

# Mason County Homeless Response System Written Standards

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## Overview

Mason County Public Health and Human Services (MCPHHS) administers local, state, and federal funds to support a homeless crisis response system throughout Mason County. While these funds are a critical resource in the crisis response system, individual organizations may contribute to this system through various grants secured independently or through their own organizational fundraising. All information that is entered into the Homeless Management Information System (HMIS) database is governed by the Department of Commerce and local governments are accountable to the data quality and outcomes.

This document is meant to provide an overview of the Homeless Crisis Response System and provide system-level guidance. This document also guides the overall use of funds that support the homeless crisis response system throughout Mason County. MCPHHS has adopted the Consolidated Homeless Guidelines as the policy and procedure document for Mason County's homeless crisis response system. These guidelines specify program eligibility requirements, allowable expenses, HMIS data standards, client file documentation and program operational expectations that will also govern the use of local document recording fees. In this document, MCPHHS will expand on and emphasize components of the Homeless Crisis Response System that will enhance program design and clarify program expectations and best practices to achieve the desired outcomes. The contractor's role is to implement the program as designed according to grant guidelines, technical assistance provided, and best practices. This includes the intent of the program as not all guidelines can account for every nuance. The county will provide technical assistance to aid in meeting program fidelity.

Funding is provided to provide the framework and design for a homeless crisis response system. It is recognized that the funding referenced in this document is not sufficient to meet every need to prevent and end homelessness. When we view the entire homeless response system, it takes many partnerships and fund sources to make a complete system that can rapidly respond to people experiencing or at-risk of experiencing homelessness. The overarching goal is to make homelessness rare, brief, and one-time. We expect all subcontractors to be leaders in the crisis response system, to facilitate partnerships with organizations within and outside of the county and promote evidence-based best practices. We are here to support these efforts from developing strategic plans, action plans, technical assistance, and to providing support in training employees.

These written standards will be updated as necessary throughout the grant period. Subgrantees need to stay in communication about changes to your program's funding, interventions, scope of service, or population served. Mason County is responsible for updating the Department of Commerce on such changes.

## Vision and Priorities

Vision: **No person left living outside**

Homeless Crisis Response System Priorities:

- **Quickly identify** and engage people experiencing homelessness under the state definition, and all unaccompanied youth under any federal definition, through outreach and coordination between every system that encounters people experiencing homelessness.
- **Prioritize** housing for people with the greatest need.
- Operate an effective and efficient homeless crisis response system that swiftly moves people into stable **permanent housing**.
- Address **racial disparities** among people experiencing homelessness.

It is important to note that this document summarizes guiding principles, a vision for the whole homeless crisis response system, an explanation of the fund sources and an overview of the allowable activities. It is not intended to replace the Department of Commerce Grant Guidelines, RCW requirements of the funding or any applicable federal, state, or local laws.

## Funding Sources

Recognizing the seriousness of the homeless crisis, the Washington State Legislature passed the Homeless Housing and Assistance Act (Chapter 43.185C RCW) in 2005 (the “Act”). The Act, along with legislation, allows the collection of surcharges on documents recorded for the sale and/or transfer of real property to fund homeless programs. The document recording surcharge funds (“surcharge funds”) are used by the state and local government agencies to reduce homelessness (RCW 36.22.179). Mason County reserves the right to determine which fund source will fund the awarded programs and if funds will be braided to be able to support the program. Agencies receiving awards from multiple fund sources may have more reporting and grant guideline requirements.

These funds are more commonly referred to and explained as follows:

### **Consolidated Homeless Grant Program**

The Consolidated Homeless Grant Program (CHG) is administered by the Department of Commerce and has several fund sources, including state general fund and document recording fees. Counties subgrant these funds to support a homeless crisis response system. These funds are governed by the “Guidelines for the Consolidated Homeless Grant”. These funds support administration, operations, rent, and facilities support for such programming as emergency shelters, transitional housing, rapid re-housing, permanent supportive housing, street outreach, diversion, coordinated entry, homeless prevention, and data collection and reporting. As a recipient of these funds, Mason County is responsible for operating a homeless crisis response system throughout the county and for all projects that enter data into HMIS.

## **Local Document Recording Fees (RCW 36.22.179): Homeless Housing and Assistance (“2163”)**

The local document recording fees are obtained through an imposed surcharge on document recording fees of real property, dedicating funding to low-income and very-low-income individuals.

The Homeless Housing Grant Program was created in Washington State by Engrossed Second Substitute House Bill (ESSHB) 2163 on August 1, 2005. The law created a document recording fee on certain documents to be utilized by local jurisdictions to reduce homelessness.

Administration of the grant funds are shared between local governments and the state. Eligible uses of the funds are to provide housing and shelter for homeless people including, but not limited to: Grants to operate, repair, and staff shelters; grants to operate transitional housing; partial payments for rental assistance; consolidated emergency assistance; overnight youth shelters; grants and vouchers designated for victims of human trafficking and their families; and emergency shelter assistance; and fund the homeless housing grant program.

Mason County aligns with the Consolidated Homeless Grant Guidelines when administering funds to support the homeless crisis response system. Grantees should become familiar with the allowable expenses, principles, performance outcomes and intervention types within these grant guidelines.

Treatment Sales Tax (TST): RCW 82.14.460 is a Sales and Use Tax to support Therapeutic Courts and a coordinated treatment system of care including housing. A small portion of this fund contributes rental assistance to persons in a coordinated treatment program according to the RCW.

## **Preventing Duplication of Benefits**

All subcontractors must establish and maintain adequate procedures to prevent any duplication of benefits with allocated funds. “Duplication of benefits” occurs when an individual or household receives financial assistance for the same service from multiple funding sources. Grantees must determine and document if the household is receiving assistance from other sources (e.g. philanthropy, faith-based, CDBGCV, CHG, etc.) to avoid duplication of benefits as well as verify that the other form of assistance does not disqualify the eligibility of the individual or household. When two or more funding sources are used the funds must not cover the same item and the total assistance provided must not exceed the need.

To avoid possibilities that an individual or household receives financial assistance for the same service, during the same time frame, from multiple funding sources subcontractors will have policies and procedures in place that account for the following:

- Establish documentation procedures: For example, upon intake and eligibility determination the subcontractor will document assistance the household is receiving by funding sources whether donated or through grants and contracts. Proper documentation is aimed at avoiding duplication of benefits and/or disqualification of the household from assistance.
- Order of priority of funding sources: A subcontractor may reference any checklists or forms used to evaluate if the household is receiving assistance from other sources.
  - Best practice: adopt checklists that reflect the order

- Targeted household types served.
- Length of stay for each funding source.
- During re-evaluation, the subcontractor will cross-reference forms, checklists, and institute questions to assess if the program participant is receiving additional funds to ensure duplication is not occurring.

Any additional sources of financial assistance and services provided to a household must be documented, and a determination must be made that there is no duplication of benefits.

## Guiding Principles & Best Practices

MCPHHS is committed to making homelessness rare, brief, and one-time with all efforts dedicated to eliminating homelessness within subpopulations. We support Washington States vision that “**no person is left living outside**”. We believe this is possible when all organizations respond as leaders, work collaboratively as a team, and pursue other available funds as able to help build the necessary components of the homeless response system to prevent and end homelessness. We value innovative approaches and resourcefulness when faced with challenges.

As leaders, subcontractors must respond to the disproportionate access to services, service provision and outcomes and address inequities in the system. We all have a responsibility to combat disparities and ensure that all people receive access and are served with respect and dignity regardless of race, circumstance, ability, or identity.

- **Housing First** – an approach to quickly and successfully connect individuals and families experiencing homelessness to permanent housing without preconditions. It is Guided by the belief that people need basic necessities a place to live before attending to anything less critical, such as getting a job, budgeting properly, or attending to substance use issues. Once the person is housed, working on goals the client has identified can begin. No pre-conditions to housing such as sobriety, treatment, or service participation requirements.
- **Prioritization** – When funds and resources are limited, program eligible persons are prioritized by vulnerability according to a uniform, standardized prioritization tool. Examples include for RRH services a Coordinated Entry assessment would be used or for “at risk” a Targeted Prevention Tool would be used. The most vulnerable are first referred to and served by housing programs that will best achieve long-term housing stability. Unsheltered homeless households and households fleeing domestic violence must be prioritized for services and programs. If projects have enough funding to assist all, then prioritization is not needed and can go off first-come, first-serve basis.
- **Progressive Engagement** – service delivery model that focuses on the immediate housing crisis and frequently reassesses the need for additional services. For example, reassessing monthly to see what the household needs, versus a blanket policy of 3 months of assistance offered regardless of need. Some clients may need more case management than others. The services are individualized and client-driven, responsive to the needs of each household, households exit to permanent housing as soon as possible, consider each unique situation and is not linear. No “one size fits all”- quite opposite and having already received assistance does not negatively impact a household’s eligibility if they face homelessness again.

- **Targeted Prevention** – A method for predicting who is most likely to become homeless such as previous experience of homelessness, individuals with serious health conditions, disabling conditions, experience of domestic violence, are in unstable housing, have pending evictions or eviction history, disruptions due to household's member demographics, or exiting an institution. It relies on nationally identified risk factors to assess vulnerability to homelessness. It is very difficult to predict who will become homeless without this assistance. It uses a scored assessment tool to rank vulnerability for homeless prevention programs.
- **Shared Housing** – Many individuals, especially the elderly experiencing homelessness are on fixed incomes. With the rising costs of rent and the low number of units that are studio or one-bedroom, shared living arrangements are a best practice to help house people and share the expenses. It may be a temporary solution where a person is able to move into and sustain housing on their own or it may become a longer-term solution for some.
- **Onboarding/Training** – This refers to the training and onboarding that occurs within an agency, is specific to the program the person operates in and more holistically to become familiar with the entire homeless response system. There are many resources available in Mason County and tools to help refer households to these various programs. The better everyone is informed and knowledgeable about available resources, the more people can be connected to the resources that will help obtain and promote housing stability.
- **Certifications and/or Degrees** – Certifications are encouraged whenever possible. This gives employees the tools and confidence to excel in their chosen role and help advance in their career. Certifications also provide the specialized knowledge to also best help households connect to services, become enrolled in supportive programs and aid in producing positive, trauma informed experiences for the household's experiencing homelessness or a housing crisis. Example certifications can include SOAR (SSI/SSDI, Outreach, Access, and Recovery), SUDP (Substance Use Disorder Professional), NCPS (National Certified Peer Specialist), or Certified Peer Counselor.
- **Outcome driven** – Agencies shall use HMIS to monitor progress toward outcome goals at least monthly. An example of outcome driven practices is reviewing each month the percentage of exits to permanent housing. Another example around program enrollment is to use the Program Roster report to ensure that an appropriate amount (90%) of the households enrolled in a rapid re-housing program have a move-in date.
- **Policies and Procedures** – The best programs have well developed policies and procedures. These policies and procedures guide the work that is done and aid in creating standardized processes across the response system. Well-developed procedures become part of the on-boarding process of new employees and create predictable outcomes when followed by everyone. It is encouraged to share policies and procedures with other agencies operating similar projects.
- **Collaboration** – It takes the expertise and specialization of many agencies working together to drastically reduce homelessness. A highly collaborative system involves agencies from various sectors such as housing services, behavioral health (mental health and substance use disorder), employment, education, language access and healthcare. A highly collaborative system has efficient and effective referral systems where households are matched to the programs they qualify for and will be able to achieve housing stability. An example of this is using Mason County's program capacity list to match households to the best programs. Agencies and employees, such as case managers, work collaboratively to support each other and the households they are

working with to achieve their housing goals. Goals should use best practices such as SMART or CLEAR goals.

