



Community, Housing and Human Services Department

Consolidated Homeless Housing Grant Program Guidelines

Funded through:

Washington State Department of Commerce Consolidated Homeless Grant

City of Spokane Homeless Housing Assistance Act Funds

City of Spokane Emergency Solutions Grant

January 2014

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1 Overview

The Consolidated Homeless Grant (CHHGP) combines state homeless resources into a single grant opportunity for county governments and other designated entities under the administration of the Washington State Department of Commerce (Commerce). The CHHGP is designed to support an integrated system of housing assistance to prevent homelessness and secure permanent housing for households who are unsheltered or in temporary housing. This grant provides resources to address the housing needs of people who are homeless or at-risk of homelessness, as described in local plans to end homelessness.

1.1 Fund Sources

Washington State Department of Commerce: Consolidated Homeless Grant, City of Spokane Homeless Housing Assistance Act Funds, City of Spokane Emergency Solutions Grant.

1.2 Grant Activities

CHHGP funds support a variety of activities, including operation of time-limited housing units, rental assistance, permanent supportive housing support services, and data collection and reporting.

1.3 Purpose

The purpose of the *Guidelines* is to:

- ✓ Establish the administrative and system requirements for Sub Grantees.
- ✓ Serve as a reference to Sub Grantees on topics to include (but not limited to) requirements for local homeless plans, monitoring, and data directives.
- ✓ Provide detail on household eligibility;
- ✓ Outline the allowable activities for Sub Grantees; and
- ✓ Provide standards for documenting services and ensuring compliance.

2 Required homeless management information system (HMIS) Entry

All Sub Grantees must use HMIS for data collection and reporting purposes. Data must be collected in accordance with the Agency Partner HMIS Agreement (see [Appendix A: Agency Partner HMIS Agreement](#)).

3 Sub Grantee Selection and Monitoring

The City of Spokane will monitor Sub Grantees CHHGP grant activities. Sub Grantees will be given a minimum of 30 days' notice unless there are special circumstances that require immediate attention. Specific details of what will be reviewed and what

materials the Sub Grantee will be required to submit will be outlined in the 30-day notice.

3.1 Sub Grantee Monitoring

1. The City of Spokane Community, Housing and Human Services department will conduct a risk assessment of Sub Grantees (at a minimum of every two years) and develop a monitoring schedule accordingly.
2. All Sub Grantees are monitored for compliance with eligible activities, program objectives, equal opportunity, financial management and project performance requirements.
3. Monitoring of Sub Grantees may consist of on-site or remote techniques, or a combination thereof based on results of the risk assessment.

The monitoring may include:

- Project performance, including program objectives, eligible activities and benchmarks
- Financial management, including eligibility of costs
- HMIS participation and data quality
- Housing activities
- Audit Review

4. Community, Housing and Human Services Staff will provide the results of the visit in the form of an official written monitoring response that will be sent to the authorized agency official within 30 days of the monitoring visit. A copy of the letter may also be provided to the Spokane Regional Homeless Governance Council and to the chairperson of the Sub Grantees governing board as deemed necessary
5. If concerns or findings are identified during the monitoring visit that require corrective action, the City will require a time frame that the actions must be completed by, usually thirty (30) days. If the target date for corrective action is not met, a written request for response will be sent to the agency. If the agency does not sufficiently respond, further payments will be withheld until corrective action is resolved. If corrective actions are determined to be unacceptable, payments will continue to be held and further enforcement actions may be initiated.

4 Billing Procedures and Financial Records

Invoices shall be signed by the agency's representative authorized to sign requests for reimbursement and submitted on the City of Spokane Community, Housing and Human Services Department CHHGP billing form with appropriate backup documentation attached. See details under 'Program Costs' and 'Staff Costs' below. All billings shall be submitted to the Community, Housing and Human Services Department by the 10th of the month following actual expenditures, except for the month of July, when billings for June expenditures must be received by the 8th of July.

Program Costs

All costs submitted for reimbursement shall be in accordance with *Consolidated Homeless Housing Grant Program Guidelines*, the application submitted to the department and the approved sub-grantee budget and logic model.

All costs, equaling the amount billed, shall be listed on the appropriate Expense Report Forms provided with the billing form by Human Services.

Support documentation clearly indicating the nature and amount of each cost shall be attached for each item.

Staff Costs

Staff hours and the corresponding amounts billed shall be summarized on a Staff Expense Form provided by Community, Housing and Human Services with the billing form and needs to document 100% of the employee's salary as well as each budget line or funding source billed.

Staff time sheets and paystubs shall be made available upon request and must clearly support the amounts billed to the grant.

Staff time sheets shall reflect actual times worked, not percentage computations.

Employees shall maintain timesheets showing actual time worked by activity (ie. Case Management) AND by funding source (name of the grant that will pay for that activity). Timesheets shall be signed and dated by the staff person and their supervisor. Timesheets shall clearly indicate which grant is being charged and the activity it is being charged for.

4.1 Back-up Documentation

The City of Spokane may require a Sub Grantee to submit detailed source documentation on charges per the grant budget categories (Administration, Data, Program Operations for Facility-Based Housing, Facility Support, Rent Assistance and Program Operations).

4.2 Budget Revisions

The approved CHHGP budget will be identified in the contract between the City and the sub-grantee. Expenses shall stay within the approved budget amounts listed in the contract and on the billing form.

Budget revisions may be made as long as caps on budget categories established by the Department of Commerce are maintained and PRIOR written approval from the Community, Housing and Human Services Director is obtained prior to billing.

Budget revisions shifting funds (in one or cumulative transfers) of more than 10 percent of the grant total across budget categories (for example *Rent Assistance to Facility Support*) will require an amendment of both the City’s contract with the Department of Commerce and the City’s contract with the sub-grantee.

These amendments must be in place before charges against the revision may occur.

5 Local Share

5.1 Base Funding

Sub Grantees must demonstrate a dollar for dollar share (match) for every base funding dollar granted by Commerce. The match is verified through the Annual Report and includes all non-CHHGP funds spent on strategies to reduce homelessness, including permanent supportive housing. The match funds are not required to be spent by the lead grantee, but must be spent in the same county in which the lead grantee operates.

Local share must be in cash, not in-kind. Local share may be from local homeless document recording fees or the cash equivalent of Housing Choice Vouchers dedicated to CHHGP eligible activities or any other homeless activity authorized by statute including permanent supportive housing. Commerce will accept local share regardless of whether they have been used to leverage federal funds or not.

Any non-local funds dedicated only to homeless programs (such as Shelter Plus Care, the Washington Families Fund, or VASH vouchers) cannot be used for local share.

5.2 Ending Family Homelessness Funding

In addition to the base funding match, Ending Family Homelessness (EFH) expenditures must be matched. (These funds are allocated as “Services for TANF Households Funding” in the application.) This match can be made with any local fund sources, including CHHGP base funding, federal funding such as ESG, and private funds, but must be used to serve TANF families within a rapid re-housing and progressive engagement program model. The match funds are not required to be spent by the lead grantee, but must be spent in the same county in which the lead grantee operates. For details see the EFH Match Certification on the [CHHGP website](#).

6 Confidentiality, Grievance, and Fraud

6.1 Confidentiality of Client Records

Sub Grantees must have policies and/or procedures that ensure client records are maintained in a confidential manner.

6.2 Termination of Participation, Applicant Denial, and Grievance

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

6.2.1 Termination of Participation and Grievance

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

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

6.2.2 Denial and Grievance

Causes of denial of assistance include, but are not limited to, the household's ineligibility or failure to provide verifiable evidence of eligibility, etc. Established procedures should describe:

- ✓ Circumstances in which a household may not qualify or would be denied;
- ✓ Notification of denial; and
- ✓ A household's right to review a Sub Grantee's decision.

6.3 Client Fraud

If CHHGP funds have been expended on behalf of ineligible clients or expenses due to client fraud, it is the Sub Grantee's responsibility to inform the City of Spokane and repay the funds.

7 Overview of Required Documentation

The following chart summarizes the documentation required in each client file, depending on the type of service provided. Details and specific information for each requirement are explained in the following sections. CHHGP Required Forms are found in [Appendix G: Consolidated Homeless Grant Required Forms](#).

		Household Eligibility Verification and Income Recertification Form & Supporting Documents								
		HMIS Consent Form	Homeless Status	Income	Eligible Children	Housing Stabilization Plan	Rent reasonableness	Executed Lease, or Rental Agreement (landlord) OR Certification of Payment Obligation (friend or family)	Landlord Certification or Housing inspection	Lead paint inspection
Homeless	Congregate Living Facility up to 24 months	✓								
	Single-household units, <90 days	✓				✓				
	Single-household units, ≥ 90 days and up to 24 months	✓	✓	✓	✓	✓			✓	✓
	Rent Assistance	✓	✓	✓	✓	✓	✓	✓	✓	✓
At Risk of Homelessness	Rent Assistance	✓	✓	✓	✓	✓	✓	✓		✓
Permanent Supportive Housing	Housing Stabilization	✓	✓	✓	✓	✓				

8 Overview of Eligible Expenses

The following chart summarizes the allowable CHHGP activities. Details and specific information for each activity are explained in the following sections.

	Allowable Activities					
	Rent Assistance*	Facility Support*	Program Operations*	Permanent Supportive Housing	Data Collection	Administration
Eligible Expenses:						
Household rent (including lot for RV or manufactured housing), utilities, deposits, arrears	✓	✓ (excludes arrears)				
Housing application fees	✓	✓	✓			
Parking spaces connected to unit	✓					
Background and credit checks, urinalyses costs	✓	✓	✓			
Moving costs	✓	✓				
Lease/rent on building		✓				
Utilities for facilities		✓				
Utilities for office			✓		✓	✓
Maintenance		✓				
Security and Janitorial services		✓				
Essential facility equipment		✓				
Client transportation costs		✓				
Hotel/Motel expenses less than 90 days	✓	✓				
Site management costs		✓				
Facility-specific insurance		✓				
Housing search and placement			✓			
Essential Needs (HEN Clients only)			✓			
Housing stability			✓			
Outreach			✓			
Inspections			✓			
Program-level client data collection and entry			✓	✓	✓	
Systems-level data analysis, evaluation, and planning					✓	
Salaries/benefits		✓	✓	✓	✓	✓
Office space, supplies, equipment, staff travel			✓	✓	✓	✓
General liability insurance			✓	✓		
Point-in-time counts			✓		✓	
Housing inventory			✓		✓	
Local homeless plans			✓		✓	✓
WSQA					✓	✓
Coordinated Entry planning/implementation/operation			✓		✓	✓
General organization administrative costs not attributed to a specific program						✓

9 Household Eligibility

9.1 Housing Status Eligibility

Sub Grantees need to first determine the *Housing Status* (homeless or at risk of becoming homeless) of households seeking assistance. For CHHGP purposes, a household is defined as 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 related or unrelated individuals who may be providing temporary housing for the household requesting services.

No housing status documentation is required if providing a bed night in a congregate living facility or program with a maximum length of stay of 90 days or less.

9.1.1 At Risk of Becoming Homeless

Households are considered at risk of homelessness if they will imminently lose their primary nighttime residence within 14 days of the date of application for assistance, including people facing eviction for non-payment of rent. Rent assistance to prevent homelessness must be targeted to those households at highest risk of becoming homeless.

9.1.2 Homeless

Households are considered homeless if they are unsheltered or are living in a temporary housing situation, as described below.

- ✓ A household who lacks a fixed, regular, and adequate nighttime residence, meaning:
 - A household with a primary nighttime residence that is 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; or
 - A household living in a temporary living arrangement, including congregate shelters, transitional housing, and hotels and motels paid for by charitable organizations or government programs.
- ✓ One or more household members who are exiting a system of care where (s)he has 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 **and** have no available housing options after exiting a
 - Psychiatric hospital or other psychiatric facility,
 - Substance abuse treatment facility or detox center,
 - Hospital (non-psychiatric),
 - Jail, prison, or juvenile detention facility, or
 - Foster care home or foster care group home.

- ✓ One or more household members who are fleeing, or are attempting to flee, domestic violence, dating violence, sexual assault, stalking, or other dangerous or life-threatening conditions that relate to violence against the household member(s), including children, that has 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.

9.2 Income Eligibility

The table below summarizes income limits for eligibility based on program/facility type, length of time in program, and population. Income limits are based on Area Median Income (AMI) which can be located for each county [here](#). For certain programs, there is no income eligibility requirement. Following the table is a more detailed account of income eligibility.

Program Type		Length of program	Population			
			HH w/ children	HH w/out children	HEN HH	EFH HH
Facility Support	Congregate living*	Up to 24 months	None	None	N/A	N/A
	Single-household units**	90 days or less (in a 12-month period)	None	None	N/A	N/A
	Single-household units**	More than 90 days (in a 12-month period) and up to 24 months	At or below 30% AMI	At or below 30% AMI	N/A	N/A
Rent Assistance	Literally Homeless	Up to 24 months	At or below 30% AMI	At or below 30% AMI	Enrollment: DSHS HEN Referral Recertification: DSHS HEN Referral and at or below 30% AMI	Enrollment and Recertification: TANF Enrollment
	At risk of homelessness	Up to 24 months	At or below 30% AMI	At or below 30% AMI	Enrollment: DSHS HEN Referral Recertification: DSHS HEN Referral and at or below 30% AMI	Enrollment and Recertification: TANF Enrollment
Permanent Supportive Housing	Homeless at program entry Meets Chronic Homeless Definition	Non time-limited	At or below 30% AMI	At or below 30% AMI	N/A	N/A

* Congregate living definition: a single room with multiple households.** Single –household unit definition: a house or apartment building with bedrooms for individual households and may share a kitchen, bathrooms, etc.

9.3 Recertification of Eligibility

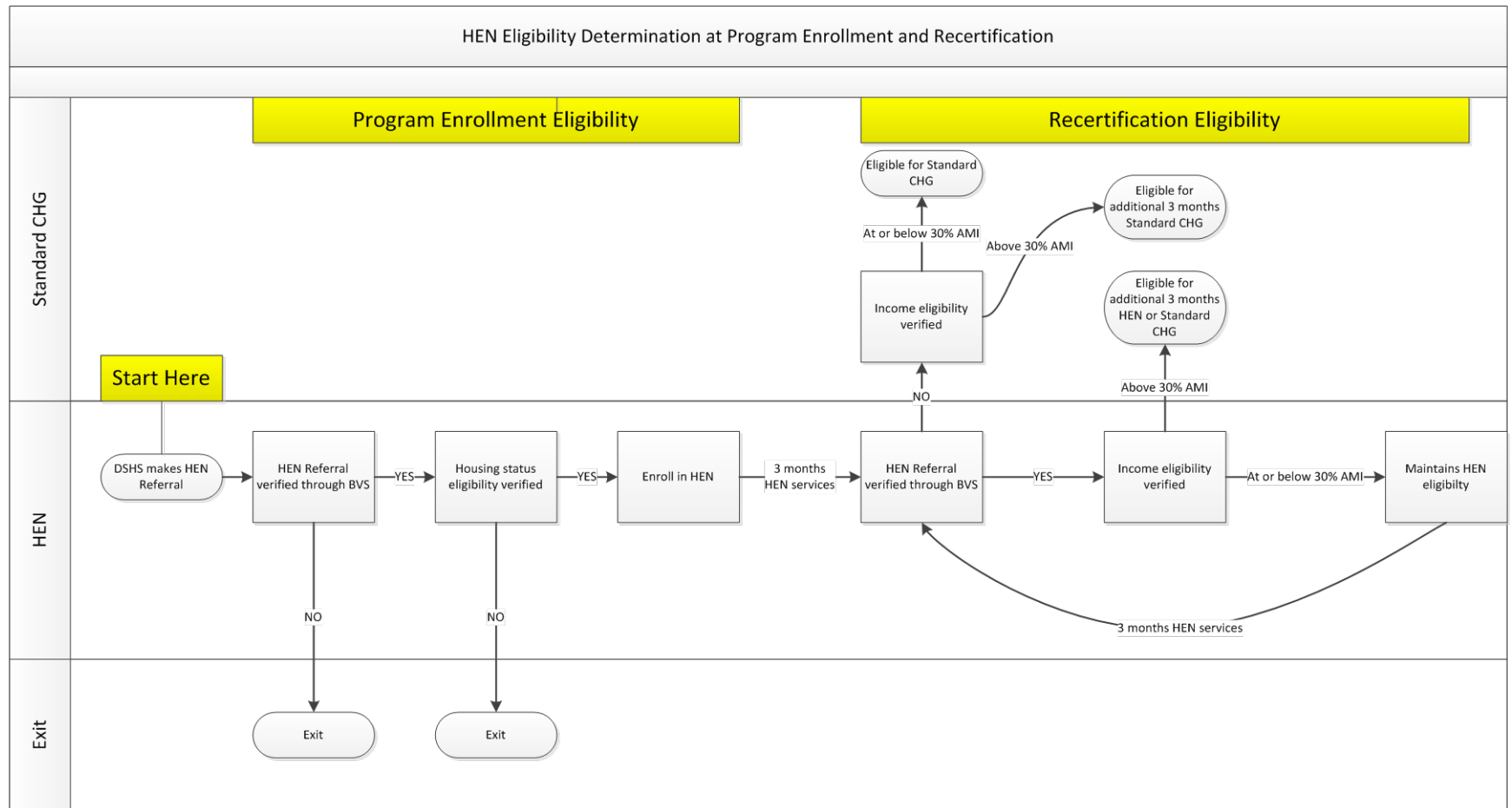
Household eligibility must be re-certified at least every three months or more frequently using the CHHGP Income Recertification form, which must be kept in the client file. Recertification must be addressed in the Sub Grantees CHHGP policies and/or procedures. Changes in income must be updated in HMIS at re-certification.

