

City of Spokane Encampment Resolution Program (ERP) Local Guidelines

Effective Date: November 1, 2025

Authority: ESSB 5693, §132; Washington State Department of Commerce Encampment Resolution Program (ERP) Guidelines (2025); Consolidated Homeless Grant (CHG) Guidelines, SFY 2026–2027; CHHS Flex Funding Policy (2025)

1. Purpose and Legislative Authority

These Local ERP Program Guidelines provide direction for administering encampment resolution efforts on or adjacent to state- and city- owned rights-of-way (ROW). They operationalize ESSB 5693 §132, which established a targeted grant program to transition people living on public ROW into safer, primarily *permanent housing solutions*.

ERP guidance supersedes CHG provisions where conflicts arise.

2. Program Overview

The Encampment Resolution Program (ERP) is a site-specific, time-limited initiative connecting residents of identified encampments to stable housing. The Local ERP extends ERP principles to local jurisdictions.

2.1 Goals

- Resolve encampments safely and humanely
- Prioritize permanent, service-supported housing
- Ensure measurable outcomes and transparent reporting
- Maintain compliance with ERP’s low-barrier, trauma-informed, and Housing First standards

2.2 Core Principles

- **Site-specific:** Services begin with City approval of a specific encampment
 - **Temporary in scope:** Engagement ends once the site is closed, and residents are housed or disengaged
 - **Coordinated:** Requires collaboration with Commerce, City, and local partners
 - **Outcome-driven:** Progress measured at 60-day intervals and six-/twelve-month post-housing points
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3. Eligible Interventions

ERP funding supports four categories of housing and outreach activity.

3.1 Emergency Shelter Beds

- Provides short-term temporary lodging for encampment residents
- Must operate as a continuous-stay shelter
- Must be low-barrier (no sobriety, income, or criminal history exclusions)
- **Rental Assistance:**
 - › Eligible for *either* (1) *deposit-only* type rental assistance through ERP *or* (2) Coordinated Entry (CE) enrollment for a Rapid Rehousing project—but not both

- › Deposit Policy: If deposit assistance is paid from ERP funds, the deposit follows the household upon move-out to a new unit, ensuring housing continuity

3.2 Temporary Beds

- Includes transitional or bridge housing for up to 24 months (depending on funding availability)
- Must be tied directly to an encampment resolution effort and referred directly by an ERP Emergency Bed provider
- Provides case management and navigation toward permanent housing
- **Rental Assistance:**
 - › Eligible for *either* (1) *deposit-only* type rental assistance through ERP *or* (2) Coordinated Entry (CE) enrollment for a Rapid Rehousing project—but not both
 - › Deposit Policy: If deposit assistance is paid from ERP funds, the deposit follows the household upon move-out to a new unit, ensuring housing continuity

3.3 Permanent Housing with Services

- Supportive services must be voluntary and person-centered
- Housing options must represent a meaningful improvement over encampment conditions
- **Rental Subsidy Requirements:**
 - › Must use Fair Market Rent (FMR) or lower, per HUD standards
 - › Cannot charge a flat fee or include case management in rent
 - › Deposit Policy: If deposit assistance is paid from ERP funds, the deposit follows the household upon move-out to a new unit, ensuring housing continuity
- Programs must report 6- and 12-month housing outcomes

3.4 Outreach and Identification

- Outreach must maintain a by-names list for each site
- Engagement begins only after coordination with and approval by the City
- Must employ trauma-informed and culturally responsive practices
- Outreach may provide snacks or bottled water per food reimbursement policy (Appendix A)
- Must document all contacts, engagement, offers, and outcomes in HMIS

4. Participant Eligibility

4.1 Eligibility Criteria

- Verified presence at a designated ROW encampment through the by-names list
- Continued presence or active engagement during resolution
- Eligible for housing, rental, or service supports only while associated with the specific site

4.2 Ineligibility

- Individuals who leave voluntarily prior to housing offer are no longer eligible for that site's assistance
- Participants who decline or are exited from housing cannot re-engage under that resolution
- Re-eligibility occurs only if re-identified at a new approved encampment

4.3 Household Composition

- Only individuals identified at the encampment are eligible
- Partners or family members not originally listed on the By-Names List are ineligible, except for reunification of a minor child when it supports stability and safety

4.4 Engagement Window

The *engagement window* defines the active period during which outreach, case management, and housing activities occur for a specific encampment resolution effort.