- **Braid Funding / Diversification** – Additional fund sources are provided through the Balance of State Continuum of Care, Health Care Authority, and other grants. A best practice is for agencies to leverage mainstream housing and healthcare resources in program design to promote long-term sustainability and build resilient programs. Some funds are not accessible to local governments. With the homeless housing funds rooted in local document recording fees this fund source can fluctuate with the economic market. Braiding fund sources when creating programs only makes the programs able to withstand these market variations and still provide services to vulnerable households.
- **Low Barrier (CHG 2.1.2)** – Each county must have at least one low barrier project operating year-round serving homeless adults and at least one low barrier project serving homeless households with children. Low barrier projects have rules narrowly focused on a safe environment and avoid exiting program participants into homelessness. Program participants are “screened-in” rather than “screened-out” due to such challenges as having a criminal background as a barrier to housing, failure to participate in supportive services or treatment programs, failure to make progress on a housing stability plan, and/or substance use in and of itself is not considered a reason for termination. Homeless households are not screened out based on the following criteria: having too little or no income, having poor credit or financial history, having poor or lack of rental history, not following rules that don’t follow housing first principles, having involvement with the criminal justice system, having active or history of alcohol and/or substance use, having a history of victimization, type or extent of disability related services or supports, lacking of ID or proof of U.S. Residency Status, or other behaviors that are perceived as lack of “housing readiness”.
  - A low-barrier housing project has minimum requirements to enter and remain in housing. Low-barrier housing contains most of the following components:
    - ADA accessibility
    - Allows couples and families to stay together.
    - Accommodates service and companion animals.
    - Does not discriminate based on protected classes.
    - Sobriety and treatment are voluntary.
    - Does not exclude people with minor criminal convictions, poor credit, or eviction history.
    - Does not require documentation of identification, custody, or citizenship.
    - People are not turned away because of a lack of income, the appearance of motivation, or willingness to participate in services or employment.
- **Case Management** – Case management is used as a comprehensive term to include all types of positions within the homeless crisis response system that work with program participants to improve housing stability and positive housing outcomes. It may be navigators, care coordinators, case managers, or similar job titles that perform these functions. The role of these individuals is critical to the success of program participants by reducing the length of time homelessness, reducing returns to homelessness, and achieving housing stability quickly. All programs with a case management component will be required to attend training and care coordination meetings as determined by Mason County. It is also encouraged for a case manager to become certified.

- **Case Management Supervision** – Best practice is for case managers to have clear expectations on client interactions, number of appointments, procedures, referral process, program enrollment accuracy, improving appointment show rates, program participant retention. The supervisor sets the expectations and inspects what they expect. Supervisors also provide excellent coaching and feedback to help case managers grow in their positions and help clients achieve their goals. Conducting regular observations on phone calls, appointments, reviewing case notes, etc. all contribute to an effective and efficient homeless response system.
- **Intensive Case Management:** Intensive Case Management is defined as supporting an individual through case management approach, the goal of which is to help clients maintain their housing and achieve an optimum quality of life through developing plans, enhancing life skills, addressing health and mental health needs, engaging in meaningful activities, and building social and community relationships. It is moderately strong evidence base. It is designed for clients with lower acuity but who are identified as needing intensive support for a shorter and time-delineated period.
- **Lived Experience:** According to the United States Interagency Council on Homelessness, “People with lived experience must be meaningful partners in ending homelessness”. Provide people with lived experience meaningful and purposeful opportunities to inform and shape all levels of planning and implementation. Providing people with lived experience the opportunity to inform and drive change supports a trauma informed and culturally responsive approaches.
- **Repayment plan:** It is a best practice for rental assistance to set-up repayment plans so full rent is not paid at once so client stay motivated to continue working in the program. A repayment plan is a structured way to make up missed payments over a period of time. This involves working with the client and landlord to see if what the client can pay back and what they may need assistance on.

## Allowable Project Types

Allowable interventions are dependent on the fund source. Projects are funded based on the priorities set by the Housing and Behavioral Health Advisory Board, RFP application scores, compliance risk, and available funding.

## Project Type and Intervention

### Services Only Interventions

**Diversion & Coordinated Entry (CHG 2.1.3):** Coordinated Entry refers to the process used to assess and assist in meeting the housing needs of people at-risk of homelessness and people experiencing homelessness. Diversion can sometimes include a small amount of financial assistance, sometimes just case management type services. When thinking about diversion, think of this as a one-time financial assistance to help resolve a housing crisis. Key components are problem solving conversation and creativity. Some communities have been investing more energy in Diversion efforts and have their diversion staff trained in mediation (Pierce). Diverting people from needing more intensive housing interventions can be helpful in maximizing funds.

Diversion can be used for move-in costs, transportation, housing, etc. Coordinated Entry follows the assess, referral, enroll model. Coordinated Entry is used for required projects that need prioritization because not everyone could be assisted so it is based off need. Coordinated Entry has universal model policy and procedures that should be updated to meet the needs of Mason County.

When only move-in costs (security deposits, first and last month's rent) are used through Diversion, a rental agreement must be included in the client file. A rental agreement may include an Intent to Rent form, lease agreement, or Certificate of Payment Obligation (CHG 8.2). It is considered a best practice to collect lease agreements for the client files as this also ensures there are legal agreements between the landlords and tenants and demonstrates adherence to the Landlord Tenant Act.

**Street Outreach** (CHG 1.4.3.1): Tool used to engage some of the most vulnerable and marginalized community members. Outreach teams can help build trust and help people engage with the system who otherwise wouldn't. Some members of highly vulnerable populations are weary of systems (youth and veterans). Outreach helps people get connected to mainstream resources. Outreach could be going to partner agencies or mainstream services to get people connected to the system. Outreach could also be going to encampments, parking lots, or other locations where the vulnerable populations may congregate.

**PIT Count** (CHG 2.1.4.3): The Point in Time Count is an annual census of how many people and households are experiencing homelessness in one night. The pop-up event is usually held on the last Friday in January. PIT Count requires a lot of preparation with planning meetings and engaging the population prior to the event. Ensure a comprehensive and accurate count of people experiencing homelessness across all target populations. All recipients of 2163 Local Document Recording fees are required to partner with the lead agency, in a leadership capacity, to aid in the planning through implementation of events, outreach, marketing, and count surveys. The ability to connect with and survey/count people experiencing homelessness is a demonstration of the organizations' relationships with their population(s) served and is a factor used to determine future funding from the state. The PIT Count planning team can be viewed as a subset of Complete Count Committees (part of U.S. Census) – These committees play an integral part in each community in ensuring a complete and accurate count of the community, and specifically work toward increasing participation with hard-to-count groups such as immigrants, the homeless and children younger than 5.

**Flexible Funding** (CHG 6.3.3): Flexible Funding is the provision of goods, payments of expenses, or purchase of merchant gift cards or vouchers ***not included in other allowable expense categories***, which **helps a household increase housing stability or meet essential household needs**.

Essential household needs includes personal health and hygiene items, cleaning supplies, transportation passes and other personal need items. Essential household need items are available to all eligible households. Verification of housing status is not required for households with a HEN Referral. Essential needs distribution does not need to be documented in housing stability plans.

Households accessing emergency shelter with pets that require essential veterinary services to enter, such as visits for core vaccinations (i.e. rabies, distemper, parvovirus), flea treatment, and sterilization (spay or neuter), can be paid for on behalf of the household.

All eligible households are eligible for Flexible Funding. Households receiving only Flexible Funding and not ongoing assistance are exempt from income eligibility requirements. Verification of housing status is required. **Flexible Funding payments must be paid directly to a third party on behalf of the household and noted in a household's housing stability plan.**

The following is a list of allowable flexible fund activities. The contractor shall obtain pre-approval of flexible funding that is not listed below.

- **Increase Housing Stability:**
  - Gas assistance to get to work or a job interview.
  - Background Check for rental applications
  - Application Fees
  - Legal services to clear criminal charges or improve credit score.
  - Childcare: A one-time contribution to childcare to get someone caught up on late payments while on-going payments are ineligible.
  
- **Meet essential needs:**
  - Hygiene items
  - Clothing assistance for job interviews

### **Temporary Housing Interventions**

**Emergency Shelter (ES)** (CHG 1.4.1.1): Emergency Shelters provide short-term, temporary overnight shelter for people experiencing homelessness. Emergency shelters meet the immediate need for shelter, can be facility-based, or operated through hotel/motel vouchers. Emergency Shelters are measured on the ability to be at capacity, are racially equitable, and the number of households that exit shelters into positive housing outcomes.

- **Drop-in Shelter:** Drop-in shelters offer night by night living arrangements that allow households to enter and exit on an irregular or daily basis.
- **Continuous-stay Shelter:** Continuous-stay shelters offer living arrangements where households have a room or bed assigned to them throughout the duration of their stay.

Emergency Shelters should make every attempt to not have time-limited stay policies that exit individuals or households into homelessness.

Goal: 50% exits to permanent housing and less than 10% returns to homelessness within two years of exiting a positive housing destination. 95% utilization rate for single beds or, if it is a family, by unit.

**Transitional Housing** (CHG 1.4.1.2): Transitional Housing (TH) is subsidized, facility-based housing that is designed to provide long-term (up to 2 years) temporary housing that moves households experiencing homelessness into permanent housing. Lease or rental agreements are required between the transitional housing project and the household.

Master leasing is a common arrangement with transitional housing projects. The agency maintains the lease with the landlord and the agency subleases to tenants on a temporary basis

(up to two years). The agency usually handles the tenant selection and supportive services to the tenant while the landlord maintains the building.

Goal: 80% exits to permanent housing and less than 5% returns to homelessness.

Performance is measured on how many households exit from Transitional Housing into permanent housing and on returns to homelessness from two-years since the household exited. Case management and care coordination are critical elements to the success of this program.

**Permanent Housing Interventions:** Permanent housing is housing in which the household may stay if they meet the basic obligations of tenancy.

Performance is measured on how many households remain housed after the subsidy ends housing and on returns to homelessness within a two-year span. Case management and care coordination are critical elements to the success of this program. We have found that providing subsidies for a longer period of time results in better outcomes: more households remain housed when the subsidy ends and the returns to homelessness are reduced.