When households are determined over income, rent assistance can be extended for up to an additional 3 months and case management can continue for up to an additional 6 months to support households transition to self-sufficiency.

If the household is no longer eligible for the HEN program, the 3 additional months of rent assistance cannot be charged to HEN but may be charged to the Standard CHHGP program budget.

If the household is no longer eligible for the EFH program, the 3 additional months of rent assistance can be charged to the EFH or the Standard CHHGP program budget.

9.4 Overview of HEN Eligibility Determination at Enrollment and Recertification



9.5 Eligibility for Households with Minor Children

Households with minor children include:

- ✓ Persons who are pregnant or have one or more children under the age of 18.
- ✓ Homeless families whose only children are at or over the age of 18 and under the age of 21 may qualify for assistance if:
 - The adult children are living with the applicant household, and
 - They can provide proof that the adult children are enrolled in high school or equivalent.
- ✓ Pregnant or parenting youth under the age of 18 may qualify as independent families if they are legally emancipated or reside in DSHS licensed or approved facilities.

Children temporarily absent from the home may be counted as household members. A household whose only children are temporarily absent from the home may participate in the program when there is a documented likelihood that a child will be returned to their custody.

9.6 Eligibility for EFH Funding

Households must be enrolled in TANF at program entry.

10 Documentation of Eligibility

Sub Grantees are responsible for verifying and documenting household eligibility prior to providing CHHGP-funded rent assistance for any length of stay, OR bed nights in a program with a maximum length of stay of greater than 90 days. The CHHGP Verification of Household Eligibility and Income Recertification form and associated documentation must be kept in the client file.

The City of Spokane allows various types of documentation, ranging from third party verification to applicant self-declaration. Minimum acceptable types of documentation vary depending on the type of income or particular housing status and circumstance being documented.

10.1 Documentation of Housing Status

Standards and procedures for documenting Housing Status are detailed in [Appendix D: Housing Status Documentation Standards](#).

10.2 Documentation of Income

Standards and procedures for documenting Income Eligibility are detailed in [Appendix E: Income Eligibility Documentation Standards](#). Income Inclusion and Exclusions are found in [Appendix F: Income Inclusions and Exclusions](#).

10.2.1 Income Definition

Income is money that is paid to, or on behalf of, the head of household or spouse (even if temporarily absent) or to any other household member. (Victims fleeing domestic violence do not have to report the abuser's income.) Income includes the current (not projected) gross income (annualized) of all adult (18 years and older) household members and unearned income attributable to a minor.

The definition of income reflects a household's income at the time they are seeking assistance. Accordingly, documents and information collected to verify income should be recent. Documentation dated within 30 days is acceptable. However, for public assistance benefits, (e.g., SSI, food stamps), a benefits statement received any time within the twelve months prior to the time of application and reflecting current benefits received by a household is allowed.

The [Consolidated Homeless Grant Verification Household Eligibility and Income Recertification](#), income documentation, and calculations must be kept in the client file.

10.2.2 Annualizing Wages and Periodic Payments

Use the [CHHGP 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. See [CHHGP Income Eligibility Worksheet Instructions](#). This provides an average wage per payment period. Depending on pay periods used by the employer or the schedule of periodic payments, 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

10.3 Age Documentation for Minor Children

When CHHGP funds are used for facility support (90 days up to 24 months) or rent assistance for households with minor children, children's ages must be documented. Section 4, Eligible Children Verification, of the [Consolidated Homeless Grant Verification Household Eligibility and Income Recertification](#) form must be completed and kept in the client file.

11 Program Operations for Rent Assistance and Facility Support

Operations are costs specifically attributed to case managers, outreach workers, and/or housing locators (and their supervisors); and other related personnel (such as shelter staff). This section contains requirements for progressive engagement, working with TANF-eligible households, and allowable expenses for program operations.

11.1 Coordinated Entry

All programs receiving CHHGP funds will participate in the City of Spokane Coordinated Assessment and Entry Programs.

Programs serving households with children will accept all new program participants through the Homeless Families Coordinated Assessment Program (HFCA).

Programs serving households without children will accept all new program participants through the Single Homeless Coordinated Assessment Program once it is implemented in the summer of 2014.

11.2 Progressive Engagement Approach to Services

Case managers and other staff working directly with households should employ the Progressive Engagement (PE) model. In a PE approach, client needs are met with the appropriate level of services, starting with the least intensive service and increasing service level as needed. The Initial assessment of strengths, needs and barriers to stable housing informs the development of a client-driven housing stability plan, which may include access to rent assistance and other services. However, it is not expected that the initial assessment will predict the total amount or duration of services needed. Frequent re-assessment informs updated stability plans and the provision of additional services as needed.

Examples of Progressive Services for Rent Assistance Programs

Light services (for many households): share lists of landlords; pay a deposit; provide information on community resources.

Medium services (for few households): assist with landlord search and negotiation; make a referral to specific community resources to meet identified needs; pay one to three months' rent subsidy.

Heavy services (for very few households): provide landlord incentives and on-going risk mitigation; continue rent subsidy month by month until household is able to pay rent on their own; meet with other providers to coordinate service plans.

Once exited from the housing program, households should be allowed to return to the homeless system if they become homeless or at

Why Progressive Engagement?

- It is very difficult to predict how much assistance a household will ultimately need based on the initial assessment.
- The majority of households only need a little help to end or prevent an episode of homelessness.
- Matching services with household needs is cost-effective, and reserves the most intensive services for households with highest needs.

homelessness in the future. Data shows that most households will maintain housing stability on their own but some will need additional assistance.

Services and housing options provided are tailored to household needs and priorities, as much as possible. The household's transition to self-sufficiency is supported through

connections to mainstream service providers, such as DSHS/WorkFirst, WorkSource, the Veteran's Administration, and the Social Security Administration. The core principles of PE can be applied to both facility-based and rent assistance programs, and can effectively serve a range of client needs.

Additional Resources for Progressive Engagement

- ✓ [Progressive Engagement](#) (United States Interagency Council on Homelessness)
- ✓ [Rapid Rehousing: A progressive engagement approach to subsidy and services](#) (Kathy Barkow, Aspire Consulting LLC)
- ✓ [Progressive Engagement](#) (Suzanne Wagner, Housing Innovations)

11.3 Requirements for TANF-Eligible Households

Homeless families identified in shelter that are likely to be TANF-eligible, but are not currently on TANF, should be referred to their local Community Services Office or instructed to complete an on-line application (<https://www.washingtonconnection.org/home/>) within 2 business days of shelter enrollment.

For already identified TANF families in a rent assistance program, Sub Grantees should actively participate with DSHS WorkFirst program specialists and employment partners to assist households in ending their homelessness and becoming self-sufficient.

11.4 Allowable Expenses

Allowable expenses include those specifically related to the CHHGP:

- ✓ Housing Stability. Includes activities for the arrangement, coordination, monitoring, and delivery of services related to meeting the housing needs of households and helping them obtain housing stability. Services and activities may include developing, securing, and coordinating services including:
 - SSI/SSDI through [SSI/SSDI Outreach, Access, and Recovery \(SOAR\)](#)
 - [Affordable Care Act](#) activities that are specifically linked to the households stability plan;
 - Case management activities related to accessing Work Source employment services;
 - Monitoring and evaluating household progress;
 - Assuring that households' rights are protected; and
 - Developing an individualized housing and service plan, including a path to permanent housing stability subsequent to assistance.
- ✓ Housing search and placement. Includes services or activities designed to assist households in locating, obtaining, and retaining suitable housing. Services or activities may include: tenant counseling, assisting households to understand leases, securing utilities, making moving arrangements, representative payee services concerning rent and utilities, and mediation and outreach to property owners related to locating or retaining housing.

- ✓ Outreach. Includes services or assistance designed to publicize the availability of programs to make persons who are homeless or almost homeless aware of these and other available services and programs. Not all households assessed will be eligible for assistance. Time spent assessing a household, whether or not deemed eligible, is an allowable expense under this activity.
- ✓ Inspections (see [Unit Habitability for Rent Assistance](#))
- ✓ Data collection and entry
- ✓ Salaries/benefits for program staff
- ✓ Salaries/benefits to monitor Sub Grantees (or can charge in Administration)
- ✓ Staff costs to issue rent assistance. This cost is not for case management activities, but is associated only with the appropriate portion of salary and benefits of the bookkeeper who issues checks to landlords, utility companies or paying hotel or motel bills on behalf of a household.
- ✓ Office space, utilities, supplies, equipment (up to \$1,000 per grant period unless approved in advance by the City of Spokane), telephone, internet, and training/conferences/travel/per diem
- ✓ General liability insurance and automobile insurance
- ✓ Other costs as approved in advance by the City of Spokane
- ✓

12 Rent Assistance

With a progressive engagement approach to services, the following cost-effective and data-driven housing solutions should be used.

12.1 Rapid Rehousing

Rapid Re-housing (RRH) quickly moves households from homelessness into permanent housing by providing temporary rent subsidies and housing-focused case management services. Permanent housing is defined as a unit where the household does not have to move out of after the subsidy ends. With RRH, people experience a reduced time being homeless while being connected to resources and support in their community.

12.2 Targeted Prevention

Targeted Prevention is an approach where households are strategically prioritized to receive homeless prevention assistance based on a standardized, evidence-based assessment that identifies households who are at highest risk of becoming homeless. Successful targeted prevention reduces the number of households who actually become homeless.

12.3 Assessment and Housing Stability Plan

An assessment must be completed for each household.

For all homeless households, initial assessment must address immediate barriers to obtaining housing (income, criminal history, credit/rental history). In addition households access to other resources for housing, financial and mainstream services should be addressed in the initial assessment. The initial assessment must document that all other housing options, financial resources and assistance from family and friends has been explored and is not an option for the household.

For all rent assistance households (whether homeless or at risk), assessment must address barriers to maintaining housing stability (e.g. ability to pay rent, ability to follow lease).

The assessment must inform a plan which outlines the amount and duration of rent subsidy, needed services and referrals, and goals and action steps leading to housing stability. The plan should be developed collaboratively with the household. The assessment and plan, including completion dates of action steps, must be documented in the client file. See [Appendix I: Overview of Needs Assessment and Stability Plan Elements](#).

Targeted Prevention

Most people do not become homeless, even if:

- They live in poverty
- They get an eviction notice
- They pay > 30% of their income toward rent

Evidence-based predictors of homelessness include:

- Past homelessness
- Head-of-household is under 30
- Pregnant or parenting at least once child 0-6 years old
- Extremely low income (at or below 15% AMI)
- High rent burden (greater than 65% of income)

Preventing Homelessness with CHHGP

- Rent assistance must be targeted to those at highest risk of becoming homeless
- Households must be at or below 30% AMI
- Solve the immediate housing crisis and address barriers to on-going housing stability
- Provide just enough assistance and make it easy to come back if more is needed

12.4 Determining a Household's Share of Rent and Utilities

A household's share of rent and utilities must be based on a percentage of income or a percentage of rent. Program policies must identify the method of rent share determination and rent share calculations must be documented in each client file.

The household's share of rent and utilities should increase when the household has reached specific goals or in "steps" based upon a timeline, until in most cases, the household assumes full responsibility for monthly housing costs. If the increase is in "steps" the steps must clear, be documented in the client file and act as benchmarks for increasing household responsibility for rent.

The exact amount a household can afford should be determined collaboratively with the household as part of the assessment and planning, and may be adjusted over time as necessary. Families may pay more than the traditional 30% of income towards rent and utilities.

For HEN households, income will not increase while enrolled in the HEN program, therefore it is not expected that the rent subsidy will decrease. In addition to immediate housing stability, a stability plan should address maintaining housing when the HEN subsidy ends.

Maintaining Homeless Status for Permanent Housing

A household that is receiving Rapid Re-Housing assistance is considered homeless for purposes of remaining eligible for other permanent housing placements, during the time period that they are receiving the Rapid Re-Housing assistance. Rapid Re-Housing is a model for helping homeless individuals and families obtain and maintain permanent housing, and may be appropriate to use as a bridge to other permanent housing programs.

It is important to note that although the housing itself is still considered permanent housing; therefore, the household receiving Rapid Re-Housing assistance is not considered homeless for counting purposes and therefore must not be included in the Continuum of Care's sheltered point-in-time count.

12.5 Rent Policies and/or Procedures

Sub Grantee CHHGP policies and/or procedures *for rent assistance* must include, at a minimum:

- ✓ A clear description of the process for determining rent subsidy and household's share of rent and utilities.
- ✓ A written policy that specifies whether utility/rent deposits should be returned to the household or to the agency. If deposits are returned to the agency a written procedure for recording the return as program income is also required.
- ✓ Any requirement for households to report changes in income prior to recertification and how changes in income will impact tenant rent share.

12.6 Rent Subsidies Paid to a Landlord – Lease Requirements

A lease (or rent agreement) between the Sub Grantee and the landlord or the household and the landlord is required for rent subsidies paid to a landlord. The signed document must be kept in the client file.

At a minimum, the lease or rent agreement must contain the following:

- ✓ Name of tenant
- ✓ Name of landlord
- ✓ Address of rental property
- ✓ Occupancy (who gets to live at the rental)
- ✓ Term of agreement (lease start and end date)
- ✓ Rent rate and date due
- ✓ Deposits (if any and what for/term)
- ✓ Signature of tenant/date
- ✓ Signature of landlord/date

12.7 Rent Subsidies Paid to a Friend or Family Member - Certification of Payment Obligation Requirements

A 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. The Certification of Payment Obligation form must be kept in the client file.

12.8 Rent Reasonableness

"Rent reasonableness" means the total rent charged for a unit must be reasonable in relation to the rents being charged for comparable units in the private unassisted market during the same time period. A Sub Grantee must determine and document rent reasonableness for all units for which CHHGP assistance (including arrears) is provided. This requirement applies when households move into new units or stay in the same unit, and must be completed before the subsidy is paid.

Rent reasonableness documentation from other homeless programs is allowable and must be kept in the client file.

Sub Grantees must establish rent reasonableness policies and/or procedures which includes the methodology for determination, documentation requirements, and strategies for addressing special circumstances.

See [Appendix J: Rent Reasonableness Documentation Standards](#) for sample *forms* and specific information on how to document Rent Reasonableness.

12.9 Rent Limit/Payment Standard

In conjunction with determining rent reasonableness, the Sub Grantee must set an appropriate rent limit/payment standard for their jurisdiction, and describe it in the local program policies and procedures. Rent reasonableness helps determine the market rate, and the rent limit sets a limit for what will be paid. The standard represents the rent plus utility costs of moderately priced units by unit size (number of bedrooms).

