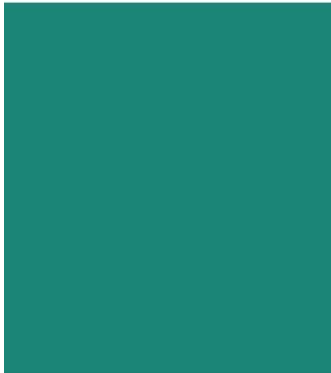




KCRHA
King County Regional Homelessness Authority

THE OMBUDS OFFICE PRIMER

AN OVERVIEW OF KCRHA'S OMBUDS OFFICE &
HOW IT OPERATES TO SERVE KING COUNTY'S
HOMELESS RESPONSE SYSTEM



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I. Introduction

This document defines and clarifies the standards of the Ombuds Office within the context of the King County Regional Homelessness Authority (KCRHA). The intent of this document is to:

- a. Educate the community about the history and role of the Ombuds Office.
- b. Articulate the practices, principles, and standards of the Ombuds Office.
- c. Ensure the Ombuds Office operates in a manner consistent with this document.

II. Background: The KCRHA and the King County Homeless Response System

According to Community Solutions, the homeless response system "refers to the various organizations and entities within an area that serve homeless individuals and families. These [organizations and agencies] can include nonprofit organizations, housing authorities, local and federal government agencies, faith-based organizations, the VA, shelter providers, and other homeless coalitions."¹

In King County, the King County Regional Homelessness Authority is the local government agency responsible for overseeing components of the homeless response system, such as the Continuum of Care (COC), which coordinates and plans how federal, state, and local funding will be used to address homelessness in King County. KCRHA also oversees the processes that distribute funding to COC-funded programs. These programs are responsible for implementing various housing interventions and services, including but not limited to diversion, rapid rehousing, permanent supportive housing, and emergency housing and shelter funding.

In addition to these responsibilities, KCRHA oversees system components such as the Homeless Management Information System (HMIS) and manages Coordinated Entry, "a process designed to quickly identify, assess, refer, and connect people in crisis to housing and assistance and services."² KCRHA also shares the responsibility for other services provided within a homeless response system, such as outreach and encampment resolution with our government partners, the City of Seattle and King County.

The goal of KCRHA is to coordinate homelessness services, policies, programs, and processes in the region to efficiently help people exit homelessness.

III. History of the KCRHA Ombuds Office

In 2019, the City of Seattle, King County, and All Home (the former county-wide HUD-funded Continuum of Care) partnered with the National Innovation Service (NIS) to redesign the local homeless response system. During this process, NIS collaborated with our unhoused



neighbors, people with lived experience of homelessness, providers, businesses, philanthropists, and public sector stakeholders to develop the KCRHA.

As part of this system redesign, our unhoused neighbors advocated for creating an ombuds office to help center the voices of people with lived experience in KCRHA's provision of services to those experiencing homelessness. Out of these community conversations emerged the three core functions of the Ombuds Office:

- a. Providing quality support to people experiencing homelessness in navigating, accessing, and using KCRHA services.
- b. Coordinating ongoing engagement with people experiencing homelessness and frontline service providers to ensure consistent improvements to KCRHA services.
- c. Driving systems change by centering the voices of people with lived experience and advocating for system improvements.

IV. Purpose of the Ombuds Office

The purpose of the Ombuds Office is to promote public confidence in the KCRHA's ability to serve people experiencing homelessness effectively, efficiently, and equitably. The Ombuds Office serves as an accountability mechanism within King County's homeless response system that provides system constituents with access to a fair process.

Fair process means that the Ombuds Office provides a means for constituents to voice their concerns about the services they receive or any other issues that may impact them. The Ombuds Office strives to assist constituents in understanding the reasoning behind decisions made by system actors, such as KCRHA and homeless service providers. Moreover, we work collaboratively with all parties involved to resolve complaints or issues raised by members of the public.

Aligned with its purpose, the Ombuds Office employs a hybrid approach that blends classical, organizational, and advocacy ombuds models with principles of equity to serve communities supported by KCRHA and the broader homeless response system.

V. Standards of Practice

a. Equity and Justice

The Ombuds Office is committed to eliminating institutional inequities within our homeless response system. It aims to do this by centering the experiences of our unhoused neighbors with intersecting identities, including but not limited to queer, trans, black, and indigenous people, people of color, immigrants, and people living with disabilities. The Ombuds Office will center these voices by regularly engaging



with communities across the King County region, elevating community feedback to KCRHA leadership and governance, and partnering with community members to develop solutions to their inquiries and concerns.

