardian(s) of that child or youth if living with her or him.

6. Domestic Violence Survivor, Fleeing, or Attempting to Flee, Domestic Violence, Dating Violence, Sexual Assault, Stalking, or Human Trafficking, as defined by HUD.

This population includes any individual or family who is fleeing, or is attempting to flee, domestic violence, dating violence, sexual assault, stalking, or human trafficking. This population includes cases where an individual or family reasonably believes that there is a threat of imminent harm from further violence due to dangerous or life-threatening conditions that relate to violence against the individual or a family member, including a child, that has either taken place within the individual’s or family’s primary nighttime residence or has made the individual or family afraid to return or remain within the same dwelling unit. In the case of sexual assault, this also includes cases where an individual reasonably believes there is a threat of imminent harm from further violence if the individual remains within the same dwelling unit that the individual is currently occupying, or the sexual assault occurred on the premises during the 90-day period preceding the date of the request for transfer.

Domestic violence, which is defined in 24 CFR 5.2003 includes felony or misdemeanor crimes of violence committed by:

- 1) A current or former spouse or intimate partner of the victim (the term “spouse or intimate partner of the victim” includes a person who is or has been in a social relationship of a romantic or intimate nature with the victim, as determined by the length of the relationship, the type of the relationship, and the frequency of interaction between the persons involved in the relationship);
- 2) A person with whom the victim shares a child in common;
- 3) A person who is cohabitating with or has cohabitated with the victim as a spouse or intimate partner;
- 4) A person similarly situated to a spouse of the victim under Spokane’s domestic or family violence laws; or
- 5) Any other person against an adult or youth victim who is protected from that person’s acts under the domestic or family violence laws of the jurisdiction.

Dating violence which is defined in 24 CFR 5.2003 means violence committed by a person:

- 1) Who is or has been in a social relationship of a romantic or intimate nature with the victim; and
- 2) Where the existence of such a relationship shall be determined based on a consideration of the following factors:
 - a. The length of the relationship;
 - b. The type of relationship; and
 - c. The frequency of interaction between the persons involved in the relationship.

Sexual assault which is defined in 24 CFR 5.2003 means any nonconsensual sexual act proscribed by Federal, Tribal, or State law, including when the victim lacks capacity to consent.

Stalking which is defined in 24 CFR 5.2003 means engaging in a course of conduct directed at a specific person that would cause a reasonable person to:

- 1) Fear for the person's individual safety or the safety of others; or
- 2) Suffer substantial emotional distress.

Human Trafficking includes both sex and labor trafficking, as outlined in the Trafficking Victims Protection Act of 2000 (TVPA), as amended (22 U.S.C. 7102).

These are defined as:

- 1) Sex trafficking means the recruitment, harboring, transportation, provision, obtaining, patronizing, or soliciting of a person for the purpose of a commercial sex act, in which the commercial sex act is induced by force, fraud, or coercion, or in which the person induced to perform such act has not attained 18 years of age; or
- 2) Labor trafficking means the recruitment, harboring, transportation, provision, or obtaining of a person for labor or services, through the use of force, fraud, or coercion for the purpose of subjection to involuntary servitude, peonage, debt bondage, or slavery.

7. **Veterans and Families** that include a Veteran Family Member that meet the criteria for one of the qualifying populations described above are eligible to receive Housing-Related Services program assistance.

8. **HOME-ARP ONLY - Other Populations**

Where providing supportive services or assistance under section 212(a) of NAHA (42 U.S.C. 12742(a)) would prevent the family's homelessness or would serve those with the greatest risk of housing instability. HUD defines these populations as individuals and households who do not qualify under any of the populations above but meet one of the following criteria:

(1) Other Families Requiring Services or Housing Assistance to Prevent Homelessness is defined as households (i.e., individuals and families) who have previously been qualified as "homeless" as defined in 24 CFR 91.5, are currently housed due to temporary or emergency assistance, including financial assistance, services, temporary rental assistance or some type of other assistance to allow the household to be housed, and who need additional housing assistance or supportive services to avoid a return to homelessness.

(2) At Greatest Risk of Housing Instability is defined as household who meets either paragraph (i) or (ii) below:

- (i) has annual income that is less than or equal to 30% of the area median income, as determined by HUD and is experiencing severe cost burden (i.e., is paying more than 50% of monthly household income toward housing costs);
- (ii) has annual income that is less than or equal to 50% of the area median income, as determined by HUD, AND meets one of the following conditions

from paragraph (iii) of the “At risk of homelessness” definition established at 24 CFR 91.5:

- (A) Has moved because of economic reasons two or more times during the 60 days immediately preceding the application for homelessness prevention assistance;
- (B) Is living in the home of another because of economic hardship;
- (C) Has been notified in writing that their right to occupy their current housing or living situation will be terminated within 21 days after the date of application for assistance;
- (D) Lives in a hotel or motel and the cost of the hotel or motel stay is not paid by charitable organizations or by Federal, State, or local government programs for low-income individuals;
- (E) Lives in a single-room occupancy or efficiency apartment unit in which there reside more than two persons or lives in a larger housing unit in which there reside more than 1.5 persons reside per room, as defined by the U.S. Census Bureau;
- (F) Is exiting a publicly funded institution, or system of care (such as a health-care facility, a mental health facility, foster care or other youth facility, or correction program or institution); or
- (G) Otherwise lives in housing that has characteristics associated with instability and an increased risk of homelessness, as identified in the recipient's approved consolidated plan