[HUD's Fair Market Rent \(FMR\)](#) is the most commonly used rent limit guideline. A Sub Grantee may set a different limit using their own knowledge of market conditions or in consultation with the local housing authority which has valuable information about the relationship between actual market rents and the published FMRs. For example, you may set your rent limit as a percentage of FMR (100%, 110%, 120%, etc.)

Sub Grantees must establish policies and procedures for rare circumstances when exceptions may be made to the rent limit standards. Documentation in the client file must include:

- ✓ A description of the circumstances necessitating rental of the particular unit, including why a lower cost unit is unavailable to the household;

- ✓ A description of efforts to negotiate a lower rent amount with the landlord;
- ✓ Supervisor signature approving the rent amount.

12.10 Unit Habitability for Rent Assistance

12.10.1 Landlord Habitability Standards Certification

The [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. Failure to comply with the law may result in termination of the rent subsidy. Certification forms are required for all housing units that households will be moving into and must be kept in each client file.

- ✓ The Landlord Habitability Standards Certification must be completed before the rental subsidy is paid.
- ✓ The Certification is valid for the length of time the household is a tenant at the rental address.
- ✓ If the rental unit is provided to a different household within 12 months of the Certification being signed by the landlord, an additional Certification from the landlord is not required.

Sub Grantees must have procedures that address the following:

- ✓ Ensuring households can report concerns regarding their unit's safety and habitability and still maintain eligibility for housing assistance.
- ✓ Inspecting units when a household reports concerns about their unit's safety and habitability by using the Housing Habitability Standards (HHS) form, or Housing Quality Standards (HQS) form or documenting the specific complaint in an alternate format that includes follow-up and resolution.
- ✓ Inspecting units when renting to landlords who have had previous complaints made about their units OR inspecting a random number of units each calendar year.

12.10.2 Inspections

In lieu of (or in addition to) the above landlord certification model, a Sub Grantees may choose to inspect all housing units that households will be moving into. Inspection forms must be kept in the client file.

- ✓ The unit must pass inspection before the subsidy is paid.
- ✓ Inspections less than 12 months old performed by the same or other housing providers can be used.

- ✓ Sub Grantees may use the Housing Habitability Standards (HHS) form or the HUD Housing Quality Standards (HQS) form. If HQS is adopted, inspectors must be certified.

Sub Grantees must have procedures that address the following:

- ✓ Ensuring households can report concerns regarding their unit's safety and habitability and still maintain eligibility for housing assistance.
- ✓ Inspecting units when a household reports concerns about their unit's safety and habitability by using the Housing Habitability Standards (HHS) form, or Housing Quality Standards (HQS) form or documenting the specific complaint in an alternate format including follow-up and resolution.

12.10.3 Lead-Based Paint Visual Assessments

To prevent lead-poisoning in young children, Sub Grantees 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 lead-based paint visual assessment must be completed for all units that meet the three following conditions:

1. The household moving into or remaining in their current unit is being assisted with CHHGP rent/utility assistance/facility support.
2. The unit was constructed prior to 1978.
3. A child under the age of six is or pregnant woman is or will be living in the unit.

A visual assessment must be conducted prior to providing CHHGP rent assistance to the unit and on an annual basis thereafter (as long as assistance is provided). Visual assessments must be conducted by a HUD-Certified Visual Assessor (see [Appendix K: Lead Based Paint Visual Assessment Requirements](#)), and must be documented on the HQS or HHS and maintained in the client file.

12.10.4 Exceptions to the Lead-Based Paint Visual Assessment Requirement

There are certain exceptions to the requirement. Visual assessments are not required under the following circumstances:

- ✓ It is a zero-bedroom or SRO-sized unit;
- ✓ 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 – obtain 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, Sub Grantees need to document them.

For a guide to compliance see [Appendix K: Lead Based Paint Visual Assessment Requirements](#).

12.10.5 Interested Landlord List

Clients seeking permanent housing who are offered rental assistance must be provided an interested landlord list as defined in [RCW 43.185C](#).

12.10.6 Washington Residential Landlord-Tenant Act

Households receiving rent assistance should be made aware of the Washington Residential Landlord Tenant Act, RCW 59.18 and be informed on how to use this law when problems arise.

For more information visit:

- ✓ Washington Law Help, housing page, tenant rights at www.washingtonlawhelp.com
- ✓ Washington State Bar Association, publications, consumer information pamphlets at <http://www.wsba.org/>

12.11 Allowable Expenses

- ✓ Monthly rent and utilities, and any combination of first and last months' rent for up to 24 months. Rent may only be paid one month at a time, although rental arrears, pro-rated rent, and last month's may be included with the first month's payment.
- ✓ Rental and/or utility arrears (see utility-only assistance below) for up to three months. Rental and/or utility arrears may be paid if the payment enables the household to remain in the housing unit for which the arrears are being paid or move to another unit. If funds are used to pay rental and/or utility arrears, arrears must be included in determining the total period of the household's rental assistance, which may not exceed 24 months.

In cases where an eviction cannot be prevented, rental and/or utility arrears can still be paid if it satisfies the grievance with the evicting landlord and thereby allows the household to obtain different housing. Note that rental/utility 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.

- ✓ Utility-only assistance (including arrears) can be provided under very limited circumstances and must be documented using the CHHGP Utility Assistance to Prevent Homelessness form. Sub Grantee must confirm that no other [utility assistance](#), such as [LIHEAP](#), is available to prevent the shut-off. For example, if the household is going to have to abandon the housing due to a lack of utilities and can avoid moving to a shelter by having utilities paid, then CHHGP funds may be used for this purpose. Under another scenario, an applicant's lease may include a provision requiring utilities be maintained for the unit by the tenant. As a result, a utility shut-off could constitute a lease violation, thus placing the household at risk for eviction. In both cases, it is the Sub Grantee's responsibility to confirm and document in the client file that the utility company will in fact shut-off the utility if the amount due is not paid.
- ✓ Security deposits and utility deposits for a household moving into a new unit.
- ✓ CHHGP rent assistance may be used for move-in costs including but not limited to deposits and first months' rent associated with subsidized housing (where a household's rent is adjusted based on income), including project- or tenant-based housing. Rent assistance funds cannot be used for ongoing rent/utilities. In this context tax credit units are not considered subsidized housing.
- ✓ Application fees, background and credit check fees for rental housing.
- ✓ Lot rent for RV or manufactured home (structure must meet rent assistance guidelines including necessary housing certification/inspection and lead-based paint assessment).
- ✓ Costs of parking spaces when connected to a unit.
- ✓ Landlord incentives (provided there are written policies and/or procedures explaining what constitutes landlord incentives, how they are determined, and who has approval and review responsibilities).
- ✓ Reasonable storage costs.
- ✓ Reasonable moving costs such as truck rental and hiring a moving company.
- ✓ Hotel/Motel expenses for up to 90 days if unsheltered households are actively engaged in housing search and no other shelter option is available.
- ✓ Temporary absences. If a household must be temporarily away from his or her unit, but is expected to return (e.g., participant violates conditions of their DOC supervision and is placed in confinement for 30 days), Sub Grantees may pay for the households rent for up to 60 days and charge the grant for eligible costs. While a household is temporarily absent, he or she may continue to receive case management. Any temporary absence must be fully documented in the client file.

- ✓ Other costs as approved by City of Spokane.

The following activities are not eligible:

- ☒ CHHGP rent and rent/utility assistance in combination with CHHGP-funded facility support.
- ☒ More than 24 months of rent and utility assistance.
- ☒ Transportation costs for household members (e.g. bus, train and airplane tickets) related to initial move-in or for any subsequent moves.
- ☒ Furniture.
- ☒ Pet Deposits. Note: It is an unfair practice for a landlord to charge a tenant with a disability using a dog guide or service animal a pet deposit in addition to any standard cleaning or damage deposit charged to all tenants. (WAC 162-38-100)
- ☒ Cable, satellite or internet deposits or services.
- ☒ Portability. Households may not transfer their rent assistance to areas outside of the Sub Grantee's jurisdiction.

13 Permanent Supportive Housing

Operations are costs specifically attributed to case managers in a permanent supportive housing program working to meet the housing needs of households and helping them obtain housing stability.

13.1 Coordinated Entry

All programs receiving CHHGP funds will participate in the City of Spokane Coordinated Assessment and Entry Programs.

Programs serving households with children will accept all new program participants through the Homeless Families Coordinated Assessment Program (HFCA).

Programs serving households without children will accept all new program participants through the Single Homeless Coordinated Assessment Program once it is implemented in the summer of 2014.

13.2 Housing Stability Plan

13.2.1 Non Time-limited Permanent Supportive Housing

An assessment must address barriers to sustain permanent housing. Barriers may include criminal history, credit/rental history, ability to pay rent, and/or ability to follow lease. Re-assessment of PSH households must take place on a bi-annual basis.

The assessment must inform a plan which outlines needed services, referrals, goals and action steps leading to housing stability. The plan should be developed collaboratively with

the household. Both the assessment and plan, including completion dates of action steps, must be documented in the client file.

13.3 Allowable Expenses

- ✓ Housing Stability. Includes activities for the arrangement, coordination, monitoring, and delivery of services related to meeting the housing needs of households and helping them obtain housing stability. Services and activities may include developing, securing, and coordinating services including:
 - SSI/SSDI through [SSI/SSDI Outreach, Access, and Recovery \(SOAR\)](#)
 - [Affordable Care Act](#) activities that are specifically linked to the households stability plan;
 - Case management activities related to accessing Work Source employment services;
 - Monitoring and evaluating household progress;
 - Assuring that households' rights are protected; and
 - Developing an individualized housing and service plan, including a path to permanent housing stability subsequent to assistance.
- ✓ Data collection and entry
- ✓ Salaries/benefits for program staff
- ✓ Salaries/benefits to monitor Sub Grantees (or can charge in Administration)
- ✓ Office space, utilities, supplies, equipment (up to \$1,000 per grant period unless approved in advance by the City of Spokane, telephone, internet, and training/conferences/travel/per diem
- ✓ General liability insurance and automobile insurance
- ✓ Other costs as approved in advance by the City of Spokane

14 Facility Support

14.1 Assessment and Housing Stability Plan

14.1.1 Housing 90 days or less (congregate living)

Assessment and stability plans are not required for households living in short-term congregate living facilities.

14.1.2 Housing 90 days or less (single household units)

An assessment must address immediate barriers to obtaining housing (income, criminal history, credit/rental history) and barriers to maintaining housing stability (e.g. ability to pay rent, ability to follow lease) after the household leaves housing.

The assessment must inform a plan which outlines needed services, referrals, goals and action steps leading to housing stability. The plan should be developed collaboratively with the household. Both the assessment and plan, including completion dates of action steps, must be documented in the client file. If the household is currently working on a housing plan with another housing provider, the plan may be used and included in the client file.

14.1.3 Housing 90 days to 24 months (any unit type)

An assessment must address barriers to obtaining and maintaining permanent housing after the household leaves the temporary, facility-based housing. Barriers may include criminal history, credit/rental history, ability to pay rent, and/or ability to follow lease.

The assessment must inform a plan which outlines needed services, referrals, goals and action steps leading to housing stability. The plan should be developed collaboratively with the household. Both the assessment and plan, including completion dates of action steps, must be documented in the client file.

14.2 Unit Habitability for Facilities

14.2.1 Housing Inspections

Sub Grantees using CHHGP Facility Support funds to support single-household units (not congregate living) in which households will live for greater than 90 days and up to 24 months must conduct a housing inspection at least once a year.

Sub Grantees may adopt the [HUD Housing Quality Standards \(HQS\)](#) inspection procedures or the Commerce Housing Habitability Standards (HHS) procedures. If HQS is adopted, inspectors must be certified. Documentation of housing inspections must be readily accessible for review.

14.2.2 Lead-Based Paint Visual Assessments

To prevent lead-poisoning in young children, Sub Grantees 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 lead-based paint visual assessment must be completed for all units that meet the following conditions:

1. The unit was constructed prior to 1978.

2. A child under the age of six or pregnant woman is or will be living in the unit.

A visual assessment must be conducted annually. Visual assessments must be conducted by a HUD-Certified Visual Assessor ([Appendix K: Lead Based Paint Visual Assessment Requirements](#)), and must be documented on the HQS or HHS, and must be readily accessible for review.

14.2.3 Exceptions to the Lead-Based Paint Visual Assessment Requirements

There are certain exceptions to the requirement. Visual assessments are not triggered under the following circumstances:

- ✓ It is a zero-bedroom or SRO-sized unit;
- ✓ 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 – obtain 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, Sub Grantees need to document them.

For a guide to compliance see [Appendix K: Lead Based Paint Visual Assessment Requirements](#).

14.3 Allowable Expenses

- ✓ Lease or rent payment on a building. (If a Sub Grantee owns the building or has a mortgage payment on the building, they may not charge the grant “rent” and then reimburse themselves.)
- ✓ Utilities (gas /propane, land line 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 associated with providing the maintenance, mileage for maintenance staff).
- ✓ Security and janitorial (salaries and benefits associated with providing security, janitorial services).

- ✓ Essential facility equipment and supplies (e.g. common-use toiletries, food served in shelters, bedding, mats, cots, towels, microwave, etc.).
- ✓ Expendable transportation costs directly related to the transportation of eligible households (bus tokens and fuel for a shelter van).
- ✓ Hotel/Motel expenses for less than 90 days when no suitable shelter bed is available.
- ✓ On-site and off-site management costs related to the building.
- ✓ Facility specific insurance (mortgage insurance is not allowable) and accounting.
- ✓ Move in costs for permanent housing including: truck rental and hiring a moving company, application fees, background check fees, credit check fees, rent/security/utility deposits and first month's rent, and costs of urinalyses for drug testing of household members if necessary/required for housing.
- ✓ Other expenses as approved by the City of Spokane.

The following expenses are not eligible:

- ☒ Direct services other than those described above.
- ☒ Replacement or operating reserves.
- ☒ Debt service.
- ☒ Construction or rehabilitation of shelter facilities.
- ☒ CHHGP facility support in combination with CHHGP funded rent and rent/utility assistance.
- ☒ Any costs that are the responsibility of the tenant.
- ☒ Cable television service.

14.4 Maintenance Activities vs. Building Rehabilitation

As listed above, maintenance activities associated with a building are allowable Facility Support expenses. Building rehabilitation and capital improvements are not.

Before billing the grant, grantees should examine rental agreements (if leasing the building), product warranties, and insurance documents to determine what can be paid for from these sources.

Building rehabilitation and capital improvements 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.

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 (see examples in table below). 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 systems designed for occupant comfort and safety such as HVAC, electrical or mechanical systems, sanitation, fire suppression, and plumbing.

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 are Not Fixtures or Part of the Building (See above for definition of "fixtures.")
<ul style="list-style-type: none"> • Cleaning gutters and downspouts • Lawn and yard care (mowing, raking, weeding, trimming/pruning trees and shrubs) • Cleaning a portion of interior or exterior of building, including graffiti removal • Washing windows • Litter pick up and trash collection • Removing snow/ice • Unclogging sink and toilet 	<ul style="list-style-type: none"> • Fixing gutters • Mending cracked plaster • Patching roof • Caulking, weather stripping, re-glazing. • Replacing a broken window or screen • Reapplication of protective coatings • Fixing plumbing leaks • Repainting previously painted surface (including limited scraping)* • Waterproofing (sealant) • Servicing and maintenance of mechanical systems • Replacing a carpet square or patching carpet • Fixing alarm systems • Installing temporary fencing 	<p>Replacing:</p> <ul style="list-style-type: none"> • Kitchen appliances where removal would not cause any damage (for example dishwashers, stoves, refrigerators) • Light bulbs • Washing and drying machines • Air filters • Furniture

* Non-destructive methods only (eg., no sandblasting or high pressure spraying).