- **Homeless Prevention / Eviction Prevention (HP)** (CHG 1.4.2.1): Eviction Prevention helps households who are at risk of homelessness to maintain or obtain stable housing and avoid homelessness. Services include housing-focused case management and temporary rent subsidies. For case management, housing first practices will be utilized. Performance is measured on how many households remain housed after the subsidy ends housing and on returns to homelessness within a two-year span. Case management and care coordination are critical elements to the success of this program. Other critical skills of program employees include conflict resolution and mitigation strategies to maintain housing stability. Partnerships with by and for organizations and Dispute Resolutions are required. One key component of this program is to figure out if repayment plan and mitigation can be met so only those who are most at-risk can be prioritized for assistance. Please refer to county prioritization policy and procedure for Homeless Prevention process. It is also important to utilize due diligence to prevent fraud or ineligible use of funds and please refer to county ineligible use of fund policy and procedure. Refer to the CHG Guidelines section 2.2.4 for the 10% set aside for By and For Organizations. Prioritization policies should be in place. Monthly TA meetings will be provided.
- **Rapid Rehousing (RRH)** (CHG 1.4.2.2): Quickly moves households from homelessness into permanent housing by providing move in assistance, time-limited rent subsidies and housing focused case management to maintain housing when the subsidy ends. Rapid Rehousing programs usually provide rental assistance for up to 2 years and make available supportive services and housing stability case management that can continue for up to six-months after the rent subsidy ends. Performance is measured on how many households remain housed after the subsidy ends housing and on returns to homelessness within a two-year span. Case management and care coordination are critical elements to the success of this program. Other critical skills of program employees include conflict resolution and mitigation strategies with landlords.
  - Rapid Re-Housing (RRH) provides:
    - Housing Identification Services: Recruit landlords to provide housing for RRH participants and assist households with securing housing.
    - Financial Assistance: Full or partial assistance with move-in costs and deposits as well as ongoing rent and/or utility payments.

- **Case Management and Services:** Provide services and connections to community resources that help households maintain housing stability and minimize returns to homelessness.

RRH is a permanent housing project intervention type. If the tenant is on short-term leases and/or is asked to leave or is moved out and another tenant moves in after a few months this is typically not an example of a permanent housing program.

At least 90% of the program enrollments have a move-in date.

**Master Lease:** RRH projects may master lease in two ways: 1) The lease is transitioned from the agency to the tenant (so the tenant has a lease with the landlord) when the tenant achieves housing stability and is exited from the RRH program; 2) The agency continues to sublease to the tenant and the tenant makes payments to the agency. The term is an on-going, permanent situation.

Projects are defined as either utilizing tenant based RRH or project based RRH.

**Goal:** 80% exits to permanent housing and less than 5% returns to homelessness from within two years of the household exiting the program.

- **Permanent Supportive Housing (PSH)** (CHG 1.4.2.3): Permanent Supportive Housing is subsidized, non-time-limited housing with support services for homeless households that include a household member with a permanent disability. Support services must be made available, but participation is voluntary. PSH may be provided as a rent assistance (scattered site) or facility-based model. For facility-based models, a lease or rental agreement is required between the PSH project and the household. The services and the housing are available permanently.

**Goal:** 95% exits to permanent housing.

## Invoicing and Reporting Requirements

### **Naming Conventions When Submitting Invoices and Reports:**

Use the following procedure to name invoices and reports so there is a standardized process for all agencies and the departments that interact with the information. If there are any questions, please contact your grant coordinator.

Use an abbreviation for the agency that uses the first letter of each word in the agency name. Use the following format for the naming convention: Agency Abbreviation Month Year Fund Source Report Type Project

**Invoice Back up documentation:** When back up documentation is supplied separately, use the type of back up documentation provided (timesheets, receipts, ledger, etc.) at the end of the naming convention.

**Abbreviations for Invoice & Report Types =** DQ (Data Quality), ME (Monthly Enrollment), Invoice (spelled out) plus the invoice number.

**Quarterly Reports:** use the fiscal year and quarter, such as Agency Abbrev. Oct 2023 Q1 FY24

Projects = CM (Case Management), ES (Emergency Shelter), RRH (Rapid Rehousing), CE (Coordinated Entry), HEN (Housing and Essential Needs), PSH (Permanent Supportive Housing)

Examples:

CL July 2023 2163 ME CM

CL July 2023 2163 invoice #123

CH July 2023 2163.CHG DQ RRH

TPSA August 2023 2163 DQ ES

CAC July 2023 HEN invoice

## **Fiscal Reporting Requirements:**

Agencies that receive Consolidated Homeless Grant funds are also held to all requirements in the contract between Mason County and the Department of Commerce and the most current version of the Consolidated Homeless Grant Guidelines.

All COUNTY provided templates must be used and not modified without the expressed, written permission from the COUNTY. The COUNTY has the right to change the reporting requirements with notification to the CONTRACTOR.

### **Monthly Financial Invoice: *Due by the 15<sup>th</sup> of each month***

- a. All invoices and reports, including HMIS, must be accurate, complete, and received to a satisfactory level before invoices are approved and processed for reimbursement.
- b. THE CONTRACTOR will submit a monthly financial invoice to the COUNTY no later than the 15th of each month. It is important to submit an invoice free from errors for the fastest turnaround possible on reimbursements. We encourage subcontractors to include budget narratives when there has been a change or when expenses may vary more than the average.
- c. The CONTRACTOR may not manipulate, change, or adjust any template provided by the COUNTY without prior written permission from the COUNTY.
- d. Administration reimbursement requests cannot exceed the 1/12 monthly allotment. For example, if the Administration allocation is 10%, administration costs may not exceed 10% of the reimbursement requests that month.
- e. All "pooled" costs are considered "Administration" unless approved by the County.
- f. Reimbursement in one fiscal year may not exceed the approved annual budget. If annual budgeted funds are expended prior to the end of the first fiscal, no additional reimbursements will be approved for that fiscal year and programs/services are expected to continue. Any unspent funds will be rolled into the next fiscal year.
- g. CONTRACTOR must retain all back up documentation including policies and procedures on how employee time is tracked to grants, and how holiday and overtime pay is calculated.
- h. Invoices must be easy to read with program expenses clearly organized and labeled. Arrange the backup documentation in the order items appear on the invoice.
- i. If invoice has significant increase or decrease in totals, include budget narrative in the email submission to explain the change when invoice is submitted.
- j. If you make an error in any previous months or overpayments or underpayments, reach out to the COUNTY to determine the next steps.
- k. If uncertain if expense is allowable, reach out to the COUNTY.

- I. **Budget Adjustments/Revisions:** Budget adjustments/revisions are when money is moved from one budget category to another. All budget revision requests must use the **Contract Budget Transfer Request Form**. Budget revisions are allowable up to once per quarter. CHG Contracts will require Commerce approval and follow CHG Guidelines.
- m. **Cost Allocation Plan:** Agencies shall retain a cost allocation plan if the agency operates more than one program and/or multiple fund sources are used across programs. Shared costs are apportioned to the various programs using a cost allocation plan. Agencies shall submit this plan upon request.
- n. **Financial Contract Amendments:** Contract amendments will be issued when there is a change in the total contract award. Amendments are also required in CHG contracts when the total budget adjustment or sequential adjustments exceed(s) 10% of the award.
- o. **Submit monthly invoices electronically to Todd Parker, ([tparker@masoncountywa.gov](mailto:tparker@masoncountywa.gov)) and Haley Foelsch ([haley@masoncountywa.gov](mailto:haley@masoncountywa.gov)).** The Subcontractor must submit their own invoice request document and ledger. Each invoice must include:
  - The name of the agency,
  - Date submitted,
  - Dates of service (e.g. report period),
  - Contract number,
  - Invoice number
  - Name of funding source,
  - Reimbursement request per funding source,
  - Salary and benefits separated out,
  - Total hours worked by employees for the pay period. Show all time worked by fund source.
  - General Ledgers or back up documentation which includes expenses broken out by category, they cannot include client names or identifying information. It is acceptable to use HMIS numbers. When rental and/or utility assistance payments are made, the landlord's name is allowable.
  - Accounting System Report: Submit a report that recaps the source documentation from your accounting system that lists grant expenditures by program/funding source, object, date, payee name, description (if available) and amount. These reports are variously called "Expanded General Ledger," "Detail Trial Balance," and/or "Statement of Revenue and Expenditures." You may refer to it by another name. The report needs to provide enough detail so the reviewers can link each source document to the accounting system report. The reviewers need to be able to see how the amount requested on an invoice matches the backup documentation
  - All Flexible Fund (CHG 6.3.3) expenses must be pre-approved.
  - Voucher detail worksheets, if required by the grant,
  - Spenddown sheet matching the voucher detail worksheet.
  - Any HMIS reports required by the grant.
  - Total reimbursement request for each funding source, and
  - Signature from the Executive Director, CEO, and/or Board Chair.
  - Submitted by the Executive Director.

**Monitoring:**

The county reserves the right to ask for the following:

- Backup Documentation: Submit a copy of source documentation for the expenditures invoiced under the budget categories listed above. This should include copies of checks to vendors, receipts for purchases, as well as timesheets for staff and other documentation that supports the expenditures and allow us to link staff time to the charges invoiced.

## **Programmatic Reporting Requirements**

***Submit all monthly reports by the 15<sup>th</sup> of each month***

### **Scope of Service:**

The Scope of Service section in the contracts is meant to summarize the services offered by the program and is not a comprehensive view of the program and how it fits within the homeless crisis response system continuum of care. CONTRACTOR must adhere to the Scope of Services found in the Consolidated Homeless Grant Guidelines, Mason County Written Standards, Local 5-year Homeless Plan, Descriptions in the RFP, and Scope of Service section of the contracts.

If a CONTRACTOR wishes to modify or request a change in the Scope of Service, a written Scope Change must be submitted to the contract administrator in Mason County Public Health and Human Services.

**Monthly: Program Referral-Enrollment and/or Housing Placement Report:** Program Referral-Enrollment for CE & ES and Housing Placement for Rapid Rehousing programs. Contractor will use the templates provided by Mason County and will include a breakdown of all subpopulation groups the program serves: Adult, Family, Youth, Chronically Homeless and Veterans. The earlier the Monthly Enrollment Numbers are submitted the earlier the invoices can be approved for processing. The monthly enrollment report will include a breakdown of all subpopulation groups the program serves: Adult, Family, Youth, Chronically Homeless and Veterans. It will also include a referral and enrollment tracking.

**HMIS Data Quality (HUD 225) Reports** will be submitted in PDF format monthly by the 15<sup>th</sup> of each month for each program being operated.

**Quarterly Performance Report:** Due October 10, January 10, April 10, and July 10.

Performance reports will include a breakdown of all subpopulation groups the program serves: Adult, Family, Youth, Chronically Homeless and Veterans. This report will also include progress on program specific goals listed under “Program Goals” in the Scope of Service.