The Ombuds Office also works closely with our unhoused neighbors and KCRHA constituents to ensure their active involvement as informed partners. With their involvement, the office holds itself, the KCRHA, and the homeless response system accountable, by centering the voices of people who are currently experiencing or have previously experienced homelessness, in the provision of quality support, coordination of ongoing engagement, and improvement of KCRHA services through systems change.

The office's approach centers on the continuous improvement of the homelessness services offered, aiming to ensure responsiveness, equity, and effectiveness in meeting the diverse needs of communities affected by homelessness.

b. Independence

[The Interlocal Agreement \(ILA\)](#) for the Establishment of the King County Regional Homelessness Authority intended for the Ombuds Office to be a division within the authority. As a result, the Ombuds Office's independence is limited by its structure.

In this context, independence refers to the ability of the Ombuds Office to define its decision-making boundaries within the authority.

The Ombuds Office remains independent to the highest degree possible in structure and function in the following ways:

- i. The chief ombudsperson reports directly and independently to the Implementation Board twice a year.
- ii. Ombuds team members do not hold any other KCRHA positions.
- iii. The Ombuds Office has sole discretion to initiate and pursue complaints and inquiries.
- iv. The Ombuds Office has access to all KCRHA records as well as its contractor records to the extent permitted by law.
- v. The chief ombudsperson has the authority to select ombuds staff and manage the Ombuds Office budget and operations.
- vi. The Ombuds Office has the authority to establish and engage an ad-hoc advisory group, which may or may not include KCRHA staff and other



stakeholders, to provide guidance on Ombuds Office activities, findings, and recommendations.

- vii. The chief or deputy ombudsperson can report directly to the Implementation Board Executive Committee or equivalent governance or reporting structure without the prior approval of the chief executive officer or other members of executive management.

c. Impartiality in Context

The Ombuds Office endeavors to review inquiries without bias and prejudice and allow all parties involved to express their concerns. At the same time, it acknowledges that blanket statements of neutrality, fairness, and impartiality can harm individuals and groups that have been historically marginalized and can perpetuate institutional racism and inequities. The Ombuds Office commits to challenging its preconscious and conscious thought patterns that result in bias and prejudice and “actively intervene to counter personal and institutional behavior that perpetuate oppression” (Derman-Sparks, 1989).

d. Confidentiality

As a public entity, the Ombuds Office is required to comply with Washington State’s Public Records Act (PRA).³ Thus, the Ombuds Office cannot guarantee absolute confidentiality in every situation. The Ombuds Office will not reveal the identity of any person contacting the office to file a complaint, or to disclose any information provided in confidence to support a complaint, except to address an imminent risk of serious harm or when required to do so by law. If necessary to help resolve a complaint, it is at the Ombuds Office’s discretion to disclose information that does not reveal the identity of the source. That said, to the greatest extent possible, the Ombuds Office will try to get an individual’s express permission before disclosing any identifying information. The Ombuds Office will explain the risks of sharing sensitive information with those who contact the office.

VI. Core Functions, Jurisdiction, Services, Appeals and Review Processes

a. Core Functions

The ILA authorizes the Ombuds Office to perform the following functions:

- i. Gather feedback from our unhoused neighbors and people with lived experience to improve KCRHA’s operations and outcomes.
- ii. Ensure ease of contact—for community members—and provide appropriate resources to resolve concerns.



- iii. Implement strategies to collect, investigate, and respond to complaints and concerns about service delivery, policies, program administration, or other activities overseen by the KCRHA.
- iv. Receive complaints from employees and contract holders.
- v. Develop methods to respond to complaints or concerns in an equitable, impartial, and efficient manner.
- vi. Investigate complaints and issue findings, collect and analyze aggregate complaints data, and partner with KCRHA leadership, the Implementation Board, employees, and community members to design and recommend improvements to service, funding, and oversight.

b. Jurisdiction - What issues does the Ombuds Office have the authority to review?

KCRHA's Ombuds Office can review, investigate, and resolve issues in four areas: delivery of services, program administration, policies, and other activities overseen by KCRHA.

- i. Delivery of Services – The services, resources and activities provided to participants of homeless service programs.
- ii. Program Administration – The administrative responsibilities of KCRHA and its contracted service providers that include contract management, performance monitoring, compliance, and customer service.
- iii. Policies – The decisions, courses of action, protocols, or procedures implemented by KCRHA, a contracted provider, or the homeless response system to address a concern.
- iv. Other Activities Overseen by the Authority– These activities include but are not limited to system administration of continuum responsibilities such as the Coordinated Entry System or the Homeless Management Information System (HMIS).