15 Essential Needs for HEN Households Only

15.1 Allowable Expenses

- ✓ Personal health and hygiene items (such as toothpaste, shampoo, toilet paper).
- ✓ Household cleaning supplies (such as laundry and dish soap), light bulbs, batteries.
- ✓ Bus passes, limited transportation.
- ✓ Grantees may use HEN funds to purchase and distribute laundry tokens (unused tokens cannot be exchanged for cash at the laundromat).
- ✓ Grantees may use HEN funds to provide automobile fuel vouchers. Grantees need to ensure that the vouchers cannot be exchanged for cash and they should be in limited/reasonable quantities.

The following expenses are not eligible:

- ☒ Retailer or merchant gift cards, vouchers or certificates for a household to purchase personal health, hygiene and household cleaning supplies.

16 Data Collection, Evaluation and Planning

16.1 Allowable Expenses

Data collection and entry (the time a case manager or program staff spend collecting and reporting data in HMIS) and staff time to plan and implement the Point-in-Time Count and Coordinated Entry and complete the Annual Homeless Housing Inventory Report, may be budgeted under *Program Operations* or *Data Collection, Evaluation and Planning*.

Allowable data collection, evaluation and planning expenses include but are not limited to salaries and benefits, office space, utilities, supplies, equipment (up to \$1,000 per grant period unless approved in advance by the City of Spokane), telephone, internet, and training/conferences/per diem specifically associated with the following CHHGP activities:

- ✓ State data warehouse and homeless management information system
- ✓ Annual Report - Housing Inventory/Point-in-Time Counts
- ✓ Local Homeless Plans
Counties must update and approve the local homeless plan ([RCW 43.185C.050](#)) at least every five years. Commerce will verify five year updates during monitoring reviews. Adopted plans must be consistent with the [Local Plan Guidelines](#) issued by Commerce at the time the plan was adopted.
- ✓ Coordinated Entry Planning/Implementation
See also [Coordinated Entry](#)

17 Administration

17.1 Allowable Expenses

Up to 7 percent of total reimbursed costs over the course of the grant period may be used for administration. This limit must be reconciled before the end of the grant period. The percentage of administration is based on the source funding your grant. Please reference your contract budget for your allowed administration budget.

Allowable administrative costs are those costs that benefit the organization as a whole. They may include the following: executive director/accounting/human resources/IT salaries, benefits, office supplies and equipment (up to \$1,000 per grant period unless approved in advance by the City of Spokane); general organization insurance; organization wide audits; board expenses; organization-wide membership fees and dues. This list is not all-inclusive.

General agency facilities costs are also allowable administrative expenses. They include the following: rent, building use allowances, and operations and maintenance costs such as janitorial and utilities. This list is not all-inclusive.

Facility costs directly attributable to the program may be charged to Program Operations.

Administrative and facilities expenses cannot be billed by equal monthly distributions of the budget amount. These costs must be charged to grant cost centers by one of the following three methods:

1. Billed directly such as IT services that are billed by the hour.
2. Allocated by means of a cost allocation plan.
3. Charged by use of an indirect cost rate which has been appropriately negotiated and approved.

18 Required CHHGP Policies and Procedures

In order to ensure that households assisted with CHHGP funds are served fairly and consistently, Sub Grantees must have written policies and/or procedures for the following topics. The City of Spokane will review these as part of grant monitoring.

- ✓ Sub Grantee (see section 4.1) (if contracting with other agencies)
- ✓ Confidentiality of Client records (see section 8.1)
- ✓ Termination of Participation and Grievance (see section 8.2.1)
- ✓ Applicant Denial and Grievance (see section 8.2.2)
- ✓ Recertification of Income Eligibility (see section 11.3)
- ✓ Rent Assistance (see section 14.5)
- ✓ Rent Reasonableness Determination (see section 14.8)
- ✓ Rent Limit/Payment Standard (see section 14.9)
- ✓ Landlord Certification and/or Inspections and Lead-Based Paint Visual Assessments for Rent Assistance (see section 14.10)
- ✓ Policy to ensure those unable to pay are not denied housing less than 90 days for Facility Support (see section 15)
- ✓ Inspections and Lead-Based Paint Visual Assessments for Facility Support (non-congregate living) >90 Days (see section 15.2)

- ✓ Record Retention (see grant agreement and section 22 Appendix A)

19 Changes to Guidelines

The City of Spokane may issue revised or new Guidelines at any time. All Sub Grantees will be sent revised copies as they are published. It is the Lead Grantee's responsibility to pass on the revisions to Sub Grantees in a timely manner.

The Homeless Management Information System (“HMIS”) is a client management system that maintains information regarding the characteristics and service needs of Clients for a variety of reasons, including the provision of more effective and streamlined services to Clients and the creation of information that communities can use to determine the use and effectiveness of services.

Ultimately, when used correctly and faithfully by all involved parties, the HMIS is designed to benefit multiple stakeholders, including provider agencies, persons who are homeless, funders and the community through improved knowledge about people who are homeless, their services and service needs and a more effective and efficient service delivery system.

The Homeless Housing and Assistance Act of 2005 requires the Department of Commerce to collect HMIS data in the form of a data warehouse. Each homeless service provider will submit HMIS data to Commerce.

Agency and the Department of Commerce agree as follows:

1. General Understandings:

- ✓ In this Agreement, the following terms will have the following meanings:
 - “Client” refers to a consumer of services.
 - “Partner Agency” refers generally to any Agency participating in HMIS.
 - “Agency staff” refers to both paid employees and volunteers.
 - “HMIS” refers to the HMIS system administered by Commerce.
 - “Enter(ing)” or “entry” refers to the entry of any Client information into HMIS.
 - “Shar(e)(ing),” or “Information Shar(e)(ing)” refers to the sharing of information which has been entered in HMIS with another Partner Agency.
 - “The Balance of State Continuum of Care Steering Committee” or “Steering Committee” refers to a Commerce advisory body that serves in a consultative and counseling capacity to Commerce as the system administrator. The Steering Committee is comprised of representatives from the State, the Balance of State Continuum of Care regions and at large members.
 - “Identified Information” refers to Client data that can be used to identify a specific Client. Also referred to as “Confidential” data or information.
 - “De-identified Information” refers to data that has specific Client demographic information removed, allowing use of the data **without identifying** a specific Client. Also referred to as “non-identifying” information.
- ✓ Agency understands that when it enters information into HMIS, such information will be available to Commerce staff who may review the data to administer HMIS; to conduct analysis in partnership with the Research and Data Analysis (RDA) division at the Department of Social and Health Services (DSHS); and to prepare reports that

may be submitted to others in de-identified form **without** individual identifying Client information.

- ✓ Agency understands that Agency will have the ability to indicate whether information Agency entered into HMIS may be shared with and accessible to Partner Agencies in HMIS system. Agency is responsible for determining and designating in HMIS whether information may or may not be shared.

Confidentiality:

- ✓ Agency will not:
 - enter information into HMIS which it is not authorized to enter; and
 - will not designate information for sharing which Agency is not authorized to share, under any relevant federal, state, or local confidentiality laws, regulations or other restrictions applicable to Client information. By entering information into HMIS or designating it for sharing, Agency represents that it has the authority to enter such information or designate it for sharing.
- ✓ If Agency is a “covered entity” whose disclosures are restricted under HIPAA (45 CFR 160 and 164) or is subject to Federal Drug and Alcohol Confidentiality Regulations (42 CFR Part 2), a fully executed Business Associate or Business Associate/Qualified Service Organization Agreement must be attached to this agreement before information may be entered. Sharing of information will not be permitted otherwise. More information about “covered entities” can be found here: <http://www.hhs.gov/ocr/privacy/hipaa/understanding/coveredentities/index.html>.
- ✓ If Agency is subject to any laws or requirements which restrict Agency’s ability to either enter or authorize sharing of information, Agency will ensure that any entry it makes and all designations for sharing fully comply with all applicable laws or other restrictions.
- ✓ Agency shall comply with the Violence Against Women and Department of Justice Reauthorization Act of 2005 (VAWA) and Washington State RCW 43.185C.030. No Identified Information may be entered into HMIS for Clients in licensed domestic violence programs or for Clients fleeing domestic violence situations.
- ✓ To the extent that information entered by Agency into HMIS is or becomes subject to additional restrictions, Agency will immediately inform Commerce in writing of such restrictions.

Information Collection, Release and Sharing Consent:

- ✓ **Collection of Client Identified information:** An agency shall collect client identified information only when appropriate to the purposes for which the information is

obtained or when required by law. An Agency must collect client information by lawful and fair means and, where appropriate, with the knowledge or consent of the individual.

- ✓ **Obtaining Client Consent:** In obtaining Client consent, each adult Client in the household must sign the ***HMIS Client Release of Information*** (or a Commerce-approved equivalent release document) to indicate consent to enter Client identified information into HMIS. If minors are present in the household, at least one adult in the household must consent minors by writing their names on the ***HMIS Client Release of Information***. If any adult member of a household does not provide written consent, identifying information may not be entered into HMIS for *anyone* in the household. An unaccompanied youth may sign the consent form for themselves.
 - Do not enter personally identifying information into HMIS for clients who are in licensed domestic violence agencies or currently fleeing or in danger from a domestic violence, dating violence, sexual assault or stalking situation.
 - Telephonic consent from the individual may temporarily substitute written consent provided that written consent is obtained at the first time the individual is physically present at Agency.
 - A Client may withdraw or revoke consent for Client identified information collection by signing the ***HMIS Revocation of Consent***. If a Client revokes their consent, Agency is responsible for immediately contacting Commerce and making appropriate data modifications in HMIS to ensure that Client's personal identified information will not be shared with other Partner Agencies or visible to the Agency staff within the system.
 - This information is being gathered for the collection and maintenance of a research database and data repository. The consent is in effect until the client revokes the consent in writing.
 - **No Conditioning of Services:** Agency will not condition any services upon or decline to provide any services to a Client based upon a Client's refusal to allow entry of identified information into HMIS.
 - **Re-release Prohibited:** Agency agrees not to release any Client identifying information received from HMIS to any other person or organization without written informed Client consent, or as required by law.
 - **Client Inspection/Correction:** Agency will allow a Client to inspect and obtain a copy of his/her own personal information except for information compiled in reasonable anticipation of, or for use in, a civil, criminal, or administrative action or proceeding. Agency will also allow a Client to correct information that is inaccurate. Corrections may be made by way of a new entry that is in addition to, but is not a replacement for, an older entry.

- ✓ **Security:** Agency will maintain security and confidentiality of HMIS information and is responsible for the actions of its users and for their training and supervision. Among the steps Agency will take to maintain security and confidentiality are:
- **Access:** Agency will permit access to HMIS or information obtained from it only to authorized Agency staff who need access to HMIS for legitimate business purposes (such as to provide services to the Client, to conduct evaluation or research, to administer the program, or to comply with regulatory requirements). Agency will limit the access of such staff to only those records that are immediately relevant to their work assignments.
 - **User Policy:** Prior to permitting any user to access HMIS, Agency will require the user to sign a **User Policy, Responsibility Statement & Code of Ethics** ("User Policy"), which is found on the Commerce web page (www.commerce.wa.gov/hmiswa) and is incorporated into this agreement and may be amended from time to time by Commerce. Agency will comply with, and enforce the User Policy and will inform Commerce immediately in writing of any breaches of the User Policy
 - **Computers:** Security for data maintained in HMIS depends on a secure computing environment. Computer security is adapted from relevant provisions of the Department of Housing and Urban Development's (HUD) "Homeless Management Information Systems (HMIS) Data and Technical Standards Notice" (Docket No. FR 4848-N-01; see <http://www.hud.gov/offices/cpd/homeless/hmis/standards/index.cfm>). Agencies are encouraged to directly consult that document for complete documentation of HUD's standards relating to HMIS.
- ✓ Agency agrees to allow access to HMIS only from computers which are:
- owned by Agency or approved by Agency for the purpose of accessing and working with HMIS.
 - protected from viruses by commercially available virus protection software.
 - protected with a software or hardware firewall.
 - maintained to insure that the computer operating system running the computer used for the HMIS is kept up to date in terms of security and other operating system patches, updates, and fixes.
 - accessed through web browsers with 128-bit encryption (e.g., Internet Explorer, version 6.0). Some browsers have the capacity to remember passwords, so that the user does not need to type in the password when returning to password-protected sites. This default shall **not** be used with respect to Commerce' HMIS; the end-user is expected to physically enter the password each time he or she logs on to the system.

- staffed at all times when in public areas. When computers are not in use and staff is not present, steps should be taken to ensure that the computers and data are secure and not publicly accessible. These steps should minimally include: logging off the data entry system, physically locking the computer in a secure area, or shutting down the computer entirely.
- ✓ **Passwords:** Agency will permit access to HMIS only with use of a User ID and password, which the user may not share with others. Written information pertaining to user access (e.g. username and password) shall not be stored or displayed in any publicly accessible location.

Passwords shall be at least eight characters long and meet industry standard complexity requirements, including, but not limited to, the use of at least one of each of the following kinds of characters in the passwords: Upper and lower-case letters, and numbers and symbols. Passwords shall not be, or include, the username, or the HMIS name. In addition, passwords should not consist entirely of any word found in the common dictionary or any of the above spelled backwards. The use of default passwords on initial entry into the HMIS application is allowed so long as the .default password is changed on first use. Passwords and user names shall be consistent with guidelines issued from time to time by HUD and/or Commerce.

- ✓ **Training/Assistance:** Agency will permit access to HMIS only after the authorized user receives appropriate confidentiality training including that provided by Commerce. Agency will also conduct ongoing basic confidentiality training for all persons with access to HMIS and will train all persons who may receive information produced from HMIS on the confidentiality of such information. Agency will participate in such training as is provided from time to time by Commerce. Commerce will be reasonably available during Commerce defined weekday business hours for technical assistance (i.e. troubleshooting and report generation).
- ✓ **Records:** Agency and Commerce will maintain records of any disclosures of Client identifying information either of them makes of HMIS information for a period of **seven** years after such disclosure. On written request of a Client, Agency and Commerce will provide an accounting of all such disclosures within the prior **seven**-year period. Commerce will have access to an audit trail from HMIS so as to produce an accounting of disclosures made from one Agency to another by way of sharing of information from HMIS.
- ✓ **Destruction of paper copies of personally identifying information:** Agencies must develop and adopt policies governing the destruction of paper records containing personally identifying information derived from a Homeless Management Information system. Such records must be retained for a period of six years following the date of final payment and destroyed at the end of the period. The

policy must define the process that will be used to destroy the records to prevent the release of personally identifying information.

4. Information Entry Standards:

- ✓ Information entered into HMIS by Agency will be truthful, accurate and complete to the best of Agency's knowledge.
- ✓ Agency will **not** solicit from Clients or enter information about Clients into the HMIS database unless the information is required for a legitimate business purpose such as to provide services to the Client, to conduct evaluation or research, to administer the program, or to comply with regulatory requirements.
- ✓ Agency will only enter information into HMIS database with respect to individuals that it serves or intends to serve, including through referral.
- ✓ Agency will enter all data for a particular month into HMIS database by the 5th business day of the following month. Additionally, Agency will make every attempt enter all data for a particular week by the end of that week.
- ✓ Agency will not alter or over-write information entered by another Agency.

5. Use of HMIS:

- ✓ Agency will not access identifying information for any individual for whom services are neither sought nor provided by the Agency. Agency may access identifying information of the Clients it serves and may request via writing access to statistical, non-identifying information on both the Clients it serves and Clients served by other HMIS participating agencies.
- ✓ Agency may report non-identifying information to other entities for funding or planning purposes. Such non-identifying information shall not directly identify individual Clients.
- ✓ Agency and Commerce will report only non-identifying information in response to requests for information from HMIS unless otherwise required by law.
- ✓ Agency will use HMIS database for legitimate business purposes only.
- ✓ Agency will not use HMIS in violation of any federal or state law, including, but not limited to, copyright, trademark and trade secret laws, and laws prohibiting the transmission of material, which is threatening, harassing, or obscene.
- ✓ Agency will not use the HMIS database to defraud federal, state or local governments, individuals or entities, or conduct any illegal activity.