- A. Exits to Permanent Housing
  - a. Emergency Shelter = 50%
  - b. Rapid Rehousing = 80%
  - c. Transitional Housing = 80%
  - d. Increase percentage of exits to permanent housing from all housing intervention projects to the level of the top performing 20 percent of homeless crisis response systems nationwide.
- B. Unsheltered Prioritization: Serving at least 60% unsheltered homeless households.
- C. Returns to Homelessness
  - a. Rapid Rehousing and Transitional Housing ≤ 5%
  - b. Emergency Shelter ≤ 10%

- D. Shelter Utilization: 95% utilization rate by bed for adult shelters and room occupancy for family shelters.
- E. Data Quality
  - a. Rapid Rehousing and Transitional Housing Destination ≤ 5% unknown responses
  - b. Emergency Shelters ≤ 20% unknown responses
- F. Data Timeliness: All program staff must enter/update project participant household data into HMIS within 7 calendar days following the date of project enrollment/exit.
- G. **Landlord Outreach:** All programs that have an “exit to permanent housing” target must conduct landlord outreach. Documentation will include the date of the outreach and type. Any events will also include a sign-in sheet as supporting documentation. Outreach includes, but is not limited to, events, newsletters, in-person meetings, associations, and group meetings. CONTRACTOR is encouraged to partner with other providers to satisfy this requirement and maximize participant benefits. Include Mason County Program Coordinator on all electronic outreach efforts.
- H. **Action Plans:** The agency must submit an action plan along with the quarterly performance report when the performance is below the targeted measure. The action plan will include the goal, timelines, and measurable action steps to remedy the current performance.
- I. **Other Reporting Requirements:**
  - **Local Homeless Housing Plan** (CHG 2.1.4.1): According to RCW 43.185c, the homeless response system must submit a local homeless housing plan every five years. All agencies that receive funding are required to actively participate in the development of the plan, the implementation, annual plan updates and be accountable to the measures of success and program/system performance requirements adopted in the plan.
  - **Annual County Expenditure Report** (CHG 2.1.4.2): All agencies that enter data into HMIS must coordinate with the COUNTY a complete and accurate report of program funding information to the Department of Commerce.
  - **Point in Time Count** (CHG 2.1.4.3): All funded agencies must actively participate in the PIT Count to obtain a complete count of people experiencing homelessness in Mason County. Please refer to the section on the PIT Count that further explains participation and involvement.
  - **Essential Needs Report** (CHG 2.1.4.4): All HEN providers must submit an HEN Essential Needs Report at the end of each state fiscal year, which is a count of the total instances of Essential Needs Services.

## Summary of Contract Deliverables

Item	Date Due / Frequency	Deliverable Name	Description	Criteria for Acceptance
1	Target date July 30, but no later than thirty (30) days of the signature date by the COUNTY	Special Conditions	Contract Requirements identified in the Special Conditions Section	All requested information must be current, complete, and accurate

2	<i>Monthly, due no later than the 15<sup>th</sup> of the month</i>	Invoice	Monthly invoice & back up documentation. Voucher Detail and HMIS reports as required for invoicing.	Named correctly. Complete, accurate, and approval signature. Back up documentation is in the form of a general ledger
3	<i>On or before the 15th of each month</i>	A. CE & ES Monthly Referral/Enrollment Report B. All Program Data Quality & Timeliness (CHG 7.2.1) C. Housing Placement - RRH	A. Key community program referral and enrollment tracking B. For each HMIS Project submit a Data Timeliness and Data Quality Report - PDF format C. Demographics, fund source, zip code	A. Complete, timely, and accurate data using template(s) provided B. Data Timeliness: client data entered within 10 days of project start and exit. Data Quality: ≤ 5% unknown housing destination for RRH and TH; ≤ 20% unknown responses for emergency shelters C. Named correctly
4	<i>Quarterly, on or before the 10th of Oct., Jan., April., &amp; July</i>	A. Program Performance Report B. Coordinated Entry Tracking (5 yr. Plan Obj 1, MoS b) – Only CE Lead Agencies C. Landlord Outreach D. Training Log (CHG 2.1.5) E. Shelter Utilization Rate F. Voucher Spend Down Report	A. Outcome of key performance measures - 1) exits to permanent housing, 2) unsheltered prioritization, 3) data quality and timeliness; B. Coordinated Entry – Lead agency to provide Tracking Report (access points assist lead agency in data collection, accuracy, and tracking); C. Landlord Outreach - list of qualifying activities performed; D. Staff training for the quarter E. Shelter Utilization Rate F. Only for RRH programs (broken out by funding source) and any voucher budget items (e.g. motel vouchers)	A - F. All reports are received on time and are accurate; proper and complete use of templates; all directions followed; Action plan to accompany report for areas that are not tracking to meet program outcome benchmarks
5	<i>Annually, as described below: A. PIT Count Event Planning and Conduct Complete Count: August – February; B. February 15 - PIT Count Report C. Contract Orientation July 25, 1 pm D. Racial Equity Analysis: DUE by July 15 following the end of each fiscal year. E. Other Commerce Reports (e.g. Annual Expenditure, Housing Inventory, Local Plan)</i>	A. Point in Time Count Planning and Event B. PIT Count Report by lead agency (all other agencies assist in data verification) C. Contract Orientation D. Racial Equity Analysis E. Commerce Reports as reports and due dates are announced by Commerce	A. All activities associated with planning, hosting event, and conducting surveys for the annual Point in Time Homeless Census Count B. Formal PIT Count Report of the event, homeless census data and demographics C. Attend Contract orientation D. Racial Equity Analysis for all programs in HMIS E. Cooperation	A. Attempt a complete count of people experiencing homelessness in Mason County B. Truthful and accurate data, work with County and Dept of Commerce to verify data C. Attendance by Executive or Program Director and Program Manager D. Racial equity analysis among program inputs, outputs, and outcomes. Includes strategies and actions for improvements where disparities occur.

**CONTRACTOR must use templates when provided by Mason County**

## Policies and Procedures

The Consolidated Homeless Grant Guidelines will be the order of precedence when determining financial and program compliance. This section will expand on the sections of the guidelines on areas to provide standardization in program operation across the county. Agencies will be required to have their own policies and procedures that align with the Written Standards and Consolidated Homeless Grant Guidelines and to have procedures written in a manner each employee can follow that produces consistent, repeatable outcomes.

### Program Expectations:

Mason County Public Health and Human Services is committed to upholding program fidelity.

It is expected that agencies will have policies and procedures that align with these Written Standards, CHG Guidelines and contain the elements below.

1. **Staffing**
  - a. Hire and maintain staffing appropriate to serve the proposed number of households.
  - b. Job Descriptions: keep on file job descriptions for all personnel related to the program to include the date created, date reviewed, or date revised, duties, responsibilities, authority, and performance expectations.
2. **Program Eligibility** (CHG sections 3.2 and 3.3 and 4.2 and 4.3 and 5.2 and 5.3)
3. **Prioritization** (CHG 2.1.3 and 4.4.1) When funds are limited and not every household can be served by a program, prioritization policies and procedures must be in place. With a minimum the homeless crisis response system must prioritize households that are experiencing unsheltered homelessness and households fleeing domestic violence.
  - a. Coordinated Entry: must use the Mason County vulnerability index and program capacity list to prioritize households and provide the best match when referring potential program participants.
  - b. Must use programmatic prioritization tools such as the Eviction Prevention tool.
4. **Training Documentation** (CHG 2.1.5): Contractor is to keep a training log for all program staff and ensure required trainings are completed every three years. All new staff follow a standard on-boarding training and systems are in place to train staff on policies and procedures, housing diversion, intake forms, customer service, de-escalation techniques, trauma informed care, mental health first-aid, HMIS (Homeless Management and Information Systems data base), data timeliness, motivational interviewing, quality improvement and client file documentation. Additional training topics may be customized depending on the needs of the agency or clients.
5. **Program Recruitment and Enrollment**
  - a. Policies and procedures relating to prioritization, enrollment criteria and program denial procedures.
  - b. Reach and maintain program enrollment to achieve or exceed the goal listed in the RFP application (projected households served).
  - c. Maintain a marketing and outreach plan on file or as part of the policies and procedures.

- d. Perform and document outreach activities to community providers or providers in neighboring counties if services are not provided or there is limited capacity in Mason County.
  - e. Low barrier programs and services
  - f. Participation in and collaboration with Coordinated Entry (Examples include participation in by name meetings and being part of the local governance body)
  - g. Inter-Agency collaboration that improves program enrollments
6. **Program Participation** (CHG 2.1.2.2): Services will be provided to program participants on a voluntary basis.
  7. **Duplication of benefits**
  8. **HMIS**: Agencies are required to enter data completely, timely and accurately into HMIS.

## **Coordinated Entry (CHG 2.1.3 and Washington State Coordination Entry Guidelines):**

All agencies awarded 2163 Local Document Recording fees are required to participate in Coordinated Entry. Participation means CONTRACTOR will send and receive referrals to and from Coordinated Entry. Participation can also mean attending by name meetings and participating in governance body. Any person that is exiting a from any program into homelessness must be referred to Coordinated Entry. Agencies awarded funding to operate Coordinated Entry must comply with all HUD and the Washington State Coordinated Entry Guidelines.

Additional expectations of Coordinated Entry:

- a. Create and maintain a pocket-sized Mason County housing and food services resource card for people in a housing crisis to connect with immediate needs (food and shelter). Items to include, but not limited to phone numbers and hours of operation for Coordinated Entry, Shelters, Food Banks, and community meals.
- b. Maintain the Mason County program capacity list and resources list in Google Excel.

<https://docs.google.com/spreadsheets/d/1uZL9EKZyijX4AUNI20-wssmLkHhIKcP0bd3aoZJgGF4/edit?usp=sharing>

[https://docs.google.com/spreadsheets/d/1hGmeeA-I9S7CsV-kh\\_L0IOes4-xxQvcullzRKtug9FQ/edit?usp=sharing](https://docs.google.com/spreadsheets/d/1hGmeeA-I9S7CsV-kh_L0IOes4-xxQvcullzRKtug9FQ/edit?usp=sharing)

- c. Implement diversion processes that will reduce the amount of people who need CE required projects (Example, if someone needs one-time assistance diversion could be used instead of using RRH funding).
- d. Develop a regular visit schedule and document visits of at least once per week, but not less than once per month at places such as Veterans Memorial Hall, DSHS, HEN program, Community Lifeline, food banks, tribes, jail, schools, and hospital emergency room. In these meetings, discussion at these meetings will be to discuss if referrals/enrollments were made, action steps needed for mutual clients, who will take the lead, and by when. These meetings are intended to help support wrap around services and connecting people experiencing homelessness to the correct resources.
- e. Organize and conduct the case staffing meetings. These are the by name meetings. There are 3 meetings a month that will be led by the CE lead agency or agencies. The lead agency/agencies will use the county's spreadsheet and follow county guide to CE

for staff to have specific asks and action steps. Measured by documentation of the frequency of the meetings and provider attendance.