Please note that the office is open to anyone seeking information about the homeless response system or services.

c. Who does the Ombuds Office serve?

The ILA authorizes the Ombuds Office to serve the following groups:



- i. Community members served by a KCRHA funded program.
- ii. Providers who receive funding from the KCRHA.
- iii. Employees and other contractors (not for issues related to Human Resources or People Operations).

d. Services offered by the Ombuds Office

The Ombuds Office offers the following services to respond to inquiries or resolve complaints.

- i. Information and Referral

An Ombudsperson responds to an inquiry by providing information on resources and services available in King County or redirecting to a more appropriate resource.

- ii. Assistance and Navigation

Through assistance and navigation an Ombudsperson collaborates with homeless service program participants or those seeking services to connect them with appropriate service providers or other relevant parties. The goal is to bridge any disconnect in services that exists between the program participant and service providers, ensuring that everyone involved is on the same page.

- iii. Program Review

The Ombudsperson will respond to requests for review from KCRHA staff or will initiate a request to review a program or concern when an issue doesn't arise to the level of an investigation but is something concerning enough that it warrants review by KCRHA's Program Division or another appropriate entity.

- iv. External Review

The Ombuds Office often receives complaints and concerns about homeless services that are not contracted with KCRHA. Upon receiving such complaints, the Ombuds Office documents and forwards them to the relevant external partner. The program team can use this information to



make informed decisions about the types of programs that may be eligible for KCRHA funding in the future.

v. Investigation

The Ombuds Office conducts programmatic and systemic investigations.

1. Programmatic Investigation

A programmatic investigation is a formal fact-finding process in response to a complaint or multiple complaints that bring attention to a significant concern about the delivery of services, policies, program administration, or other activities overseen by the authority related to a specific program funded by KCRHA that provides homeless related services. A programmatic investigation may derive from a single complaint, multiple complaints, or be initiated at the discretion of the Ombuds Office.

2. Systemic Investigation

A systemic investigation is a formal fact-finding process in response to a complaint or multiple complaints that brings attention to a significant concern regarding service provision in the homeless response system. Systemic investigations may derive from a single complaint, multiple complaints, or be initiated at the discretion of the Ombuds Office.

3. Investigation Determination Assessment

The Ombuds Office will complete a case assessment to determine whether an issue or complaint warrants a programmatic or systemic investigation. During the assessment, the Ombuds Office will consider various factors such as the level of seriousness, urgency, number of people affected, community concern, alignment with the Ombuds Office's priorities, and whether another agency or authority should investigate the matter.

4. Findings and Recommendations

All investigations conducted by the Ombuds Office result in a findings report that includes recommendations to improve performance,



policies, procedures, or modify practices. These reports are shared with KCRHA leadership, program management, and members of the public as applicable.

vi. **Decline or Discontinue of Ombuds-Related Services**

The Ombuds Office reserves the right to discontinue or decline an investigation or other ombuds-related service. A decision to decline or discontinue may happen for the following reasons:

1. **Unreasonable delay:** If a complaint is filed after an unreasonable amount of time has passed since the action occurred.
2. **Second-hand complaint:** Generally speaking, the Ombuds Office will not act when a person not directly affected by an issue submits a complaint. Unless there is a significant systemic problem, or the complainant is willing to help the Ombuds Office work directly with the affected person. The concerns of the person affected always take precedence in directing how the Ombuds Office will proceed.
3. **Bad Faith:** If a complaint is made in bad faith, e.g., to harass, delay, or embarrass a party or is deemed to lack merit.
4. **Lack of Jurisdiction:** If a complaint falls outside the scope of the Ombuds Office.
5. **Lack of Resources/Higher Priority Complaints:** If the Ombuds Office cannot investigate the complaint due to its current capacity or caseload.

e. Appeals and Review Process

i. **Review Process**

The review process is an opportunity to correct the record, review a service decision or recommendation, or request additional clarification on an Ombuds Office service-related action or decision. A request for review only applies to any Ombuds decisions or actions related to services offered by the Ombuds Office (e.g., intake and referral, assistance and navigation, program review). The Ombuds Office will only consider matters that were part of the initial service decision. Review decisions must be made within 30



business days from the date the Ombuds Office concludes its service-related action or decision.