6. Proprietary Rights of the HMIS:

- ✓ Agency shall not give or share assigned passwords and access codes for HMIS with any other Agency, business, or individual. Each user shall request their own login and password.
- ✓ Agency shall take due diligence not to cause in any manner, or way, corruption of the HMIS database, and Agency agrees to be responsible for any damage it may cause.
- ✓ **Steering Committee:** Commerce will consult with the Steering Committee from time to time regarding issues such as revision to the form of this Agreement. Written Agency complaints that are not resolved may be forwarded to the Steering Committee, which will try to reach a voluntary resolution of the complaint.
- ✓ **Limitation of Liability and Indemnification:** No party to this Agreement shall assume any additional liability of any kind due to its execution of this agreement of participation in the HMIS. It is the intent of the parties that each party shall remain liable, to the extent provided by law, regarding its own acts and omissions; but that no party shall assume additional liability on its own behalf or liability for the acts of any other person or entity except for the acts and omissions of their own employees, volunteers, agents or contractors through participation in HMIS. The parties specifically agree that this agreement is for the benefit of the parties only and this agreement creates no rights in any third party.
- ✓ **Limitation of Liability.** Commerce shall not be held liable to any member Agency for any cessation, delay or interruption of services, nor for any malfunction of hardware, software or equipment.
- ✓ **Disclaimer of Warranties.** Commerce makes no warranties, express or implied, including the warranties of merchandise ability and fitness for a particular purpose, to any Agency or any other person or entity as to the services of the HMIS to any other matter.

7. Additional Terms and Conditions:

- ✓ Agency will abide by such guidelines as are promulgated by HUD and/or Commerce from time to time regarding administration of the HMIS.
- ✓ Agency and Commerce intend to abide by applicable law. Should any term of this agreement be inconsistent with applicable law, or should additional terms be required by applicable law, Agency and Commerce agree to modify the terms of this agreement so as to comply with applicable law.
- ✓ Neither Commerce nor Agency will transfer or assign any rights or obligations regarding HMIS without the written consent of either party.
- ✓ Agency agrees to indemnify and hold Commerce and its agents and staffs harmless from all claims, damages, costs, and expenses, including legal fees and

disbursements paid or incurred, arising from any breach of this Agreement or any of Agency's obligations under this Agreement.

- ✓ This Agreement will be in force until terminated by either party. Either party may terminate this agreement at will with 20 days written notice. Either party may terminate this agreement immediately upon a material breach of this Agreement by the other party, including but not limited to the breach of the Commerce Security Policy by Agency.
- ✓ If this Agreement is terminated, Agency will no longer have access to HMIS. Commerce and the remaining Partner Agencies will maintain their right to use all of the Client information previously entered by Agency except to the extent a restriction is imposed by Client or law.
- ✓ Copies of Agency data will be provided to the Agency upon written request of termination of this agreement. Data will be provided on CDs or media. Unless otherwise specified in writing, copies of data will be delivered other mutually agreed upon to Agency within fourteen (14) calendar days of receipt of written requests for data copies.

Client Records and Record Retention

Lead and Sub Grantees must enter a record for every client served with CHG funds in the state homeless data warehouse (usually referred to as “HMIS”) or in a local data collection system that meets HUD/HMIS data standards. The client record may contain personally identifying data or it may not, depending on whether the client provided informed, written consent to have their identifiers stored in HMIS. As a general rule, Commerce does not want personal identifiers for any client who identifies themselves as a victim of domestic violence, sexual assault, dating violence or stalking.

Agencies must develop and adopt policies governing the retention of paper records containing personally identifying information derived from a Homeless Management Information System. The policy must define how long paper records are retained after they are no longer being actively utilized, and the process that will be used to destroy the records to prevent the release of personally identifying information. The policy must require the destruction of the paper records derived from an HMIS no longer than seven years after the last day the person was served by the organization.

Funding Decisions & Data Collection

Lead Grantees must not make funding or resource allocation decisions of CHG funds based on whether a Sub Grantee enters *personal identifiers* for victims of domestic violence, sexual assault, dating violence or stalking or other clients who have not provided informed, written consent. The intent of this guideline is to ensure that clients do not feel coerced into providing consent to share data at any time in any local jurisdiction receiving CHG funds and participating in HMIS.

Data quality is of high concern for purposes of accurate reporting out of HMIS. Commerce recommends that local jurisdictions continue to strive for increased data quality including 1) monitoring completeness of required data elements and 2) monitoring responsible use of HMIS at local agencies. Some suggestions for how to appropriately include data quality in HMIS as a part of local funding decisions include, but are not limited to:

✓ Completeness of required data elements:

- Exclude clients who “refused consent” from the equation
e.g.: Instead of $\frac{\# \text{ NULL values }}{\text{All client records}} = \%$ use $\frac{\# \text{ NULL values }}{\text{Clients who DIDN'T refuse consent}} = \%$

✓ Responsible use of HMIS at local agencies:

- Develop a “baseline” rate of “refused consent” locally using HMIS data
- Determine each agency’s rate of “refused consent” as a percent deviation from the standard

- Add or subtract points for less or more deviation from the standard rate, depending on reasonableness
- Further training, technical assistance, or other guidance may be more appropriate in this situation instead of, or in addition to, penalties assessed during funding competitions

All local jurisdictions interested in including a measure of HMIS data quality as part of a local funding decision for CHG funding are required to submit a proposal to Commerce for final approval prior to being used in local applications/competitions for funding.

Informed Consent – According to RCW 43.185C.180, personally identifying information about homeless individuals for the Washington homeless client management information system may only be collected after having obtained informed, reasonably time limited, (i) written consent from the homeless individual to whom the information relates, or (ii) telephonic consent from the homeless individual, provided that written consent is obtained at the first time the individual is physically present at an organization with access to the Washington homeless client management information system. Safeguards consistent with federal requirements on data collection must be in place to protect homeless individuals' rights regarding their personally identifying information. Data collection under this subsection shall be done in a manner consistent with federally informed consent guidelines regarding human research which, at a minimum, require that individuals receive: (i) information about the expected duration of their participation in the Washington homeless client management information system; (ii) an explanation of whom to contact for answers to pertinent questions about the data collection and their rights regarding their personal identifying information; (iii) an explanation regarding whom to contact in the event of injury to the individual related to the Washington homeless client management information system; (iv) a description of any reasonably foreseeable risks to the homeless individual; and (v) a statement describing the extent to which confidentiality of records identifying the individual will be maintained.

Personal Identifiers – “Personally Identifying Data”

Individually identifying information for or about an individual including information likely to disclose the location of a victim of domestic violence, dating violence, sexual assault, or stalking, could include:

- ✓ A first and last name;
- ✓ A home or other physical address;
- ✓ Contact information (including a postal, e-mail or Internet protocol address, or telephone or facsimile number);
- ✓ A social security number; and

- ✓ Any other information, including date of birth, racial or ethnic background, or religious affiliation that, in combination with any other non-personally identifying information, would serve to identify any individual collecting “non-identified” client records.

Data Entry for “Non-identified” Client Records

- ✓ Leave the “Name” fields NULL (blank). Do not write in names *such as “Anonymous” or “Refused” as that will compromise data quality at the state level.*
- ✓ *If there are no personal identifiers* for a client record, there needs to be an “Agency Unique ID” of some sort created and stored in the system that can be used by the agency to access the record at a later time (and should not be an algorithm of elements that can lead to the client’s identification).
- ✓ Enter an approximate year of birth – subtract or add one to three years to the actual year of birth.
- ✓ Enter “Refused” for gender, race, and ethnicity when the real answers to those questions, in combination with other data, can potentially lead to identification of the client.
- ✓ Enter any additional answer to the universal, program-specific and optional data elements (from the March 2010 HMIS Data Standards) only if the answers to those questions, in combination with other data, will not lead to the identification of the client.
- ✓ Program Entry Date, Program Exit Date and Service Date are generally required unless those elements can be used in combination with other elements to identify the client. If this is the case, please enter an approximate Program Entry Date, Program Exit Date and Service Date by adding one to three months to the actual dates and keeping the “Length of Stay” (the number of days between program entry and program exit) consistent with reality. Keeping the approximate service date, if used, within the actual service date’s reporting period is also recommended.

Submitting data to the state data warehouse – If a Lead or Sub Grantee is not entering data directly into the state data warehouse, the data being entered into the local HMIS must be submitted on a quarterly basis no later than the 10th day following the end of each quarter to the state data warehouse via the HUD Standard 3.0 XML schema.

22 Appendix C: Benefits Verification System and eJAS Data Security Requirements

1. **Definitions.** The words and phrases listed below, as used in this Exhibit, 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.
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 contain no 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 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 Degaussing sufficiently to ensure that the Data cannot be reconstructed, or 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 Department of Commerce Contact designated in the Grant Agreement within one (1) business day of discovery.
- 7. Data shared with Subcontractors.** If DSHS Data access provided under this Contract is to be shared with a subcontractor, the Contract with the subcontractor must include all of the data security provisions within this Contract and within any amendments, attachments, or exhibits within this Contract.

23 Appendix D: Housing Status Documentation Standards

Homeless				At Risk of Becoming Homeless		
Unsheltered (place not meant for human habitation)	Residing in a temporary housing program	Exiting a system of care	Fleeing domestic violence, dating violence, sexual assault, stalking, etc.	Losing housing within 14 days	Nonpayment of rent	Nonpayment of utilities (see program guidelines for eligibility)
<p>Third party verification</p> <p>OR</p> <p>Self-declaration signed and dated by applicant stating where they are residing. <u>Self-declaration of housing status should be used very rarely and only when written third-party verification cannot be obtained.</u></p>	<p>Letter signed and dated from the provider of the temporary housing.</p> <p>OR</p> <p>A telephone call to the provider of temporary housing that is documented, signed, and dated by the case manager making the call</p> <p>OR</p> <p>Current HMIS record from homeless housing program, including dates of stay</p> <p>OR</p> <p>Self-declaration signed and dated by applicant stating where they are residing. <u>Self-declaration of housing status should be used very rarely and only when written third-party verification cannot be obtained.</u></p>	<p>Letter signed and dated by system of care representative. Letter must include:</p> <ol style="list-style-type: none"> Statement verifying current stay of household member(s), and Indicate household member(s) have no available housing option after exiting 	<p>Signed and dated self-declaration by applicant.</p>	<p>Letter signed and dated from the provider of the temporary residence (e.g. homeowner, landlord, motel owner/manager). Letter must include:</p> <ol style="list-style-type: none"> Statement verifying the applicant's current living situation, and Date when the household must vacate the temporary housing <p>OR</p> <p>A telephone call to the provider of temporary housing that is documented, signed, and dated by the case manager making the call</p> <p>OR</p> <p>Self-declaration signed and dated by applicant stating where they are residing. <u>Self-declaration of housing status should be used very rarely and only when written third-party verification cannot be obtained.</u></p>	<p>Copy of lease naming household member as lease holder or other written occupancy agreement identifying them as legal tenant of unit.</p> <p>AND</p> <p>"Pay or Vacate" notice or eviction notice</p>	<p>Copy of lease naming household member as lease holder or other written occupancy agreement identifying them as legal tenant of unit</p> <p>AND</p> <p>Utility Shutoff Notice that:</p> <ol style="list-style-type: none"> Identifies the household member, and Indicates that utility will be shut off or disconnected if payment not received, and Is signed and dated by utility company representative and/or includes utility company contact information <p>AND</p> <p>A statement from the provider that without CHGP assistance, the household will lose their housing and become homeless. Staff must first check that LIHEAP or other utility assistance is not available.</p>

24 Appendix E: Income Eligibility Documentation Standards

While the City of Spokane has established standards for various types of income, the City recognizes that in some instances only applicant self-declaration may be possible. This method should be used only as a *last resort* when all other verification methods are not possible or reasonable. When using applicant self-declaration, Sub Grantees must document why a higher verification standard was not used. Be sure to include this in the case file.

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.

Type of Income

Type of Income	Acceptable Types of Documentation
Wages and Salary	<p>Obtain copy of most recent pay stub(s). Copy kept in client file.</p> <p><i>OR Written 3rd Party Verification</i></p> <p>Mail, fax or email verification of income request to employer. At a minimum, written verification must include: names of employer and employee, pay amount and frequency, average hours worked per week, amount of any additional compensation. Copy kept in client file.</p> <p><i>OR Oral 3rd Party Verification</i></p> <p>Contact the employer by phone or in person. At a minimum, oral verification must include: names of employer and employee, pay amount and frequency, average hours worked per week, amount of any additional compensation and be signed and dated by staff who obtained the information. Copy kept in client file.</p> <p><i>OR Self-Declaration</i></p> <p>Obtain signed and dated self-declaration from the household member. At a minimum must include source of income, income amount and frequency, and be signed. Copy kept in client file. Case manager must document attempts to obtain written and oral verification.</p> <p>Self-declaration for HEN households can be obtained through telephone or email.</p>

Self-Employment and Business Income	<p>Obtain copy of most recent federal and state tax return from the applicant and keep copy in client file.</p> <p><i>OR Self Declaration</i></p> <p>Obtain signed and dated self-declaration from the household member. At a minimum must include source of income, income amount and frequency and be signed. Copy kept in client file. Case manager must document attempts to obtain written and oral verification.</p> <p>Self-declaration for HEN households can be obtained through telephone or email.</p>
Interest and Dividend Income	<p>Obtain copy of most recent interest or dividend income statement from the household member and keep copy in client file.</p> <p><i>OR</i></p> <p>Obtain copy of most recent federal and state tax return from the applicant and keep copy in client file.</p> <p><i>OR Self Declaration</i></p> <p>Obtain signed and dated self-declaration from the household member. At a minimum must include source of income, income amount and frequency and be signed. Copy kept in client file. Case manager must document attempts to obtain written and oral verification.</p> <p>Self-declaration for HEN households can be obtained through telephone or email.</p>
Pension/Retirement Income	<p>Obtain copy of most recent payment statement, benefit notice from Social Security, pension provider or other source. Copy kept in client file.</p> <p><i>OR Written 3rd Party Verification</i></p> <p>Mail, fax or email verification of income request to Social Security, pension provider or other source. At a minimum, written verification must include: name of income source, income amount. Copy kept in client file.</p> <p><i>OR Oral 3rd Party Verification</i></p> <p>Contact the source by phone or in person. At a minimum, oral verification must include: Name of income source, income amount and be signed and dated by income source representative. Copy kept in client file.</p> <p><i>OR Self Declaration</i></p> <p>Obtain signed and dated self-declaration from the household member. At a minimum must include source of income, income amount and frequency and be signed. Copy kept in client file. Case manager must document attempts to</p>

	<p>obtain written and oral verification. Self-declaration for HEN households can be obtained through telephone or email.</p>
Unemployment and Disability Income	<p>Obtain copy of most recent payment statement or benefit notice. Copy kept in client file.</p> <p><i>OR Written 3rd Party Verification</i></p> <p>Mail, fax or email verification of income request to unemployment administrator, workers compensation administrator of former employer. At a minimum, written verification must include: name of income source, income amount. Copy kept in client file.</p> <p><i>OR Oral 3rd Party Verification</i></p> <p>Contact the source by phone or in person. At a minimum, oral verification must include: Name of income source, income amount and be signed and dated by income source representative. Copy kept in client file.</p> <p><i>OR Self Declaration</i></p> <p>Obtain signed and dated self-declaration from the household member. At a minimum must include source of income, income amount and frequency and be signed. Copy kept in client file. Case manager must document attempts to obtain written and oral verification.</p> <p>Self-declaration for HEN households can be obtained through telephone or email.</p>
TANF/Public Assistance	<p>Obtain copy of most recent payment statement, benefit notice, or Department of Social and Health Services (DSHS) Benefits Verification System (BVS) print out. Copy kept in client file.</p> <p><i>OR Written 3rd Party Verification</i></p> <p>Mail, fax or email verification of income request to welfare administrator. At a minimum, written verification must include: name of income source, income amount. Copy kept in client file.</p> <p><i>OR Oral 3rd Party Verification</i></p> <p>Contact the source by phone or in person. At a minimum, oral verification must include: name of income source, income amount and be signed and dated by income source representative. Copy kept in client file.</p>

Alimony, Child Support, Foster Care Payments	<p>Obtain copy of most recent payment statement, notices, or orders. Copy kept in client file.</p> <p><i>OR Written 3rd Party Verification</i></p> <p>Mail, fax or email verification of income request to child support enforcement agency, court liaison or other source. At a minimum, written verification must include: name of income source, income. Copy kept in client file.</p> <p><i>OR Oral 3rd Party Verification</i></p> <p>Contact the source by phone or in person. At a minimum, oral verification must include: name of income source, income amount and be signed and dated by income source representative. Copy kept in client file.</p> <p><i>OR Self Declaration</i></p> <p>Obtain signed and dated self-declaration from the household member. At a minimum must include source of income, income amount and frequency and be signed. Copy kept in client file. Case manager must document attempts to obtain written and oral verification.</p> <p>Self-declaration for HEN households can be obtained through telephone or email.</p>
Armed Forces Income	<p>Copy of pay stubs, payment statement, or other government issued statement indicating income amount.</p> <p><i>OR Written 3rd Party Verification</i></p> <p>Mail, fax or email verification of income request directly from the appropriate armed services representative. At a minimum, written verification must include: name of income source, income. Copy kept in client file.</p> <p><i>OR Oral 3rd Party Verification</i></p> <p>Contact the source by phone or in person. At a minimum, oral verification must include: name of income source, income amount and be signed and dated by income source representative. Copy kept in client file.</p> <p><i>OR Self Declaration</i></p> <p>Obtain signed and dated self-declaration from the household member. At a minimum must include source of income, income amount and frequency and be signed. Copy kept in client file. Case manager must document attempts to obtain written and oral verification.</p> <p>Self-declaration for HEN households can be obtained through telephone or email.</p>

Income Inclusions

This table presents CHHGP income inclusions. The following types of income must be counted when calculating gross income for purposes of determining CHHGP eligibility.