- f. Role of the CE supervisor is defined and provided to the county for coaching opportunities and training opportunities.
- g. The lead agency will have a coordinated process for referral and enrollments and will work with the community to ensure that good referrals are made and follow through until enrollment. The lead agency will do referrals outside of CE-required projects first and then if no other options that referrals can be made to CE-required projects based on project capacities.
- h. Develop multiple access points to ensure a “no wrong door” approach is employed, and intakes/referrals are seamless for potential households that present as homeless. A community standardized process will be used to ensure that a person presenting at any door can be routed to the appropriate resources and referrals.
- i. Develop community training that are approved by the governance body and ensure all community partners are trained on this process.
- j. Referrals and enrollments will be tracked for literally homeless households and the Mason County phased assessment process will be followed.

<https://docs.google.com/document/d/1-NaYk7NocRYsSoZrtQfrka3QdwytP2An/edit?usp=sharing&oid=113964848680216743665&rtpof=true&sd=true>

- k. Organize and manage the activities of the Coordinated Entry Advisory Board
- l. Oversee the Point in Time Homeless Census Count and the PIT Complete Count Committee to ensure a complete and accurate count of people experiencing homelessness.
- m. Build and maintain active lists that follow the dynamic prioritization process, oversee By-name meetings of people experiencing homelessness, and ensure key stakeholders are part of these meetings and confidentiality statements are on file.
- n. Track the homelessness status of all households, engagements and housing placements for each household and submit a quarterly report with this data.
- o. Secure MOUs with access points.
- p. Modify BoS model policies and procedures to be adjusted for Mason County and update annually or when there is a guideline change.
- q. Utilize a prioritization process that ensures everyone has equal access to the CE required projects and is willing to be engaged in these projects.
- r. Agency will have a achieve and exit process that complete due diligence before person is achieved or exited.
- s. It is recommended that agencies shadow other counties to learn and improve processes.
- t. Agencies will have one HMIS for diversion and one for CE-only projects.
- u. Coordinated Entry guides are available for Contractor training and processes.

<https://docs.google.com/document/d/1GxqxS206u556V0VFaoIcxTbu3dyCopksb8ijvwrhwLw/edit?usp=sharing>

[https://docs.google.com/document/d/1rg5VfmfzM3ReAQvIDmtN7XTiMvHCU75FT\\_MtW\\_CjKB20/edit?usp=sharing](https://docs.google.com/document/d/1rg5VfmfzM3ReAQvIDmtN7XTiMvHCU75FT_MtW_CjKB20/edit?usp=sharing)

- v. Program capacity: Agencies will follow CE Guidelines Section 9 on maintaining an up-to-date information on project capacities, vacancies and eligibility criteria. In order to track this, the following table can be used:

		HMIS ID				
Program	Agency					
HEN (Housing & Essential Needs)	DSHS - qualifies, enrolls Community Action Council (CAC): administers RRH & HP					
FCS (Foundational Community Supports) Supportive Housing	Amerigroup - qualifies Multiple Agencies Administer					
FCS (Foundational Community Supports) Supportive Employment	Amerigroup - qualifies Multiple Agencies Administer					
SSVF (Supportive Services for Veteran Families)	Catholic Community Services					
HUD VASH	Dept. of Housing and Urban Development (HUD) & WA State Dept. of Veterans Affairs (VA)					
Grant Per Diem Program (GDP)	WA State Dept. of Veterans Affairs					
Mental health, substance abuse	LEAD					
Mental health, substance abuse	NWR					
Mental Health	BHR					
Evaluation and Treatment Center	Telecare					
T-CAT	Telecare					
HOST	Olympic Health and Recovery Services (OHRS)					
HARPS	Olympic Health and Recovery Services (OHRS)					
HARVEST	Behavioral Health Resources (BHR)					
Shelter: Transitional Aged Youth (18 - 24)	The Youth Connection					
Family Shelter	Crossroads Housing					

Hotel Leasing / RRH	Crossroads Housing					
Rapid Rehousing CHG/2163	Crossroads Housing					
Shelter Adults without children	Community Lifeline					
Shelter Victim Service Provider	Turning Pointe Survivor Advocacy Center					
TANF	DSHS					
Home and community services	DSHS					
Section 8	Bremerton Housing Authority					
Mobile Crisis Services	Olympic Health and Recovery Services (OHRS)					
TBRA Vouchers	Bremerton housing authority					
Community Behavioral Health Rental Assistance (CBRA) program	OHRC					
Mental Health, Substance Use Disorder Services	Consejo Counseling					

Symbols can be used in each box to determine if:

- Eligible (E)
- Referred ( R)
- Enrolled (EN)

Coordinated Entry should be goal-driven to promote change to the system. One way to do this is to have challenges. Example: 100 day challenge, see how many households can be housed in 100 days or less. Best practices are incorporated in the following document:

<https://www.commerce.wa.gov/wp-content/uploads/2015/08/Commerce-100-Day-Challenge-Report.pdf>

- A decline in sense of urgency over time is a result of the lacks of system focus, outcome measurement, and discussion of current outcomes with some urgency to improve outcomes. From the 100 day challenge, best practices include:
  - Continue and expand diversion to ensure people with other options do not enter into services designed for literally homeless people.
  - Continue ensuring connection to all unsheltered families, monitoring their living situation (i.e, who self-resolves, leaves area, is still unsheltered), using housing status for prioritization, and working with them for quick housing.

- Maximize use of existing resources by regular monitoring (monthly or quarterly) and adjustments to address occupancy/ utilization, length of stay, rate of program entries from places not meant for habitation, rate of program entry from non-homeless prior living situations, and the rate of exit of permanent housing.
- Emphasize rapid return to housing, share results on the lengths of housing search with relevant staff, and celebrate significant and sustained reductions; emphasize shared and creative housing options.
- Pursue reallocation to the most impactful use of those dollars, which may mean from a more costly intervention to a most cost-effective option, from a low-performing agency to one with higher outcomes, from investing in prevention to rapid rehousing, and/or from serving families to service singles or a mixed family/single population.
- Continue and expand the partnerships and collaboration with the Community Service Offices for all system- and client-level improvements for homeless families who are part of both systems of care.
- Regularly extract and prepare data from HMIS and other data sets (e.g. DSHS), utilize it to engage in community discussion and interpretation, and inform policy and funding decisions with the data analysis.
- Pilot models with emerging cost-saving and promising practices within each county's housing crisis resolution system and seek out cross-system interventions to pilot health care and other public systems such as DSHS, education, foster care, and criminal justice.

x) Waitlist for CE required projects will be less than or equal to the capacity available. Example: Shelter has 15 units, then the Shelter waitlist will be equal to or less than 15.

Multiple CE leads expectations/roles:

- Hold half of the by names meetings per month or cofacilitate all meetings following the agenda/format set by the county and utilizing spreadsheet.
- Follow-up after by names to ensure that all action items are complete to help client move forward or connect to appropriate resources.
- Cofacilitate all advisory meetings and have joint by laws in place.
- Manage and maintain the Master Lists, have HMIS projects for diversion and CE referral following phased assessment processes.
- Develop training for all access points on intake process and enter HMIS as needed.
- Follow phased assessment flow chart and use program capacity list to ensure that everyone is connected to appropriate services.
- Update model policies and procedures from BoS and adjust for our county and bring to governance.
- Hold MOUs with other organizations.
- Develop joint marketing strategies and street outreach strategies.
- Joint PIT planning meetings based off template and coordination of pop-up event.
- Revision of assessment tools as needed.

- HMIS reports should be used to determine the effectiveness of the system and if people are being housed through Coordinated Entry.

### Point in Time Count:

Point in Time Count (CHG 2.1.4.3) Lead role in the annual Point in Time Homeless Census Count to accurately count persons experiencing homelessness in the populations served.

- a. PIT Count Report by lead agency for all events, at a minimum and due by February 15:
  - a. Events held and a summary of the events, for each event and totals:
  - b. Total number of event participants
  - c. Unsheltered Homelessness
  - d. Sheltered (includes emergency shelters, domestic violence shelter and transitional housing)
  - e. Chronically Homeless
  - f. Veterans
- b. All PIT Count forms are turned into Mason County within 30 days of the PIT Count event.
- c. Lead agency will follow template for what is expectations for Lead agency on marketing, event planning, data management, partnership, donations.
- d. The lead agency will organize planning meetings and provide leadership and invite multiple agencies. (Example: Agendas, Minutes, goals, who is doing what, etc.)
- e. Camp liaison/ street outreach year-round so we have relationships with encampments.
- f. The lead agency will ensure that people are asked what supplies they need before providing incentives for completing the survey.
- g. Surveys will be completed from Master List a week before so just confirming same situation on the day of the event.
- h. Vendor confirmation will happen before the event and set-up a day before the event.
- i. Lead agency will ensure that a pop-up event happens and takes place in Mason County on the last Friday in January.
- j. Partnerships with churches and other community organizations.
- k. Confirmation of HMIS projects will be completed.
- l. Training logs of community training of surveys, Commerce training will be submitted to Mason County.

### Permanent Housing – Rapid Rehousing:

Agencies shall have policies and procedures on program admittance, operations and exits that take the following elements described below into account.

**Start Date & Admittance:** In rapid rehousing projects, the household's project start date indicates the day the household was admitted into the program. All three criteria must be met when admitting households into Rapid Rehousing Programs:

1. **Eligible:** Information provided by referral from Coordinated Entry (or the household) indicates that the household meets the criteria for entry.
2. **Household Choice:** The household chooses to work on this project.
3. **Ready to Work:** The project is ready to assist the household with the housing search and placement process. ***The project has an opening or expects to have one in a***

**short time.** This also means the project has the funding to support all participants admitted into the program with the rental assistance needed to achieve a positive housing outcome upon exit.

- a. For the program to meet the “Ready to Work” criteria, a target is **90% of the program participants admitted into the program have a move-in date.** Use the HMIS Program Based Reports, Program Roster (GNRL-106) report to look for the Move-in field to be completed and length of stay in the program.

**Master Lease:** RRH projects may master lease in two ways:

1. The lease is transitioned from the agency to the tenant (so the tenant has a lease with the landlord) when the tenant achieves housing stability and is exited from the RRH program.
2. The agency continues to sublease the tenant and the tenant makes payments to the agency. The lease should be for a longer term such as one year and with the intent for an on-going, permanent housing situation.
3. The subcontractor’s P&P must specify if the project is “Tenant-Based” or “Project-Based” and have criteria for specified.
4. Permanent Housing Intervention Types may not pay for temporary housing solutions.