- The window opens upon the City's approval of the encampment site and establishment of a by-names list
- To be placed on the by-names list an individual must be on site when the assessment begins, no individual joining the site post the assessment phase is eligible for the by-names list.
- Only individuals verified on the by-names list during this engagement window are eligible for ERP-funded services, housing, or financial assistance

4.5 ERP Exit and Re-Enrollment

Households served under ERP are eligible for services only while actively engaged through an approved encampment resolution effort. Once a household has exited from ERP services—whether by program completion, voluntary disengagement, or denial of housing options—eligibility for re-enrollment under that encampment's ERP authorization ends permanently.

Re-enrollment is not permitted under the same encampment resolution effort, even if the household re-engages within 30 days or following behavior-related interventions. A household may only regain ERP eligibility if it is later verified as residing at a new, approved public right-of-way encampment site under a separate ERP authorization.

4.6 Permanent Housing Placement

Permanent housing placements depend on the units or beds that are available at the time of referral. Providers should follow an availability-based placement approach rather than placing households based on preference when doing so would skip over the next available unit.

4.7 Domestic Violence Transfer Plan

All providers must have a Domestic Violence (DV) transfer plan in place to support safe and timely moves when a client's safety requires relocation. This should include steps for internal transfers, external referral options, and required documentation.

4.8 Exceptions through Case Conferencing

If a household has a disability, accessibility need, or other documented circumstance that requires a specific type of unit, providers may bring the case forward through case conferencing to request an exception to the availability-based process. Exceptions should only be made through this collaborative review and agreement.

5. Reporting

5.1 Required Reporting and Performance Data

Grantees must collect and report program data consistent with Commerce and City requirements. Reporting ensures accountability, transparency, and alignment with statewide goals to reduce unsheltered homelessness.

5.2 Reporting Requirements:

- Submit outcome data at least every 60 days, including:
 - › Housing options offered, accepted, or declined
 - › Assistance provided and benefits enrolled
 - › Housing outcomes at six (6) and twelve (12) months post-placement

5.3 Performance Data Standards:

- Performance standards follow the *Five-Year Strategic Plan to Prevent and End Homelessness* and the *Performance Management Plan (PMP)*
- If a project type is not included in the PMP, the Grantee and City will jointly determine the closest applicable data standard

5.4 Data Quality and Compliance:

- Enter data promptly and accurately in HMIS
- Submit Monthly Data Quality Reports (MDQR) by the 10th of each month
- Maintain data completeness and accuracy consistent with PMP expectations
- Participate in performance review or corrective actions when requested

6. Fiscal and Compliance Requirements

Grantees must retain documentation of all expenditures made with ERP funds. The following are allowable expenses within each budget category:

6.1 Rent Assistance

- Monthly rent and combinations of first and last month's rent (paid one month at a time)
- Rental arrears and associated late fees if needed to obtain or maintain housing (no time limit)
- Lot rent for manufactured home or RV spaces
- Parking spaces connected to a unit
- Landlord incentives or reimbursement for damages
- Security deposits for new units
- Hotel/motel stays when no shelter is available or used as permanent housing
- Utilities included in rent or utility payments for households also receiving rent assistance
- Utility arrears and deposits (not time-limited)
- Application, background, or credit check fees; drug testing fees when required for housing
- Rental insurance required by lease
- Costs approved by Commerce (*must be approved in writing, in advance*)
- Special circumstances: global/master leases; temporary absences; subsidized housing move-in costs (security, first/last month's rent, arrears)

All assistance provided to clients under the Rent Assistance subcategory must be entered in HMIS as an enrollment service associated with the client record, including the dollar amount.

6.2 Facility Support

- Lease or rent for buildings used for temporary or permanent housing
- Hotel/motel costs for temporary housing

- Move-in costs for permanent housing (security, first/last month's rent)
- Utilities (gas, electricity, phone, internet, water/sewer, garbage)
- Maintenance materials, pest control, janitorial supplies, and staff/contract maintenance labor and mileage
- Security and janitorial salaries and benefits
- Essential equipment and supplies (bedding, mats, towels, toiletries, microwaves, pet items)
- Transportation directly related to household transport (bus tokens, shelter-van fuel)
- On-site/off-site building management costs
- Facility-specific insurance and accounting
- Application/background/credit checks and utility deposits for tenants
- Other Commerce-approved costs (*must be approved in writing, in advance*)
- Ineligible: reserves, debt service, construction/rehab, combined rent + facility support, mortgage/property taxes