General Category	Description
1. Earned Income	The full amount of gross income earned before taxes and deductions.
2. Self-Employment/Business Income	The net income earned from the operation of a business, i.e., total revenue minus business operating expenses. This also includes any withdrawals of cash from the business or profession for your personal use.
3. Interest & Dividend Income	Monthly interest and dividend income credited to an applicant's bank account and available for use.
4. Pension/Retirement Income	The monthly payment amount received from Social Security, annuities, retirement funds, pensions, disability and other similar types of periodic payments.
5. Unemployment & Disability Income	Any monthly payments in lieu of earnings, such as unemployment, disability compensation, SSI, SSDI, and worker's compensation.
6. TANF/Public Assistance	Monthly income from government agencies excluding amounts designated for shelter, and utilities, WIC, food stamps, and childcare.
7. Alimony, Child Support and Foster Care Income	Alimony, child support and foster care payments received from organizations or from persons not residing in the dwelling.
8. Armed Forces Income	All basic pay, special day and allowances of a member of the Armed Forces excluding special pay for exposure to hostile fire.

Income Exclusions

This table presents CHHGP income exclusions. The following types of income are not counted when calculating gross income for purposes of determining CHHGP eligibility:

General Category	Description
1. Income of Children	Income from employment of children (including foster children) under the age of 18 years.
2. Inheritance and Insurance Income	Lump-sum additions to household assets, such as inheritances, insurance payments (including payments under health and accident insurance and worker's compensation), capital gains and settlement for personal or property losses (except as provided in number 5 of Income Inclusions).
3. Medical Expense Reimbursements	Amounts received by the household that are specifically for, or in reimbursement of, the cost of medical expenses for any household member.
4. Income of Live-in Aides	Income of a live-in aide (as defined in 24 CFR 5.403).
5. Disabled Persons	Certain increases in income of a disabled member of qualified households residing in HOME-assisted housing or receiving HOME tenant-based rental assistance (24 CFR 5.671(a)).
6. Student Financial Aid	The full amount of student financial assistance paid directly to the student or to the educational institution.
7. Armed Forces Hostile Fire	The special pay to a household member serving in the Armed Forces

Pay	who is exposed to hostile fire.
8. Self-Sufficiency Program Income	a) Amounts received under training programs funded by HUD. b) Amounts received by a person with a disability that are disregarded for a limited time for purposes of Supplemental Security Income eligibility and benefits because they are set aside for use under a Plan to Attain Self-Sufficiency (PASS). c) Amounts received by a participant in other publicly assisted programs that are specifically for, or in reimbursement of, out-of-pocket expenses incurred (special equipment, clothing, transportation, childcare, etc.) and which are made solely to allow participation in a specific program. d) Amounts received under a resident service stipend. A resident service stipend is a modest amount (not to exceed \$200 per month) received by a resident for performing a service for the PHA or owner, on a part-time basis, that enhances the quality of life in the development. Such services may include, but are not limited to, fire patrol, hall monitoring, lawn maintenance, resident initiatives coordination, and serving as a member of the PHA's governing board. No resident may receive more than one such stipend during the same period of time. e) Incremental earnings and benefits resulting to any household member from participation in qualifying state or local employment training programs (including training not affiliated with a local government) and training of a household member as resident management staff. Amounts excluded by this provision must be received under employment training programs with clearly defined goals and objectives, and are excluded only for the period during which the household member participates in the employment training program.
9. Other Non-Recurring Income	Temporary, nonrecurring, or sporadic income (including gifts).
10. Reparations	Reparation payments paid by a foreign government pursuant to claims filed under the laws of that government by persons who were persecuted during the Nazi era.
11. Income from Full-time Students	Annual earnings in excess of \$480 for each full-time student 18 years old or older (excluding the head of household or spouse).
12. Adoption Assistance Payments	Adoption assistance payments in excess of \$480 annually per adopted child.
13. Social Security & SSI Income	Deferred periodic amounts from SSI and Social Security benefits that are received in a lump sum amount or in prospective monthly amounts.
14. Income Tax and Property Tax Refunds	Amounts received by the household in the form of refunds or rebates under state or local law for property taxes paid on the dwelling unit.
15. Home Care Assistance	Amounts paid by a state agency to a household with a member who has a developmental disability and is living at home to offset the cost of services and equipment needed to keep this developmentally disabled household member at home.
16. Other Federal Exclusions	Amounts specifically excluded by any other federal statute from consideration as income for purposes of determining eligibility or benefits under a category of assistance programs that includes assistance under any program to which the exclusions of 24 CFR 5.609(c) apply, including: The value of the allotment made under the Food Stamp Act of 1977; Payments received under the Domestic Volunteer Service Act of 1973 (employment through VISTA, Retired Senior Volunteer Program, Foster Grandparents Program, youthful offender incarceration alternatives, senior companions); Payments

	<p>received under the Alaskan Native Claims Settlement Act; Income derived from the disposition of funds to the Grand River Band of Ottawa Indians; Income derived from certain sub-marginal land of the United States that is held in trust for certain Indian tribes; Payments or allowances made under the Department of Health and Human Services' Low-Income Home Energy Assistance Program; Payments received under the Maine Indian Claims Settlement Act of 1980 (25 U.S.C. 1721); The first \$2,000 of per capita shares received from judgment funds awarded by the Indian Claims Commission or the U.S. Claims Court and the interests of individual Indians in trust or restricted lands, including the first \$2,000 per year of income received by individual Indians from funds derived from interests held in such trust or restricted lands; Amounts of scholarships funded under Title IV of the Higher Education Act of 1965, including awards under the Federal work study program or under the Bureau of Indian Affairs student assistance programs; Payments received from programs funded under Title V of the Older Americans Act of 1985 (Green Thumb, Senior Aides, Older American Community Service Employment Program); Payments received on or after January 1, 1989, from the Agent Orange Settlement Fund or any other fund established pursuant to the settlement in the In Re Agent Orange product liability litigation, M.D.L. No. 381 (E.D.N.Y.); Earned income tax credit refund payments received on or after January 1, 1991, including advanced earned income credit payments; The value of any child care provided or arranged (or any amount received as payment for such care or reimbursement for costs incurred for such care) under the Child Care and Development Block Grant Act of 1990; Payments received under programs funded in whole or in part under the Job Training Partnership Act (employment and training programs for Native Americans and migrant and seasonal farm workers, Job Corps, state job training programs and career intern programs, AmeriCorps); Payments by the Indian Claims Commission to the Confederated Tribes and Bands of Yakima Indian Nation or the Apache Tribe of Mescalero Reservation; Allowances, earnings, and payments to AmeriCorps participants under the National and Community Service Act of 1990; Any allowance paid under the provisions of 38 U.S.C. 1805 to a child suffering from spina bifida who is the child of a Vietnam veteran; Any amount of crime victim compensation (under the Victims of Crime Act) received through crime victim assistance (or payment or reimbursement of the cost of such assistance) as determined under the Victims of Crime Act because of the commission of a crime against the applicant under the Victims of Crime Act; and Allowances, earnings, and payments to individuals participating in programs under the Workforce Investment Act of 1998.</p>
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26 Appendix G: Consolidated Homeless Grant Required Forms

CHHGP forms that are in Word format are included below. CHHGP forms that are in Excel format are included on the City of Spokane CHHS website .

26.1 Consolidated Homeless Grant Client File Checklist

Use of a client file checklist is required to record the contents of each client file and ensure file consistency overall. Programs may choose to create their own checklist but the components of this checklist must be included. Documentation must be thorough and accompany each form as needed. The following forms must be included in each client file unless otherwise noted:

- ☐ Client File Checklist
- ☐ HMIS Consent Form (See

[Appendix B](#): Data Collection Directives). If the form is kept in another file or central location, this should be noted on the client file checklist.

- ☐ CHHGP Verification of Household Eligibility and Income Recertification form with backup documentation
- ☐ CHHGP Income Eligibility Worksheet or equivalent, if applicable
- ☐ Landlord Habitability Standard Certification Form for Rent Assistance
AND/OR
- ☐ HSS or HQS Inspection Checklist. If the form is kept in another file or central location, this should be noted on the client file checklist.
- ☐ Utility Assistance to Prevent Homelessness Form, if applicable
- ☐ Executed Lease (or rent agreement) for rent subsidies paid to a landlord.
OR
- ☐ Certification of Payment Obligation for rent subsidies paid to a friend or family member.
- ☐ Rent Reasonableness form or a certification of rent reasonableness based on documentation requirements specified in your program policies/procedures.
- ☐ Exception to rent limit standard documentation, if applicable
- ☐ Lead Based Paint Assessment form, if applicable
- ☐ Assessment and Housing Stability Plan
- ☐ Temporary Absence, if applicable
- ☐ Household rent share/rent subsidy calculations for rent assistance

26.2 Consolidated Homeless Grant Verification of Household Eligibility and Income Recertification Instructions

This form is required **ONLY** when providing:

- Rent/utility assistance for any length of stay, **OR**
- Facility Support with a length of stay greater than 90 days.

This form is **NOT** required when providing:

- Bed nights in a congregate living facility for any length of stay, **OR**
- Facility Support with a length of stay 90 days or less.

Section 1	Client Identification	Enter client name and HMIS Client Identifier. (FYI for non-data integration grantees/sub grantees - the client identifier is the number located in the yellow Active Client Record box.)
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Section 2	Housing Status Verification	Complete the section by checking the appropriate box(es). The documentation should be clearly evident in the client file and preferably filed directly after this form.
Section 3	Income Verification and Recertification	Complete the section by checking the appropriate box(es). The documentation should be clearly evident in the client file and preferably filed directly after this form. For recertification enter the date and check the appropriate box(es).
Section 4	Eligible Children Verification	Complete the section by checking the appropriate box. The documentation should be clearly evident in the client file and preferably filed directly after this form.
Section 5	Signature	Sign and date the form.

26.3 Consolidated Homeless Grant Verification Household Eligibility and Income Recertification

This form is required **ONLY** when providing rent/utility assistance for any length of stay **OR** Facility Support with a length of stay greater than 90 days. This form is **NOT** required when providing bed nights in a congregate living facility for any length of stay **OR** Facility Support with a length of stay 90 days or less.

Section 1- Client Identification:

Client Name	
HMIS Client Identifier	

Section 2 – Housing Status Verification:

Situation		Required Documentation
Homeless	Unsheltered (place not meant for human habitation)	<input type="checkbox"/> Third party verification OR <input type="checkbox"/> Self-declaration signed and dated by applicant stating where they are residing. <u>Self-declaration of housing status should be used very rarely and only when written third-party verification cannot be obtained.</u>
	Residing in a temporary housing program	<input type="checkbox"/> Letter signed and dated from the provider of the temporary housing. OR <input type="checkbox"/> A telephone call to the provider of temporary housing that is documented, signed, and dated by the case manager making the call OR <input type="checkbox"/> Current HMIS record from homeless housing program, including dates of stay OR <input type="checkbox"/> Self-declaration signed and dated by applicant stating where they are residing. <u>Self-declaration of housing status should be used very rarely and only when written third-party verification cannot be obtained.</u>
	Exiting a system of care	<input type="checkbox"/> Letter signed and dated by system of care representative. Letter must include: <ol style="list-style-type: none"> Statement verifying current stay of household member(s), and Indicate household member(s) have no available housing option after exiting

	Fleeing domestic violence, sexual assault, stalking, etc.	<input type="checkbox"/> Signed and dated self-declaration from individual (complete Self-Declaration form).
At Risk of Becoming Homeless	Losing housing within 14 days	<input type="checkbox"/> Letter signed and dated from the provider of the temporary residence (e.g. homeowner, landlord, motel owner/manager). Letter must include: <ul style="list-style-type: none"> a. Statement verifying the applicant's current living situation, and b. Date when the household must vacate the temporary housing OR <input type="checkbox"/> A telephone call to the provider of temporary housing that is documented, signed, and dated by the case manager making the call OR <input type="checkbox"/> Self-declaration signed and dated by applicant stating where they are residing. <u>Self-declaration of housing status should be used very rarely and only when written third-party verification cannot be obtained.</u>
	Nonpayment of rent or other lease violation	<input type="checkbox"/> Pay or vacate notice or eviction notice. AND <input type="checkbox"/> Copy of lease naming household member as lease holder or other written occupancy agreement identifying them as legal tenant of unit.
	Nonpayment of utilities (see program guidelines for eligibility)	Copy of lease naming household member as lease holder or other written occupancy agreement identifying them as legal tenant of unit AND Utility Shutoff Notice that: <ul style="list-style-type: none"> a. Identifies the household member, and b. Indicates that utility will be shut off or disconnected if payment not received, and c. Is signed and dated by utility company representative and/or includes utility company contact information AND A statement from the provider that without CHHGP assistance, the household will lose their housing and become homeless. Staff must first check that LIHEAP or other utility assistance is not available.

Section 3 - Income Verification and Recertification (all adult household members). Check the box for appropriate documentation at entry and recertification. Enter recertification date as applicable.

Type of Income	Entry	Recert Date:	Recert Date:	Recert Date:	Required Documentation
Wages and Salary Income					Copy of most recent pay stub(s). OR
					Dated mail, fax, or email verification from employer that includes name of employer, client name, pay amount and frequency, average hours worked per week, amount of any additional compensation. OR
					Oral verification from employer that includes name of employer, client name, pay amount and frequency, average hours worked per week, amount of any additional compensation (complete Third Party Oral Verification form. Equivalent case notes may be substituted.). OR
					Self-declaration signed and dated by applicant that includes source of income, income amount, and frequency of income (complete Self-Declaration form). Case manager must document attempts to obtain written and oral verification. Self-declaration for HEN households can be obtained through telephone or email.
Self Employment and Business Income					Copy of most recent federal and state tax return. OR
					Self-declaration that includes source of income, income amount and frequency of income (complete Self-Declaration form). Case manager must document attempts to obtain written and oral verification. Self-declaration for HEN households can be obtained through telephone or email.
Interest and Dividend Income					Copy of most recent interest or dividend income statement. OR
					Copy of most recent federal and state tax return. OR
					Self-declaration that includes source of income, income amount and frequency of income (complete Self-Declaration form). Case manager must document attempts to obtain written and oral verification. Self-declaration for HEN households can be obtained through telephone or email.
Pension/ Retirement Income					Copy of most recent payment statement, benefit notice from Social Security, pension provider or other source. OR
					Dated mail, fax, or email verification from Social Security, pension provider, or other source that includes name of income source and income amount.