**Private Landlords:** 40% of the funds rental assistance funds allocated must be to private landlords.

- **Landlord Outreach:** All agencies with required targets for “exits to permanent housing” must conduct landlord outreach, at least quarterly. The purpose of this outreach is to recruit new landlords, provide education, promote programs, conduct landlord events, etc. Landlord outreach in this context does not represent calls on behalf of an individual program participant to obtain housing.

## **Rent Limit Policy and Procedure: Rapid Rehousing**

### **Scope**

Section 8.4 of the CHG Guidelines states that Lead/subgrantees must choose either the HUD Fair Market Rent or the Rent Reasonableness payment standard to be used for all units receiving a rent subsidy, including arrears, and must be completed before the rent subsidy is paid.

### **Policy**

Contractor will adopt Mason County’s Rent Limit Policy and Procedure. It is the policy of Mason County to set 150% FMR as the rent limit. The exception policy is to make an exception when the rent, especially within a given geographic area of the county is over 150% FMR.

The rental assistance paid cannot exceed the actual rental cost.

### ***Priority Method: Rent limit is up to 150% Fair Market Rent:***

If the unit is under 150% FMR, the subcontractor may document that the unit was under 150% FMR in the client file and pay the rent subsidy. If rent assistance is paid out of county, the FMR of where the unit resides will be used.

**Exception - Rent Reasonableness:**

Exceptions are rare and are a case-by-case scenario and subcontractors should obtain approval from the county.

**FMRs by unit bedrooms**

<b>Year</b>	<b>Studio</b>	<b>1 bed</b>	<b>2 bed</b>	<b>3 bed</b>
– October 1, 2023- September 30, 2024	\$ 866	1040	\$ 1278	\$1801

**150% FMR**

<b>Year</b>	<b>Studio</b>	<b>1 bed</b>	<b>2 bed</b>	<b>3 bed</b>
– October 1,2023- September 30, 2024	1299	\$ 1560	\$ 1917	\$ 2701.50

**Emergency Shelters:**

- Emergency shelters shall not have excessive rules that become barriers for unsheltered persons or households to stay in the shelter.
- Emergency shelters shall not have excessive rules that exit a person or household to homelessness.
- While we recognize that some behaviors are dangerous to shelter stayers and employees, the emergency shelter shall have policies and procedures that clearly outline any terms of debarment, opportunities to rectify the situation and provisions for additional chances to stay in the shelter. Many individuals experiencing homelessness have mental health conditions and/or substance use disorders that may prevent them from certain behavioral standards. The emergency shelter shall make all attempts to obtain the appropriate and adequate treatment for the individual(s) that may not be able to follow all the shelter rules.
- Shelter rules are trauma informed.
- Exit to permanent housing rate of 50%
- Follow Centers for Disease Control and Washington Department of Health’s guidelines for congregate living.
- Develop and implement a hazardous weather response plan with the ability respond to community needs during periods of extremely hot or cold weather or severe poor air quality due to wildfire smoke.
- Operate a notification system for key community partners on bed availability, referral process and provides adequate resources and assistance to individuals that are unable to stay when the shelter is at maximum occupancy capacity.
- Follow low-barrier best practices. Low barrier projects have realistic and clear expectations. Rules and policies are narrowly focused on maintaining a safe environment and avoiding exits to homelessness. Low barrier projects do not have work or volunteer requirements. Households are not terminated from the project for the following reasons: Failure to participate in supportive services or treatment programs,

failure to make progress on a housing stability plan and/or alcohol and/or substance use in and of itself is not considered a reason for termination.

## **Eviction Prevention:**

### **Eviction and Homeless Prevention Prioritization Policy and Procedure (CHG Section 4)**

**Policy:** Mason County will use a standardized process for prioritizing people for assistance for all homeless prevention programs under Consolidated Homeless Grant and 2163, excluding Housing and Essential Needs (HEN). All homeless prevention programs will follow Mason County's Prioritization Policy and Procedure and will use the targeted prevention scoring tool without a required score. Sample client files will be provided to the Contractor for training.

### **Prioritization Policy and Procedure**

**Policy:** Mason County will use a standardized process for prioritizing people for assistance for all homeless prevention programs under Consolidated Homeless Grant and 2163, excluding Housing and Essential Needs (HEN). As funding is limited all clients from waiting list will be prioritized by first time use, 50% AMI, and Amounts of months behind. All clients can be served if qualified based on guidelines and waitlist is served.

### **Procedure:**

- 1) Case managers/processors will use the targeted prevention eligibility screening form to check for a) Minimum Eligibility Criteria b) Score an individual for a prioritization score. Once all paperwork is completed and in case file, then the individual may be added to the prioritization list.
- 2) Case managers will also ask clients and document the following: How many individuals are in the household, total income that household makes, date received all paperwork, number of minors under 18 years old.
- 3) Case manager will take information obtained to standardize income by dividing by number of HH members. Example: Total income=\$20,000 and there are 4 HH members. The standardized total would be \$5,000.
- 4) Case manager will put HMIS ID number, HH size, income, standardized income, date received paperwork, number of minors under 18 years old, and case manager name in excel spreadsheet.
- 5) Before payment is made, excel sheet will be sorted by standardized income first and the top applications would receive payment. If ties, then next category would be prioritization scores, if still ties then next would be highest number of minors under 18, and finally if still tied then first come first serve.
- 6) Executive Directors will determine that only the individuals with the highest prioritization will be served with rental assistance.
- 7) Rental arrears are allowed back to June 30,2022 forward except if individuals were on the previous temporary emergency eviction programs list and did not receive assistance.
- 8) Prioritization will start with first time application and then if available funding is left over than recertifications can be readded to the prioritization list.

## **Coordinated Entry and Homeless Prevention HMIS Policy**

**Policy:** Mason County will utilize a standardized process for entering Coordinated Entry and Homeless Prevention in HMIS.

**Procedure:**

- 1) Client come to access the CE system can be screened for if appropriate to go to CE Referral project in HMIS.
- 2) If at risk of homelessness, the full CE assessment is not needed to be completed and only a Target Prevention Screening Tool is necessary. A separate Master List can be kept so Homeless Prevention do not need to be entered into Coordinated Entry in HMIS. If become homeless, they would be then entered in Coordinated Entry.
- 3) If experiencing homelessness: Follow flow chart and go through diversion process. If being diverted, exit from CE, and put exit destination so we can get diversion numbers.
- 4) Try mainstream resources and if do not work then with VI score determine if appropriate and high enough for RRH services. If not, keep in CE referral pool and help to find mainstream resources.

**Coordinated Entry and Homeless Prevention Prioritization**

Policy: Mason County employ a dynamic prioritization system (WA State CE Guidelines 9.2) that considers a household’s prioritization status and current resource availability. This approach requires CE to anticipate upcoming resource availability (e.g. next 60 days.) and the tables below is utilize for guidance. Mason County tool is to help guide what type of assistance may be appropriate based on vulnerabilities from the Coordinated Entry Vulnerability Index or the Targeted Prevention Screening Tool for Homeless Prevention.

**Prioritization- Eviction Prevention**

<b>Targeted Prevention Screening Score</b>	<b>Points</b>	<b>Intervention Type</b>
High	29- 43 Points	Step 1: Attempt landlord negotiation payment plan. Step 2: Set goal with client on how much they can pay with their budget and provide financial assistance/ subsidies and case management.
Medium	15-28 Points	Step 1: Attempt repayment plan with partial or no financial assistance/ subsidies to tenant. Step 2: Assistance with connection to Dispute Resolutions Center and Northwest Justice, mediation with landlord.
Low	0-14 Points	Assistance with connection to Dispute Resolutions Center and Northwest Justice, mediation with landlord.

**Prioritization- Coordinated Entry**

<b>Vulnerability Score</b>	<b>Families</b>	<b>Single Individuals</b>	<b>Housing Type/ Intervention</b>
High	31-37 Points	32-37 Points	PSH if available or work to convert current project type into PSH.  Other Permanent Housing with access to case management, BH options, or rehab
High-Medium	24-30 Points	28-31 Points	RRH (TPSA or CH)  Transitional Housing  Family Shelter
Medium	11-23 Points	15-27 Points	Other mainstream resources
Low	0-10 Points	0-14 Points	Diversion  Resource Information

**Ineligible Use of Funds & Fraud Prevention Policy (CHG 7.5.1):**

**POLICY PURPOSE**

This policy is intended to create a standardized response to fraud or suspected fraud, and to provide good stewardship of public funds and to follow the ineligible use of funds requirement listed in Consolidated Homeless Grant guidelines. Fraud prevention and awareness are the first steps in ensuring the resources are getting to those most in need. This policy attempts to seriously examine the possibility of fraud while minimizing the impact of implicit bias in decision making and, by extension, the impact of those biases on overall access by marginalized populations. Additionally, it intends to protect employees from ambiguous instruction on fraud prevention and investigation. Mason County Public Health has their subcontractors work to ensure that fraud policies are in place at an organization level for each agency and each agency looks for “flags” of fraud.

**SCOPE**

Fraud is a criminal act in which individuals, groups, or businesses steal taxpayers’ monies from local State and Federal programs. Tenants and landlords who make false statements regarding their income or family size, or alter official documents, are committing fraud. Employees who engage in bribery, embezzlement, or who alter, forge, or destroy records are committing fraud.

**POLICY**

Mason County Public Health and subcontractors will follow procedures to help reduce and prevent fraud from happening in every attempt to safeguard public funds. When encountering potential fraud, the reduction of bias will be minimized so overall access to the grant is not affected. The contractor will adopt Mason County’s Ineligible Use of Funds and Fraud Prevention Policy.

**PROCEDURES**

- Subcontractors will confirm all information documented in client file is accurate to make the best attempt to prevent ineligible use of funds.
- Subcontract will use due diligence when approaching ineligible use of funds.
- Employees will look out for signs of fraud on applications and forms, or “flags.” Employees will **not** rely on “hunches,” “suspicions,” “intuition,” or other subjective and potentially biased evidence to flag fraud.
- Employees will send client files or documentation that is believed to have signs of fraud to another employee or manager for review and to allow oversight.
- If fraud is suspected, the employee will immediately notify their supervisor and more information from the client may be collected and keep a log. On the log be specific about the situation of ineligibility.
- If suspicion of fraud is not alleviated, subcontractors will notify the appropriate law enforcement.
- If any new grant funds were spent on any ineligible households or expenses, subcontractors will:
  - a. Fill out completely and submit Tab A: Questionnaire for new fraud of the fraud log to Mason County Public Health & Human Services within one week of identifying that there has been an ineligible use of funds and include information and documentation listed below on forms needed for the Department of Commerce.
  - b. Mason County Public Health & Human Services will inform the Department of Commerce of the ineligible use of funds and report to the State Auditor’s Office.
  - c. After the initial questionnaire is submitted the case would then be moved to Tab B and the subcontractor would provide updates every 6 months.
  - d. If cases are closed, then the information can be moved to Tab C of the fraud log.
- The following documentation and information shall be collected from the Subcontractor and sent to the grant manager at the Department of Commerce:
  - a. Landlord Payment Obligation Form
  - b. Copy of police report, and any other types of notes, communication, etc. that might fall into the category “incident report” by Subcontractor.
  - c. Total money lost. If unsure on how much was paid or how much was actually fraudulent, then just total amount paid to the third party.
  - d. Description of process put in place to ensure third party will be “flagged” if there is an application for future assistance. (Doesn’t mean that they aren’t eligible for assistance, just that there is awareness around this incident if they were to present for services).
- Subcontractors will update Mason County every six months in March and September 1<sup>st</sup> on reported cases by following up with law enforcement or the prosecutor’s office. Mason County may be asked for information sooner based on if Commerce needs additional information. New cases will need to be provided immediately.
  - a. Subcontractors will provide specific information in the six-month update in October fraud log and after October 2022, will use the questionnaire to update:
    - Date of last contact with the police and/or prosecutor’s office.
    - Next steps that the police or prosecutors are going to take.
    - Date of court date if this has been set.
    - If there was a court hearing, results of the court hearing.
    - What happened with the funds?