1. To request a review of an Ombuds Office service-related action or decision, please email ombuds@kcrha.org with the subject line: Case Review.
 2. The team's review of the case will include a discussion with the Ombudsperson assigned to determine if the correct course of action has been implemented or if additional steps are required.
 3. The chief or deputy ombuds will reach out to the party requesting a review and explain the Ombuds Office final review decision, including the decision to reopen or close the case. All review decisions will be rendered within 30 business days from when the request to review was submitted.
- ii. Appeals Process (applies to investigations only)

Any party to an investigation may request that the Ombuds Office reconsider its initial recommendations and findings through the appeals process.

1. Any party to an Ombuds Office investigation may appeal the findings and recommendations of the findings report.
2. Please refer to the [Ombuds Office Grievance Policy](#) for information on how to file an appeal.
3. Any contested findings will be carefully evaluated by a committee of KCRHA staff members from different divisions within the agency who are not directly involved in the investigation or have any direct oversight over the parties or issues under review. The Ombuds Office may also share contested findings with the Implementation Board Executive Committee or equivalent governance or reporting structure to review the Ombuds Office findings and recommendations.

VII. Limits of the Ombuds Office

The Ombuds Office is intended to supplement, not replace, the KCRHA's formal compliance and complaint channels, such as those created by People Operations. Employees of the KCRHA are encouraged to use the Ombuds Office when any personnel issues arise for



confidential coaching and support on how to use the previously mentioned channels effectively. Nothing in this current section should be used to prevent an employee from raising a concern about service delivery, policies, program administration, or any other activities overseen by KCRHA.

Furthermore, the Ombuds Office does not, nor should it be expected to:

- a. Address or investigate issues outside its jurisdiction.
- b. Make, change, or set aside the law, policy, administrative, or managerial decisions.
- c. Make binding decisions or determine rights.
- d. Directly compel an entity or any person to implement the office's recommendations.
- e. Receive notice on behalf of the KCRHA.
- f. Address any issues arising within the purview of any existing federal, state, or local labor or employment law, rule, or regulation.
- g. Investigate matters currently in litigation or covered by a collective bargaining agreement or complaints related to employee or applicant discrimination.

VIII. Safety from Retribution or Retaliation for Using the Ombuds Office

Contacting the Ombuds Office is entirely voluntary. Any group within its jurisdiction has the right to contact the Ombuds Office without fear of retaliation from the KCRHA or its agents, including:

- a. Community members using services overseen or funded by the KCRHA.
- b. Employees and contractors of the KCRHA.
- c. Providers who implement services overseen or funded by the KCRHA.

IX. Data Collection and Reporting

- a. Intake. The Ombuds Office collects demographic information such as race and ethnicity, gender identity, location, referral source, and ombuds service-related outcomes. The office maintains case notes to help document each ombudspersons' interactions and how the office addresses issues and concerns.
- b. Annual Reports. The Ombuds Office uses information collected during the intake process, investigations, and community engagement to inform an annual report on system trends and responses to community feedback.



X. Appointment and Removal from Office

- a. The chief ombudsperson will be selected and appointed by the chief executive officer and director of people operations.
- b. The chief ombudsperson may be removed from the office for neglect of duty, misconduct, inability to perform tasks, and actions or behaviors not aligned with KCRHA values or code of conduct.

XI. Conflict of Interest

A conflict of interest is when an ombudsperson has an actual or potential interest that impairs or might impair their ability to perform their responsibilities and duties in alignment with the Ombuds Office's standards of practice. If there is a potential conflict of interest, the ombudsperson will let the chief ombudsperson or deputy ombudsperson know and will not take part in any ombudsperson-related actions, such as investigations, if necessary.

All Ombuds Office staff must:

- a. Abide by [KCRHA's Code of Ethics Policy](#).
- b. Report to the Implementation Board Executive Committee, or equivalent governance or reporting structure, and the director of people operations (or equivalent position) if a conflict of interest is discovered during an investigation. The director of people operations and the Implementation Board Executive Committee or equivalent governance or reporting structure will determine if the conflict can be managed or should be eliminated. The chief or deputy ombudsperson is responsible for determining the appropriate entity to report to based on the circumstances of a conflict of interest.

All Ombuds Office staff may:

- c. Participate on community and advisory committees as non-voting members unless doing so creates a conflict of interest.

XII. Document Revision History

Implementation Date	2/23/2024
Last Reviewed/Update Date	2/23/2024



¹ [What is a homeless response system? - Community Solutions](#)

² [Crisis Response - National Alliance to End Homelessness](#)

³ The Washington Public Records Act requires that all public records maintained by state and local government agencies be made available to all members of the public with very narrow statutory exemptions. (See Chapter 42.56 RCW)



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