6.3 Operations

- Salaries and benefits (including overtime/bonus) for program, IT, HR, accounting staff
- Office space, utilities, supplies, phone, internet
- Staff training, conferences, and related travel per OFM travel rules
- Outreach or community-event supplies; bottled water or packaged snacks for engagement
- One-time equipment purchases ≤ \$5,000 unless pre-approved
- Homeless system costs (PIT counts, data warehouse/HMIS, landlord outreach, CoC participation)
- Program activities: intake/assessment, housing stability planning, housing search and placement, landlord mediation, outreach, case management, data entry, general liability/auto insurance
- Other Commerce-approved expenses (*must be approved in writing, in advance*)
- Flexible Funding: limited assistance to support housing stability or essential household needs (e.g., car repair, safety items, training, hygiene products, transportation passes)
 - › See Appendix B – Flex Funding Policy
 - › Housing Stability assistance provided to clients under the Flex Funding subcategory must be entered in HMIS as an enrollment service associated with the client record, including the dollar amount.

6.4 Administration

- Executive director salary and benefits
- Organization-wide insurance
- Third-party financial reviews or audits (recommended every 24 months)
- Board expenses
- Membership fees and dues
- Agency facility costs (rent, depreciation, operations, maintenance for admin space)
- Indirect costs consistent with 2 CFR Part 200
- Cap: up to 15 % of total budget for lead and subgrantees

6.4 Food Expense Documentation

Only light snacks and bottled water during outreach or prepared meals for ERP participants are reimbursable. Providers must retain documentation and enter meals as services in HMIS, including unit cost. See Food Invoicing Detail Report (Appendix A).

6.5 Prohibited Activities

- Dual funding (e.g., using both ERP and CE enrollment with housing financial assistance for the same client)
 - Cash or cash-equivalent instruments (gift cards, prepaid cards, etc.)
 - Restaurant meals or groceries unless part of approved prepared-meal service for participants
 - Meals for staff or volunteers
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7. Waivers and Exceptions

CHHS may authorize waivers when adherence jeopardizes safety or program success.

Common examples:

- Service unavailability (e.g., meal vendor or outreach staff shortage)
- Temporary health or safety emergencies
- Participant-specific needs requiring flexibility

Requests must be submitted in writing with justification, proposed duration, and mitigation plan.

8. Alignment with CHG Principles

ERP remains grounded in CHG’s statewide homeless system principles:

- Housing First and low-barrier practices
 - Equity and inclusion, particularly for communities disproportionately affected by homelessness
 - Voluntary participation in services
 - HMIS data quality and transparency
 - Collaboration with Coordinated Entry and local crisis response systems
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9. Monitoring and Evaluation

- Local subrecipients are subject to monitoring by CHHS for fiscal, programmatic, and equity compliance
 - Monitoring may include file reviews, financial audits, and on-site or virtual visits
 - Findings may result in corrective action or adjustments in future funding allocations
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Appendix A – Sample Food Invoicing Template

Date	Site	# Particip.	Food Type	Unit Cost	Total	Vendor	Notes
07/10/25	I-90 Corridor Encamp.	15	Bottled water & snacks	\$2.00	\$30.00	ABC Outreach	Outreach engagement
07/20/25	XY Shelter	10	Prepared meal service	\$8.00	\$80.00	MealsNow LLC	ERP participants only

Certification:

I certify these expenses were incurred solely for ERP-eligible participants per ERP food reimbursement policy.

Signature: _____ Date: _____

Appendix B – Flex Funding Policy Summary

B.1 Purpose

Flexible funds provide short-term assistance for expenses that directly support housing stability when no other funding is available. Flex Funding is an allowable subcategory within an Operations budget category.

The Flex Funding Policy is summarized below for reference. Subgrantees must adhere to the full policy: [2025 Final Flex Funding P&P.pdf](#)

B.2 Allowable Uses

- Essential household goods and furnishings
- Transportation passes, identification fees, pet deposits, or storage costs
- Employment-related or documentation fees directly tied to housing access

B.3 Conditions

- Payments made directly to vendors, not to clients
- Must be tied to a verified housing stability plan or encampment resolution effort
- Must be time-limited and non-recurring
- Document justification, receipts, and third-party verification
- May not duplicate other benefits or covered CHG/ERP expenses

B.4 Excluded Uses

- ERP does not permit gift cards, cash, or cash equivalents of any kind
- Housing subsidy already eligible under Rent Assistance
- Ongoing bills or subscriptions
- Entertainment or non-housing-related purchases

B.5 Exception to Rule

Under extraordinary circumstances, local administrators may request an exception when:

- No other funding is available to prevent loss of housing or achieve stability
- The request does not conflict with federal or state statute

Requests must follow the **CHHS Exception to Rule Process** (see Flex Funding P&P, June 2025) and include documentation of justification and approval.

Policy: [2025 Final Flex Funding P&P.pdf](#)