## Benefit Verification System Requirements (BVS) (CHG 2.1.6)

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

The COUNTY and designated contact at each agency accessing BVS are considered “leads”. Each lead agency contact will manage BVS User access for their staff and the COUNTY will manage BVS access for the homeless response system and oversee subgrantee protocol.

BVS leads are responsible for the following:

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

BVS leads are also responsible for the following, annually:

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

## Homeless Management Information Systems (HMIS) (CHG 7.2)

### Policies:

- Date entry into HMIS is required. Adhere to the HUD Data Standards for HMIS.
- CONTRACTORS are also required to review Housing Inventory Counts annually. Notify the COUNTY when any changes are made to the inventory.
- **CONTRACTOR shall provide the county with a list of all HMIS users.**
- Notify the COUNTY and submit a Commerce HMIS Help Desk Ticket Form at [Washington State Department of Commerce Homeless Management Information System \(HMIS\)](#) when a person leaves the organization so access can be deactivated.
- CONTRACTORS are required to have each program set up correctly in HMIS.
- CONTRACTOR must notify the COUNTY when any changes are made to the program and work with the COUNTY to ensure that HMIS accurately reflects the operations and services of the program.

- CONTRACTOR agrees to meet all data entry quality standards of completeness (7.2.1.1), timeliness (7.2.1.2) accuracy (7.2.1.3), and consistency (7.2.1.4) for HMIS, to run monthly data quality reports and notify the COUNTY if any updates need to be made to your Agencies Projects or if you need any Projects added.
- CONTRACTOR agrees to conduct internal data quality, completeness, accuracy, and timeliness checks monthly.
- Contractor agrees to implement processes and internal checks to ensure data timeliness benchmarks are met, namely the entry of client data within 7 days of meeting for both entry and exit. CONTRACTOR agrees to respond to any data timeliness reports within five (5) business with a plan to correct any records entered 14 or more days from meeting with the client.
- Contractor is expected to run the Data Quality Report (HUD 225) in HMIS to monitor data quality, completeness, and timeliness monthly and email this to the Mason County Program Coordinator no later than the 10<sup>th</sup> of each month to verify this has been completed and write a plan to correct data entry errors.
- CONTRACTOR agrees to participate in all Department of Commerce quarterly data quality checks and data integrity for special reports such as Annual Point in Time Count, Housing Inventory Count and Annual Performance Report. CONTRACTOR is expected to communicate with the COUNTY within 5 business days from the date of contact to resolve any reporting issues and concerns.

### **Confidentiality and Safeguarding Information:**

“Confidential Information” as used in this section includes:

- i. All material provided to the Contractor by COMMERCE that is designated as “confidential” by COMMERCE.
- ii. All material produced by the Contractor that is designated as “confidential” by COMMERCE.
- iii. All personal information in the possession of the Contractor that may not be disclosed under state or federal law.

The Contractor shall comply with all state and federal laws related to the use, sharing, transfer, sale, or disclosure of Confidential Information. The Contractor shall use Confidential Information solely for the purposes of the homeless response system and shall not use, share, transfer, sell or disclose any Confidential Information to any third party except with the prior written consent of COMMERCE and the COUNTY or as may be required by law. The Contractor shall take all necessary steps to assure that Confidential Information is safeguarded to prevent unauthorized use, sharing, transfer, sale or disclosure of Confidential Information or violation of any state or federal laws related thereto. Upon request, the Contractor shall provide the COUNTY and/or COMMERCE with its policies and procedures on confidentiality.

COMMERCE and/or the COUNTY may require changes to such policies and procedures as they apply to contracts whenever COMMERCE reasonably determines that changes are necessary to prevent unauthorized disclosures. The Contractor shall make the changes within the time-period specified by COMMERCE. Upon request, the Contractor shall immediately return to COMMERCE and/or the COUNTY any Confidential Information that COMMERCE and/or the COUNTY reasonably determines has not been adequately protected by the Contractor against unauthorized disclosure. C. Unauthorized Use or Disclosure.

The Contractor shall notify COMMERCE and the COUNTY within five (5) working days of any unauthorized use or disclosure of any confidential information and shall take necessary steps to mitigate the harmful effects of such use or disclosure.

## **Procedures: HMIS Reports, tools, and what to look for in the reports**

- **Program Roster [GNRL-106]** (under Program Based Reports).
  - Double check that the number of people served is accurate.
    - Enter anyone who is currently being served in your project but is not in HMIS yet.
  - Exit anyone who is no longer being served by your project. Make sure the entry and exit dates are correct.
  - Length of Stay (LOS): LOS is useful to examine if a person should be exited from the program, determined if other actions with case managers should be taken to exit the person into positive housing outcomes and effectiveness of the program in resolving housing crisis.
  - Move-in Date: Do all participants in a RRH project (or at least 90%) have move-in dates?
  - Are names spelled correctly?
  - Are consent refused all entered the same way?
- **HMIS Data Quality Report [HUDX-225]** (under HUD Reports)
  - Use this report to assess the total number served and heads of households is correct.
  - Update records with errors (if the report is run in HTML mode, the record can be selected, and it will open a new page with the records that are in error.
  - Pay special attention to any element that shows over a 5% error rate (ignore name. If there is a high error rate, it is usually a “completeness” issue.
  - Destination: error rates in this category are the result of “unknown” exits.
  - Data Timeliness: the table quickly identify timeliness of project entries and exits to help manage timely record keeping.
  - Annual Assessments: all program participants that have been in the program for over a year, must have annual assessments.
  - Here is a link to the reference tool that will explain the different sections of the report: <https://get.clarityhs.help/hc/en-us/articles/115012435727--HUDX-225-HMIS-Data-Quality-Report>
- **Program Details Report [GNRL-220]** (under Program Based Reports) in HMIS, keep these fields in mind:
  - Housing move-in date (element 3.20) for Rapid Re-housing and other Permanent Housing projects. Don't forget this important update! If this is blank it looks like the participant was never housed by your project.
  - Update Income and non-cash benefits before exiting (where required) – this is especially important for Continuum of Care-funded projects which are scored on this measure.
  - Enter a real exit destination – don't choose don't know, refused, data not collected, no exit interview completed, or “other” whenever it's avoidable.
  - Living Situation (element 3.917) for all projects – don't choose don't know, refused or data not collected whenever it's avoidable.

- Household “groups” – is everyone enrolled in the project in the same group? This helps determine Household type, it’s important to make sure it’s right.
- **Program Outcome Measures [OUTS 101] under Program Based Reports**
  - Run the report by head of household rather than by person. Select “HoH”.
  - Exits to permanent housing = total discharged to permanent housing
  - Use the report for accuracy to make sure all discharge destinations are accurate for the month.
- **Annual Performance Report [HUDX-227]:**
  - Q6c: Destination status – high error rate is due to unknown exit destinations.
  - Q63: Data Timeliness
  - Q7: Number of persons served
  - Q8a: Households served
  - Q15: Living Situation (can determine percent of people experiencing unsheltered homelessness served)
  - Q23c: Exit Destination
- **Data Quality Dashboard (Dept. of Commerce Website):** Contractor will use the data quality dashboard to help improve timeliness, accuracy, and completeness.  
[https://public.tableau.com/app/profile/comhau/viz/DQDashboard\\_15719398928900/BoS](https://public.tableau.com/app/profile/comhau/viz/DQDashboard_15719398928900/BoS)
- **Other ways to use HMIS reports**
  - Run HUD Annual Performance Report and select web page
    - Click on Veterans number and this will provide list of veterans.
    - Click on youth under 25 and this will provide list of youth
    - Click on fleeing domestic violence and see if you can connect to DV provider.
    - Click on TANF to see if receive TANF services through DSHS
    - Click on no insurance for a list of people who need insurance coverage
    - Click on chronically homeless to determine who is chronically homeless.
    - Click on no income to determine if need to help get a source of income.

## Contract Monitoring

It is expected that subcontractors and the local government work to ensure contract compliance and program fidelity. The County is committed to quality improvement and to provide technical assistance to aid in any quality control and improvement processes.

**The subcontractor shall conduct a comprehensive internal program monitoring within 6 months of the contract start date and annually thereafter.** Comprehensive refers to policies and procedures and each section of the guidelines, which includes client files, allowable expenses and HMIS standards. If there are areas that need correction, it is expected the subcontractor will conduct a follow up monitoring within 1 – 3 months to ensure compliance. The County may have the subcontractor sign an attestation that monitoring has been conducted. The subcontractor will keep a log documenting the internal review with the minimum information:

- When the monitoring was done.
- Who conducted the monitoring.

- What was monitored.
- A record showing the results of each section monitored.
- Corrective Actions for areas that need improvement.

The County shall monitor all Consolidated Homeless Grant (CHG 2.2.3.1) contracts according to the Consolidated Homeless Grant Guidelines and Written Standards (this document). Monitoring frequency will be determined from the risk assessment.

1. All contracts funded with Local Document Recording fees may be monitored to compliance with some or all the following:
2. General operations, adherence to contract, and program policies and procedures
3. Financial invoices, statements, allowable expenses, duplicate payment, etc.
4. Client Files (Reference Appendix C of CHG Guidelines: At a minimum includes the following items:
5. CHG Appendices: Contractor will use appendices to ensure that required forms are in client files, Policies and Procedures are on file, performance measures are met, eligibility requirements are met, and HMIS practices are used.