					OR Oral verification from source that includes name of income source and income amount (complete Third Party Oral Verification form. Equivalent case notes may be substituted.).
					OR Self-declaration signed and dated by applicant that includes source of income, income amount, and frequency of income (complete Self-Declaration form). Case manager must document attempts to obtain written and oral verification. Self-declaration for HEN households can be obtained through telephone or email.
Unemployment and Disability Income					Copy of most recent payment statement or benefit notice. OR Dated mail, fax, or email verification from unemployment administrator or workers compensation administrator of former employer that includes name of income source and income amount. OR Oral verification from source that includes name of income source and income amount (complete Third Party Oral Verification form. Equivalent case notes may be substituted.). OR Self-declaration signed and dated by applicant that includes source of income, income amount, and frequency of income (complete Self-Declaration form). Case manager must document attempts to obtain written and oral verification. Self-declaration for HEN households can be obtained through telephone or email.
TANF/ Public Assistance					Copy of most recent payment statement, benefit notice, or Department of Social and Health Services (DSHS) Benefits Verification System (BVS). OR Oral verification from source that includes name of income source and income amount (complete Third Party Oral Verification form. Equivalent case notes may be substituted.). OR Self-declaration signed and dated by applicant that includes source of income, income amount, and frequency of income (complete Self-Declaration form). Case manager must document attempts to obtain written and oral verification.
Alimony, Child Support, Foster Care Payments					Copy of most recent payment statement, notices, or orders. OR Dated mail, fax, or email verification from child support enforcement agency, court liaison, or other source that includes name of income source and income amount. OR Oral verification from source that includes name of income source and income amount (complete Third Party Oral Verification form). OR

					<p>Self-declaration signed and dated by applicant that includes source of income, income amount, and frequency of income (complete Self-Declaration form). Case manager must document attempts to obtain written and oral verification.</p> <p>Self-declaration for HEN households can be obtained through telephone or email.</p>
Armed Forces Income					<p>Copy of pay stubs, payment statement, or other government issued statement indicating income amount.</p> <p>OR</p> <p>Dated mail, fax, or email verification from child support enforcement agency, court liaison, or other source that includes name of income source and income amount.</p> <p>OR</p> <p>Oral verification from source that includes name of income source and income amount (complete Third Party Oral Verification form).</p> <p>OR</p> <p>Self-declaration signed and dated by applicant that includes source of income, income amount, and frequency of income (complete Self-Declaration form). Case manager must document attempts to obtain written and oral verification.</p> <p>Self-declaration for HEN households can be obtained through telephone or email.</p>
No Income					<p>Self-declaration signed and dated by applicant that includes source of income, income amount, and frequency of income (complete Self-Declaration form).</p> <p>Self-declaration for HEN households can be obtained through telephone or email.</p>

Section 4 - Eligible Children Verification:

Eligible Children Status	Visual Verification	Oral Verification (Complete Third Party Oral Verification form)	Written Verification Attach written documentation produced by third- party or document such as legal proof of emancipation, birth certificate, D.O.L. ID card, court document, high school documentation, etc. <i>(Note: Social Security cards are not acceptable documentation since they do not indicate age.)</i>
Children under 18 or pregnancy	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Adult children ages 18-20 living at home		<input type="checkbox"/>	<input type="checkbox"/>
Temporarily absent youth		<input type="checkbox"/>	<input type="checkbox"/>
Emancipated Youth		<input type="checkbox"/>	<input type="checkbox"/>

Section 5 – Signature:

Name of person completing form	
Date form completed	

26.4 CHHGP Documentation of Third Party Oral Verification

☐ Homelessness

☐ Income (need name of employer, client name, pay amount and frequency, average hours worked per week, amount of any additional compensation)

Client Name	
HMIS Client Identifier	
Date	
Discussion	
Name of Third Party Verifier	
Position/Title	
Telephone	
Organization/Agency	

26.5 CHHGP Self-Declaration

- ☐ Homelessness
- ☐ Income (need source of income, income amount, and frequency of income)

Client Name	
HMIS Client Identifier	
Date	
Client Narrative	
Client Signature	

26.6 CHGP Income Eligibility Worksheet Instructions

1. Enter client name, source of income, gross amount and annualization factor in shaded area of form (one income source per line). See page 6 of the CHG Guidelines for detail on annualization of income different income sources.

2. Using the dropdown menu (cell B42), select the HUD AMI Range for the household (50% AMI for homeless household with children; 30% AMI for homeless households without children; 30% AMI for at risk households with or without children)

3. Enter the HUD Income Limits based on location, AMI range, and family size from the HUD website (click link to the right)

4. Household eligibility will be displayed here.

CHG Income Eligibility Worksheet				
Department of Social and Health Services (DSHS) Benefits Verification System (BVS) print out is acceptable for any form of income <u>in lieu of</u> other income documentation. IF BVS documentation is not available, follow the income definition and documentation standards below.				
What is counted as income? Income includes the current (not projected) gross <u>annualized</u> income of all adult (18 years and older) household members and unearned income attributable to a minor.				
The definition of income reflects a household's income at the time they are seeking assistance. Accordingly, documents and information collected to verify income should be recent. Documentation dated within 30 days is acceptable. However, for public assistance benefits (e.g. SSI, food stamps, etc.), a benefits statement received any time within the twelve months prior to the time of application and reflecting current benefits received by a household is allowed. The following types of inclusions must be counted when calculating current gross income:				
<ul style="list-style-type: none"> Earned income Self-employment/business income Interest & dividend income Pension / retirement income Unemployment and disability income TANF / public assistance Alimony Child support Foster care Armed forces 				
Annualized Wages and Periodic Payments When calculating 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. Annualize the income using the following methods:				
<ul style="list-style-type: none"> Hourly wage multiplied by hours worked per week multiplied by 52 weeks Weekly wage multiplied by 52 weeks Biweekly wage (every other week) multiplied by 26 bi-weekly periods Semi-monthly wage (twice a month) multiplied by 24 semi-monthly periods Monthly wage multiplied by 12 months 				
Household member name	Source of Income	Gross amount	Annualization Factor	Annual Income
Example: John Smith	TANF	\$339	12	\$ 4,068.00
1				\$ -
2				\$ -
3				\$ -
4				\$ -
5				\$ -
6				\$ -
7				\$ -
8				\$ -
Choose income limit (use dropdown menu)		Total Annual Household Gross Income: \$ -		
		Enter HUD Limits		
Eligibility not determined				
Attach BVS or Income Documentation to this Worksheet				

Important! To use the form for the next household, delete the AMI range selection and the HUD Income Limit BEFORE adding new household income data!

26.7 Landlord Habitability Standards Certification Form

Rental Address _____

Client/Tenant Name _____

I, as landlord /owner/lessor/sub lessor or designated representative, of the above address, certify that the above unit meets the provisions outlined in Landlord Tenant Act (RCW 59.18.060) attached. Failure to comply with state law may result in termination of rental assistance payments.

Landlord / Owner Signature _____

Landlord / Owner Name Printed _____

Phone _____

Date _____

(Insert your agency name here) reserves the right to visually inspect any unit receiving rental assistance payments to review compliance with this certification and a lead based paint inspection if the household composition changes and a child 6 or under occupies the home.

Definitions

"Landlord" means the owner, lessor, or sub lessor of the dwelling unit or the property of which it is a part, and in addition means any person designated as representative of the owner, lessor, or sub lessor including, but not limited to, an agent, a resident manager, or a designated property manager.

RCW 59.18.060

Landlord — Duties

The landlord will at all times during the tenancy keep the premises fit for human habitation, and shall in particular:

- (1) Maintain the premises to substantially comply with any applicable code, statute, ordinance, or regulation governing their maintenance or operation, which the legislative body enacting the applicable code, statute, ordinance or regulation could enforce as to the premises rented if such condition endangers or impairs the health or safety of the tenant;
- (2) Maintain the structural components including, but not limited to, the roofs, floors, walls, chimneys, fireplaces, foundations, and all other structural components, in reasonably good repair so as to be usable;
- (3) Keep any shared or common areas reasonably clean, sanitary, and safe from defects increasing the hazards of fire or accident;
- (4) Provide a reasonable program for the control of infestation by insects, rodents, and other pests at the initiation of the tenancy and, except in the case of a single-family residence, control infestation during tenancy except where such infestation is caused by the tenant;
- (5) Except where the condition is attributable to normal wear and tear, make repairs and arrangements necessary to put and keep the premises in as good condition as it by law or rental agreement should have been, at the commencement of the tenancy;
- (6) Provide reasonably adequate locks and furnish keys to the tenant; maintain and safeguard with reasonable care any master key or duplicate keys.
- (7) Maintain all electrical, plumbing, heating, and other facilities and appliances supplied by him or her in reasonably good working order;
- (8) Maintain the dwelling unit in reasonably weather tight condition;
- (9) Except in the case of a single-family residence, provide and maintain appropriate receptacles in common areas for the removal of ashes, rubbish, and garbage, incidental to the occupancy and arrange for the reasonable and regular removal of such waste;
- (10) Provide facilities adequate to supply heat and water and hot water as reasonably required by the tenant;
- (11)(a) Provide a written notice to all tenants disclosing fire safety and protection information. The landlord or his or her authorized agent must provide a written notice to the tenant that the dwelling unit is equipped with a smoke detection device as required in RCW 43.44.110. The notice shall inform the tenant of the tenant's responsibility to maintain the smoke detection device in proper operating condition and of penalties for failure to comply with the provisions of RCW 43.44.110(3). The notice must be signed by the landlord or the landlord's authorized agent and tenant with copies provided to both parties. Further, except with respect to a single-family residence, the written notice must also disclose the following:
 - (i) Whether the smoke detection device is hard-wired or battery operated;
 - (ii) Whether the building has a fire sprinkler system;
 - (iii) Whether the building has a fire alarm system;
 - (iv) Whether the building has a smoking policy, and what that policy is;
 - (v) Whether the building has an emergency notification plan for the occupants and, if so, provide a copy to the occupants;
 - (vi) Whether the building has an emergency relocation plan for the occupants and, if so, provide a copy to the occupants; and
 - (vii) Whether the building has an emergency evacuation plan for the occupants and, if so, provide a copy to the occupants.
- (b) The information required under this subsection may be provided to a tenant in a multifamily residential building either as a written notice or as a checklist that discloses whether the building has fire safety and protection devices and systems. The checklist shall include a diagram showing the emergency evacuation routes for the occupants.

(c) The written notice or checklist must be provided to new tenants at the time the lease or rental agreement is signed;

(12) Provide tenants with information provided or approved by the department of health about the health hazards associated with exposure to indoor mold. Information may be provided in written format individually to each tenant, or may be posted in a visible, public location at the dwelling unit property. The information must detail how tenants can control mold growth in their dwelling units to minimize the health risks associated with indoor mold. Landlords may obtain the information from the department's web site or, if requested by the landlord, the department must mail the information to the landlord in a printed format. When developing or changing the information, the department of health must include representatives of landlords in the development process. The information must be provided by the landlord to new tenants at the time the lease or rental agreement is signed;

(13) The landlord and his or her agents and employees are immune from civil liability for failure to comply with subsection (12) of this section except where the landlord and his or her agents and employees knowingly and intentionally do not comply with subsection (12) of this section; and

(14) Designate to the tenant the name and address of the person who is the landlord by a statement on the rental agreement or by a notice conspicuously posted on the premises. The tenant shall be notified immediately of any changes in writing, which must be either (a) delivered personally to the tenant or (b) mailed to the tenant and conspicuously posted on the premises. If the person designated in this section does not reside in the state where the premises are located, there shall also be designated a person who resides in the county who is authorized to act as an agent for the purposes of service of notices and process, and if no designation is made of a person to act as agent, then the person to whom rental payments are to be made shall be considered such agent. Regardless of such designation, any owner who resides outside the state and who violates a provision of this chapter is deemed to have submitted himself or herself to the jurisdiction of the courts of this state and personal service of any process may be made on the owner outside the state with the same force and effect as personal service within the state. Any summons or process served out-of-state must contain the same information and be served in the same manner as personal service of summons or process served within the state, except the summons or process must require the party to appear and answer within sixty days after such personal service out of the state. In an action for a violation of this chapter that is filed under chapter 12.40 RCW, service of the notice of claim outside the state must contain the same information and be served in the same manner as required under chapter 12.40 RCW, except the date on which the party is required to appear must not be less than sixty days from the date of service of the notice of claim.

No duty shall devolve upon the landlord to repair a defective condition under this section, nor shall any defense or remedy be available to the tenant under this chapter, where the defective condition complained of was caused by the conduct of such tenant, his or her family, invitee, or other person acting under his or her control, or where a tenant unreasonably fails to allow the landlord access to the property for purposes of repair. When the duty imposed by subsection (1) of this section is incompatible with and greater than the duty imposed by any other provisions of this section, the landlord's duty shall be determined pursuant to subsection (1) of this section.

26.8 Housing Habitability Standards (HHS) Form (Including Lead-based Paint Visual Assessment)

Eligible Client/Household Name: _____

Housing unit address inspected: _____ City: _____ Zip: _____

Number of bedrooms: _____

Was the unit built before 1978: _____

Will there be a child under the age of six or a pregnant woman living in the unit? _____

If the unit was built before 1978 and a child under age six or a pregnant woman is, or will be, living in the unit, then a lead-based paint visual assessment is required. See question # 11.

Unit Type:

- ☐ Single Family
 ☐ Duplex
☐ Mobile Home
 ☐ Multi-Family Apartment
☐ Single Room Occupancy
 ☐ Condo

Inspection Date: _____

Inspector Name: _____

Inspector Signature: _____

Instructions: The property must meet all elements in order to pass.

Inspector Initials	Element
	1. <i>Structure and materials:</i> The structure is structurally sound and protects residents from the elements and does not pose any threat to the health and safety of the residents.
	2. <i>Space and security:</i> Each resident is provided adequate space and security for themselves and their belongings. Each resident is provided an acceptable place to sleep.
	3. <i>Interior air quality:</i> Each room or space has a natural or mechanical means of ventilation. The interior air is free of pollutants at a level that might threaten or harm the health of residents.
	4. <i>Water supply:</i> The water supply is free from contamination.
	5. <i>Sanitary facilities:</i> Residents have access to sufficient sanitary facilities that are in proper operating condition, are private, and are adequate for personal cleanliness and the disposal of human waste.

	6. <i>Thermal environment</i> : The housing has necessary heating/cooling facilities in proper operating condition.
	7. <i>Illumination and electricity</i> : The structure has adequate natural or artificial illumination to permit normal indoor activities and support health and safety. There are sufficient electrical sources to permit the safe use of electrical appliances in the structure.
	8. <i>Food preparation</i> : All food preparation areas contain suitable space and equipment to store, prepare, and serve food in a safe and sanitary manner.
	9. <i>Sanitary conditions</i> : The housing is maintained in a sanitary condition.
	<p>10. <i>Fire and Carbon Monoxide safety</i>:</p> <ul style="list-style-type: none"> • There is a second means of exiting the building in the event of fire or other emergency. • Each has at least one battery-operated or hard-wired smoke detector and a carbon monoxide (CO) alarm in proper working condition, on each occupied level of the unit. Smoke detectors are located, to the extent practicable, in a hallway adjacent to a bedroom. If the unit is occupied by hearing-impaired persons, smoke detectors have an alarm system designed for hearing-impaired persons in each bedroom occupied by a hearing-impaired person. • The public areas of all housing are equipped with a sufficient number, but not less than one for each area, of battery-operated or hard-wired smoke detectors. Public areas include, but are not limited to, laundry rooms, community rooms, day care centers, hallways, stairwells, and other common areas.
	11. <i>Lead-based paint visual assessment (if applicable)</i> : Unit contains no deteriorated paint. If the unit contains deteriorated paint it has been properly stabilized and repaired. (If not applicable, indicate N/A.)

26.9 Certification of Payment Obligation / Potential Eviction from Friend/Family

Applicant Information

Name: _____

Phone: _____ Email: _____

Address where applicant is staying, or will stay if applicant is homeless and moving in with friend/family:

Street/Apt # _____

City _____ State _____ Zip code _____

Certification by Applicant

☐ Applicant already lives with friend/family ☐ Applicant is moving in with friend/family

I confirm my payment obligation is/will be \$_____ each ☐ week ☐ month to friend/family shown below.