	Client File Checklist	HMIS ROI	Assessment & Housing Stability Plan	HH Program Eligibility Determination	Lease or Agreement	Rent / subsidy determination
Shelter	X	X	X			
Services Only	X	X	X	X		
Case Management	X	X	X	X		
Transitional Housing	X	X	X	X	X	X
RRH	X	X	X	X	X	X

**Additional required Policies and Procedures:**

- Participation in CE/ CE P&P if receive funding
- Grievance
- Program Termination and Denial
- Low Barrier
- Habitability complaint
- Does not require participation in religious services
- Households who receive rent assistance will receive WA State Landlord Tenant Act
- Rent Limit
- Hotel/motel if applicable

**Required Performance Measures**

The table below illustrates the minimum required performance measures by project intervention type. The Homeless Response System is evaluated at the program level and the system level. To ensure that system level performance requirements are met, the county reserves the right to modify the project level performance measures.

The following situations describe where performance measures have been modified to ensure system level performance measures are met:

**Emergency Shelters:**

- Emergency shelters that are continuous stay, have independent family units (e.g. similar to a studio apartment) or emergency shelters that use single family homes as scattered site emergency shelters are expected to have a higher exit to permanent housing rate. The goal is 70% exits to permanent housing.
- 95% utilization rate for single beds or, when it is a family, by unit.

**Action Plans:** When performance measures are more than 5% from the goal, the agency must submit a detailed action plan that includes a stated goal and lists the measurable, timebound activities that will accomplish the goal. Action plans are due along with Quarterly Performance Reports.

**Diversion/Coordinated Entry:**

- 50% of all households that present at the homeless crisis response system are diverted to permanent housing.

**Table 1:** Required Housing Outcome Performance Measures

Intervention Type		Performance Measure	HMIS Calculation	Acceptable Progress	Performance Target
Emergency Shelter (ES) <sup>15</sup>	Required	Increase Percent Exits to Permanent Housing	Of people in ES who exited, those who exited to permanent housing <sup>16</sup> destinations.	Increase by at least 5 percentage points	At Least 50%
	Optional	Reduce Median Length of Stay	Of the people active in ES, the days homeless as measured by each client's start and exit dates strictly as <u>entered into</u> HMIS.	Decrease by at least 5 days	20 Days or Less
Drop-in Emergency Shelter <sup>17</sup>	Required	<b>NEW!</b> Increase Percent Exits to Positive Outcomes	Of people in Drop-in ES who exited, those who exited to Positive Outcome <sup>18</sup> destinations.	Increase by at least 5 percentage points	At least 50%
Transitional Housing (TH)	Required	Increase Percent Exits to Permanent Housing	Of people in TH who exited, those who exited to permanent housing destinations.	Increase by at least 5 percentage points	At Least 80%
	Optional	Reduce Median Length of Stay	Of the people active in TH, the days homeless as measured by each client's start and exit dates strictly as <u>entered into</u> HMIS.	Decrease by at least 5 days	90 Days or Less
Rapid Re-Housing (RRH)	Required	Increase Percent Exits to Permanent Housing	Of people in RRH who exited, those who exited to permanent housing destinations.	Increase by at least 5 percentage points	At Least 80%
Permanent Supportive Housing (PSH)	Required	Increase Percent Exits to or Retention of Permanent Housing	Of people in PSH with a Housing Move-in Date, those who remained in PSH or exited to permanent housing destinations.	Increase by at least 5 percentage points	At Least 95%

**Compliance, Corrections, and Performance Improvement**

1. **Compliance.** COUNTY will monitor CONTRACTOR compliance with the general terms, conditions, and requirements of this contract through audits (remote or on-site), and all reporting and financial activity through review of the following, though not limited to; CONTRACTOR monthly financial and enrollment reports, general ledger transaction detail, quarterly narrative reports, and meetings with CONTRACTOR. Contracts that are in non-compliance are at-risk of not qualifying for additional funding through the Request for Proposal Process. The CONTRACTOR agrees to ensure all Contractor Requirements, as outlined in the Scope of Service. Failure to comply with or submit timely and complete materials related to Contract Requirements may result in withheld

or delayed payments. Reports, invoices, and documents must be submitted as detailed in the Scope of Service.

2. **Corrective Action:** assessed monthly with the submission of financial invoices and performance reporting. Corrective Actions are reserved for contract issues that are behavioral in nature. The steps are progressive, and the CONTRACTOR will remain in the non-compliance status corresponding to the infractions and delinquencies outlined below.
  - a. In Compliance
  - b. Corrective Action Status
  - c. Probation Status
  - d. Reduction in Funding
  - e. Early Termination

### **Corrective Action Notice Levels:**

**Level 1:** Issued for non-conformity that can be corrected on the spot and where no further corrective action response is necessary.

**Level 2:** Issued when a contractual nonconformity cannot be corrected on the spot.

**Repeat Level 1 or 2:** Non-conformities found within one-year for the same single point failure characteristics (or closely related points) shall be issued as a Level 3 Corrective Action Notice at the discretion of the Administrative Officer of the Contract.

**Level 3:** Issued to the Executive Director and Board of Directors to call attention to serious contractual non-conformity. A Level 3 Corrective Action triggers a Quality Improvement Plan.

**Level 4:** A Corrective Action issued to the Executive Director and Board of Directors from the Board of County Commissioners or County Administrator when a Level 3 Corrective Action has been ineffective, or the contractual non-conformity is of such a serious nature to warrant contractual remedies such as possible early termination of the contract.

3. **Non-Compliance Corrective Action Steps:**
  - a. **Level 1 or 2:** Late submissions, not following directions, missing documents, incomplete documents, low required meeting attendance, and/or discrepancies. CONTRACTOR will have five (5) business days to fix and return to a satisfactory level. COUNTY may withhold payment until the issues are resolved to a satisfactory level. Technical assistance will be provided by the COUNTY.
  - b. **Level 3 and continued Level 1 and 2 infractions:** (consecutive or non-consecutive): The CONTRACTOR will have 5 business days to respond and submit a **Quality Improvement Plan (QIP)** that will remedy the issues. If the QIP is unsuccessful in remedying the contractual issues, the agency moves to Level 4. All Level 3 Corrective Actions shall be coordinated with the Administrative Officer of the Contract.
    - i. The CONTRACTOR is now in a **Corrective Action Status**. The COUNTY will provide the CONTRACTOR with written notice once it has

determined satisfactory improvement has been met. Technical assistance will be provided by the COUNTY. A letter from the Administrative Contact will be sent to the Executive Director and Board of Directors. The Housing and Behavioral Health Advisory Board and the Board of County Commissioners will be notified of the Corrective Action Status; ongoing status updates will be provided at the request of the Board(s).

- ii. In the event the quality improvement plan is on invoices, subcontractors may be delayed in payment until the invoice can be approved to a satisfactory level.
- c. **Level 4:** Failure to make satisfactory improvement within the timeline outlined in QIP: The CONTRACTOR will be placed in **Probation Status**. Technical assistance will continue to be provided by the COUNTY. If the Quality Improvement Plan is unsuccessful in remedying the contractual issues, further action may be taken such as withholding payment, reductions of monthly invoice requests, cost disallowances, or reductions of administration allocations. CONTRACTOR remains in Probation Status. A letter will be sent from the Director of Public Health & Human Services to the Executive Director and Board of Directors.
  - i. If the CONTRACTOR is unable to effectively implement the actions and technical assistance provided to a satisfactory level, there may be a reduction in funds. Funding will first be reduced from the remaining “Administration” funds. CONTRACTOR will have five (5) business days to fix and return to a satisfactory level. If not fixed to a satisfactory level within five (5) business days, the withhold of payment action will go into immediate effect. Payments will be withheld until all invoices and/or reporting is completed to a satisfactory level. CONTRACTOR will be placed in a **Reduced Funding Status**. CONTRACTOR may apply for funding on the next Request for Proposal cycle, but future funding awards will be impacted.
  - d. **Probationary Status and Unresolved Corrective Actions:** Grounds for early contract termination or non-renewal of additional contract terms. If the contract is terminated early, the CONTRACTOR will be notified and expected to follow all contract obligations under the contract close-out clause. All contract terminations will be approved by the Board of County Commissioners. CONTRACTOR may apply for funding on the next Request for Proposal cycle but will start the contract term on Probation Status.
- 4. **Performance Improvement Plan Status:** Assessed monthly and quarterly with the submission of performance reports. Performance Improvement Plans are reserved for contract issues that impact deliverables around numbers served.
  - a. **In Compliance:** CONTRACTOR meeting Contract Requirements and deliverables as outlined in Scope of Service.
  - b. **Step 1: Monitoring Status** – Monthly performance is below 85% of projection. CONTRACTOR must submit an Action Plan to improve performance that is subject to monthly reviews with COUNTY staff. The Action Plan shall: cite and describe the CONTRACTOR’S specific area(s) in need of improvement, including, though not limited to compliance with contract requirements, model fidelity, performance progress, financial activity, and/or enrollment performance. For the specified area(s) in need of improvement, the Plan shall provide metrics

or benchmarks to serve as indicators of satisfactory improvement; identify corrective action items and/or steps the CONTRACTOR shall comply with to address cited areas in need of improvement; identify technical assistance and/or other supports to be made available by COUNTY to the CONTRACTOR to assist the CONTRACTOR in achieving satisfactory improvement; and outline a timeline for the completion of the Action Plan by the CONTRACTOR.

- c. **Step 2: Performance Improvement Plan Status** – Assessed at quarterly benchmarks. CONTRACTOR must submit a Performance Improvement Plan. CONTRACTOR will participate in a monthly Performance Improvement Plan meeting with COUNTY staff. The purpose of the meeting is to discuss the plan; gather information and feedback from the CONTRACTOR; share and review COUNTY data; other available program data; and other information related to areas in need of improvement which may be used to inform, evaluate, and update the Performance Improvement Plan.
  - d. **Step 3: Up to 20% reduction in funding** over the balance of the contract if CONTRACTOR'S performance remains below projections for two or more quarters.
  - e. **Early Contract Termination.** COUNTY may terminate this contract prior to the end of the Term if satisfactory progress toward the goals of the Performance Improvement Plan is not met by the CONTRACTOR, and/or if the CONTRACTOR is not able to or is not cooperative in development and Performance of the Performance Improvement Plan.
  - f. **Transition off Performance Improvement Plan Status:** If satisfactory improvement in the specific area(s) indicated in Plan is met by the CONTRACTOR, within the timeline for completion of the Plan, the CONTRACTOR shall be transitioned out of Performance Improvement Status. COUNTY will provide the CONTRACTOR written notice of this transition once it has determined satisfactory improvement has been met following the timeline for completion of the Plan.
5. **Contract Close-Out:** In the event a CONTRACTOR is delinquent on final contract close-out invoicing and/or reporting, and they have been re-funded whether it is the same or a different program, the current contract will start in probation status under the Non-Compliance Corrective Action Steps. Under this condition, any missed deliverable or act of non-performance can lead to early termination.

CONTRACTOR has until July 31 to close out previous contract by submitting all invoices and reports to a satisfactory level. COUNTY is not obligated for payment beyond this period. If funding has been awarded for the next grant term and there are outstanding invoices or reports that are not cleared to a complete and satisfactory level by July 31, the CONTRACTOR will start the new contract term in Probation Status.