Applicant / Client Signature *Date*

Friend/Family Information

Name: _____

Phone: _____ Email: _____

Rent amount paid each ☐ week ☐ month by applicant: _____

If currently living with friend/family, beginning date Applicant has been living at this address: _____

Type of Agreement: ☐ Lease/sub lease ☐ Month-to-Month / Length of Agreement _____

Complete address where payment should be sent: _____

Street Apt. #

City _____ State _____ Zip code _____

Depending on Applicant's current housing status, complete # 1 OR # 2 below

1. Certification by Friend / Family that they will evict applicant who is currently living with them

I certify that I am currently accepting a ☐ weekly ☐ monthly rent payment of \$_____ from _____ (applicant). I certify that I will evict _____ (applicant) within 14 days if I do not receive the following payment(s):

☐ back rent for the months of _____

and/or

☐ future monthly payments.

I certify that I provide safe and habitable housing to applicant as a friend/family. I am not in the business of rental real-estate.

Friend/Family Signature *Date*

2. Certification by Friend/Family that homeless applicant will move in with them

I certify that I will accept payment of \$_____ to provide housing for _____ (applicant). I certify that I will provide safe and habitable housing to applicant as a friend/family. I am not in the business of rental real-estate.

Friend/Family Signature *Date*

26.10 Utility Assistance to Prevent Homelessness

If you are supporting an eligible client with CHHGP utility assistance, the following is required:

☐ Copy of lease naming client as lease holder or other written occupancy agreement identifying them as legal tenant of unit

AND

☐ Utility shut off notice identifying the client, indicating that utility will be shut off or disconnected if payment is not received, and is signed and dated by utility company representative and/or included utility company contact information

AND

☐ Statement from case manager indicating that without CHHGP assistance the client will lose their housing and become homeless

Use the space below to explain how CHHGP utility assistance is necessary to keep the client from becoming homeless. What are the client's support networks (friends/family/church), other housing options or resources that are not available? Why isn't LIHEAP or another utility assistance program supporting the client's utility needs?

Client Name and HMIS Client Identifier	

**Reference to Appendix A Housing Status Documentation Standards*

		Needs Assessment		Stability Plan			
		Identify barriers to obtaining permanent housing	Identify barriers to maintaining permanent housing	Rent subsidy schedule	Services and referrals addressing barriers identified in assessment	Housing and self-sufficiency goals	Action steps and completion dates
Homeless	Congregate Living Facility up to 24 months						
	Single-household units, <90 days	✓	✓		✓	✓	✓
	Single-household units, ≥ 90 days and up to 24 months	✓	✓		✓	✓	✓
	Rent Assistance	✓	✓	✓	✓	✓	✓
At Risk	Rent Assistance		✓	✓	✓	✓	✓

28 **Appendix J: Rent Reasonableness Documentation Standards** (Adapted from HUD's Homeless Prevention Rapid Re-Housing Grant Guidelines)

Determining and Documenting Rent Reasonableness

Determining and documenting rent reasonableness is required under CHHGP. It is up to the Sub Grantees to determine exactly what documentation is required in order to ensure the rent reasonableness standard is met.

Sub Grantees should determine rent reasonableness by considering: “(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 the rent charged to other units owned.”

Rent Reasonableness Forms and/or Data Sources

Sub Grantees must outline requirements for documenting comparable rents and may include specific forms and/or required data sources that must be included in the client file. A common form to collect data on program units will make the data collection process easier. Examples of forms and data resources include:

- ✓ The Rent Reasonableness Checklist and Certification, available at www.hud.gov/offices/cpd/affordablehousing/library/forms/rentreasonablechecklist.doc, or other similar forms developed locally;
- ✓ Other documentation, such as copies of newspaper advertisements, internet listings, or published rental data sources; and

Printouts of records from the Sub Grantees rental housing database (including www.housingsearchnw.org).

Tip: The Rent Reasonable Checklist is a sample form that is used across different housing programs, and as such, includes some concepts and terms that are not applicable to CHHGP.

Components of an Effective Policy

CHHGP expects that the Sub Grantee have established a rent reasonableness policy to ensure that rent reasonableness determinations and documentations are defensible, transparent and consistent across their program. At a minimum, an effective policy includes a methodology, documentation requirements, staffing, and strategies for addressing special circumstances.

Policies should provide step-by-step guidance on how comparisons should be made and what documentation should be included in the case file, including any notes from the

staff person making the determination. For example, Sub Grantees could create a policy where a provider must consider three units, but the rent paid must be within \$50 of the average comparable rents. In this example, a rent paid could actually be slightly higher than any of the individual comparable units, which would be fine according to the Sub Grantee policy.

Methodology

Methodologies for obtaining comparable rents include (but are not limited to):

- ✓ Using a market analysis or other published data to determine the appropriate rent ranges for units of different sizes, types, locations, and amenities;
- ✓ Obtaining documentation from property owners/managers on current rents charged in comparable unassisted units;
- ✓ Obtaining comparable rents on a unit-by-unit basis and requiring a check of, for example, at least 3 other units; or
- ✓ A combination of these methodologies.

Strategy for Addressing Special Cases

There will be instances where the methodology and process adopted by Sub Grantee is not sufficient to establish rent reasonableness for a particular unit. For example, staff may find that the rental housing database they are required to use does not have comparables for units with 6+ bedrooms. Similarly, rural areas may only find 1 or 2 comparable units instead of the 3 units specified by their protocols. The Sub Grantee policies should outline how to address these situations and the documentation required in these cases. For example, the policy could allow staff to analyze the impact of an extra bedroom on rent for a particular area and calculate a reasonable rent based on their analysis.

Similarly, staff in rural areas may need to either expand the geographic area used to search for comparables and/or establish rent reasonableness on the basis of fewer comparable units.

Again, the documentation in the case files should contain complete documentation, and should outline staff steps, analysis, and conclusions so that an auditor or supervisor can understand the factors that contributed to the determination.

Sources of Rental Housing Data

Regardless of the methodology used to determine rent reasonableness Sub Grantees should already be aware of sources of rental housing data to use in establishing comparable rents.

Public Sources of Data

There may be organizations within the grantee state, county, or city that collect and aggregate data on the rental housing stock, such as a State or local Public Housing Authority (PHA) or the local Chamber of Commerce.

Real Estate Advertisements and Contacts

Ads in newspapers or online are simple ways to find comparable rents. The following are potential sources of information:

- ✓ Newspaper ads (including internet versions of newspaper ads);
- ✓ Weekly or monthly neighborhood or shopper newspapers that have rental listings;
- ✓ “For Rent” signs in windows or on lawns;
- ✓ Real estate agents; and
- ✓ Property management companies that handle rental property.
- ✓ Rental Listing websites including www.housingsearchnw.org, www.apartmentguide.com, www.apartments.com, www.forrentmag.com, <http://www.move.com/apartments/main.aspx>, and www.apartmentlist.com

Rental Market Studies and Surveys

- ✓ *A Rental Market Study* is an in-depth analysis of a particular rental market. These are often prepared by independent organizations for specific communities. Also, commercial firms will frequently conduct these studies before developing rental housing in a particular location. Rental market studies can provide a good source of data upon which to base a rent reasonableness policy. Appraisals of particular properties and market studies for these properties are also useful in establishing comparable rents, but they are generally prepared by certified real estate appraisers or researchers and are both time-consuming and expensive.
- ✓ *A Rental Market Survey* is a survey of various landlords and property management companies in the area. Some local governments conduct surveys to assist with planning activities. Additionally, local associations of rental owners and managers may survey their members periodically and publish the results. Many of these surveys report average rents and/or rent ranges by bedroom category and submarket location. However, such surveys frequently do not have all the detailed information required for rent reasonableness comparisons.

When deciding whether to use a study or a survey, it is important to note that many rental market surveys are designed to show the overall picture of the rental market and may not be very useful in evaluating the rent for a particular unit type. On the other hand, a rental market study may be narrowly focused on a particular type of rental housing and might be useful only for certain housing units assisted.

Tip: When using either a market study or a market survey, it is very important to understand what is and is not included in the rent reported. Some surveys/studies report rents with all utilities included, some without utilities included, and others with only the most typical set of utilities included. When comparing unassisted units with CHHGP-assisted units, it is important to consider whether utilities and other amenities are included.

Rental Database

Some Sub Grantees have found it useful to build a rental database for CHHGP, in order to search for comparable rents more efficiently. Building a rental database allows the majority of work to be completed on the front end, which eases the rent reasonableness determination and allows assistance to be provided more quickly. The Housing Search NW database is available to all communities in Washington State. In any given community, there may or may not be sufficient data in the system to provide accurate comparisons. Contact the City of Spokane for more information about Housing Search NW, including access to the Rent Comparison Tool.

Data in Rural Areas

While there may be fewer rental units in rural areas than in urban and suburban areas, it is possible to find comparable rents or establish rent payment standards for different unit types located in these areas.

- ✓ One source of rental housing data for rural areas may be the US Department of Agriculture's Rural Development Agency. USDA provides direct and guaranteed loans for single and multi-family housing development in rural areas as well as for farm laborers. Contact information for Rural Development State and Local Offices or USDA Service Centers is available at http://www.rurdev.usda.gov/recd_map.html. Each Rural Development Office, if it has a Rural Housing component, should have information on the types of rental housing available in various communities throughout the state, as well as unit sizes and rents.
- ✓ Some rural communities are also under the jurisdiction of Public Housing Authorities (PHAs). In these cases, the PHA may be a source of comparable rent data.
- ✓ Another potential source of comparable rent data are real estate agents. Local real estate agents are not only knowledgeable about real estate prices but often are a source of information on rental housing in the area. They may be able to

extrapolate rent comparables based on the general cost of housing in the area. To find real estate agents active in particular communities, Sub Grantees can consult the National Association of Realtors on the web at <http://www.realtor.org/>. For demographic information on the housing stock, market trends, etc., Grantees should access <http://www.realtor.org/research>.

Childhood lead poisoning is a major environmental health problem in the United States, especially for low-income families in poor living conditions. If not detected early, children with high levels of lead in their bodies can suffer from damage to the brain and nervous system, behavioral and learning problems (such as hyperactivity), slowed growth, hearing problems, and headaches. To prevent lead-poisoning in young children, Sub Grantees 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

Disclosure requirements are triggered for ALL properties constructed prior to 1978. These requirements require that lessors (property owners or managers) 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:

<http://www.hud.gov/offices/lead/enforcement/disclosure.cfm>

While this actually relates to property owners/managers, sharing this information with their tenants (or ensuring they have received it) is an easy thing to do. This is an important opportunity to educate households about the potential hazards related to lead and their rights as tenants. Informed tenants are more likely to watch for potential problems in their home and proactively work with landlords to address any issues.

Determining the Age of the Unit

Sub Grantees 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. In most areas, these records are available online. If you are uncertain where to find this information, a quick internet search should help you locate the data you need. In the search field, try combining your county name with one of the following phrases:

- ✓ “property tax records”
- ✓ “property tax database”
- ✓ “real property sales”

Remember to print out a copy of the screenshot for the case file. If you have trouble finding this information online, contact your local Office of Tax and Revenue for assistance. If not available online, the information is public and can be requested from the local authorities. (Note, the taxing authority and the assessment entity may be separate governmental entities and office names vary by locality).

Conducting a Visual Assessment

Visual assessments are only triggered under certain circumstances:

- ✓ The leased property was constructed before 1978;
- AND*
- ✓ A child under the age of six will be living in the unit occupied by the household receiving CHHGP rent assistance.

A visual assessment must be conducted prior to providing CHHGP rent assistance to the unit and on an annual basis thereafter (as long as assistance is provided). Visual assessments must be conducted by a HUD-Certified Visual Assessor. It is important to note that a HUD-Certified Visual Assessor is not equivalent to a Certified Clearance Examiner. 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>

The training teaches individuals how to identify deteriorated paint and how deteriorated paint must be treated. Sub Grantees may choose to have their program staff complete the visual assessments or they may procure services from a contractor.

If a visual assessment reveals problems with paint surfaces, Sub Grantees cannot approve the unit for CHHGP assistance until the deteriorating paint has been repaired. At this point, Sub Grantees must make a decision: work with the property owner/manager to complete needed paint stabilization activities and clearance, work with the household to locate a different (lead-safe) unit, or refer the household to a different program if CHHGP assistance cannot be provided.

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 <http://cfpub.epa.gov/flpp/> and click on "certified abatement/inspection firms."

Lead professionals, training providers, and HUD-sponsored Lead Safe Work Practices training listings can be accessed at www.leadlisting.org or 1-888-LEADLIST.

For more information on the Federal training and certification program for lead professionals, contact the National Lead Information Center (NLIC) at <http://www.epa.gov/lead/pubs/nlic.htm> or 1-800-424-LEAD to speak with an information specialist.

The Lead Safe Housing Rule as well as a HUD training module to help recipients of funds effectively implement the requirements of the Lead Safe Housing Rule in their programs can be accessed at <http://www.hud.gov/offices/cpd/affordablehousing/training/web/leadsafe/>

Permanent Supportive Housing

Long-term housing that provides supportive services for homeless persons with disabilities. This type of supportive housing enables special needs populations to live as independently as possible in a permanent setting. The supportive services may be provided directly by the Lead Grantee or Sub Grantee. The supportive services provided in connection with a project shall address the special needs of individuals (such as homeless persons with disabilities and homeless families with children) intended to be served by a project. To require or not to require resident participation is within the discretion of the Sub Grantees. Permanent housing can be provided in one structure or several structures at one site or in multiple structures at scattered sites (see the HUD SHP desk guide - [Program Component 2: Permanent Housing for Homeless Persons with Disabilities.](#))

Disability

Person with disabilities means a household composed of one or more persons at least one of whom is an adult who has a disability.

- ✓ A person shall be considered to have a disability if he or she has a disability that:
 - Is expected to be long-continuing or of indefinite duration;
 - Substantially impedes the individual's ability to live independently;
 - Could be improved by the provision of more suitable housing conditions; and
 - Is a physical, mental, or emotional impairment, including an 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 a developmental disability, as defined in this section.
- ✓ A person will also be considered to have a disability if he or she has acquired Immunodeficiency syndrome (AIDS) or any conditions arising from the etiologic agent for 86 acquired immunodeficiency syndrome, including infection with the human immunodeficiency virus (HIV).
- ✓ Notwithstanding the preceding provisions of this definition, the term person with disabilities includes, except in the case of the SRO component, two or more persons with disabilities living together, one or more such persons living with another person who is determined to be important to their care or well-being, and

the surviving member or members of any household described in the first sentence of this definition who were living, in a unit assisted under this part, with the deceased member of the household at the time of his or her death. (In any event, with respect to the surviving member or members of a household, the right to rental assistance under this part will terminate at the end of the grant period under which the deceased member was a participant.)

Developmental Disability [as defined in section 102 of the Developmental Disabilities Assistance and Bill of Rights Act of 2000 (42 U.S.C. 15002)]

- ✓ A severe, chronic disability of an individual that—
 - Is attributable to a mental or physical impairment or combination of mental and physical impairments;
 - Is manifested before the individual attains age 22;
 - Is likely to continue indefinitely;
 - Results in substantial functional limitations in three or more of the following areas of major life activity (self-care, receptive and expressive language, learning, mobility, self-direction, capacity for independent living, economic self-sufficiency); and
 - Reflects the individual's need for a combination and sequence of special, interdisciplinary, or generic services, individualized supports, or other forms of assistance that are of lifelong or extended duration and are individually planned and coordinated.
- ✓ An individual from birth to age 9, inclusive, who has a substantial developmental delay or specific congenital or acquired condition, may be considered to have a developmental disability without meeting three or more of the criteria described in paragraphs (1)(i) through (v) of the definition of “developmental disability” in this section if the individual, without services and supports, has a high probability of meeting those criteria later in life.

(See **Homeless Emergency Assistance and Rapid Transition to Housing: Defining “Homeless” – Final Rule.**)