

# Seattle/King County Continuum of Care Community Standards

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THIS DOCUMENT CONTAINS THE CONTINUUM OF CARE (COC) POLICIES AND PROCEDURES THAT GUIDE AND INFORM THE SERVICES PROVIDED TO THOSE WHO ARE EXPERIENCING HOMELESSNESS IN KING COUNTY. THE MOST CURRENT VERSION OF THIS DOCUMENT CAN BE FOUND AT [WWW.ALLHOMEKC.ORG](http://WWW.ALLHOMEKC.ORG).

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## I. Introduction

### A. Purpose of the Community Standards

These Community Standards (Standards) are intended to support the Seattle/King County Continuum of Care (CoC) by offering a guiding framework for homeless housing and service providers and funders. They represent the standards of service delivery for our community and serve as a guide for the implementation and operation of housing and services specifically targeted to address homelessness in the region. They are designed to comply with the federal [Homeless Emergency Assistance and Rapid Transition to Housing \(HEARTH\) Act](#) and are subject to annual review and update.

These standards provide an additional benefit to the community, ensuring contractual requirements are aligned across common best practices and racial equity. More specifically:

- The **Continuum of Care** fulfills their responsibility to the Federal Department of Housing and Urban Development and explicitly operationalizes local values and a common philosophy of care.
- Local **Funders** utilize a common reference for key requirements and tools to support monitoring and technical assistance activities.
- **Providers of homeless housing and services** can refer to common expectations from funders with minimal variations between contracts for greater ease of reference and compliance.
- **People with lived experience** have a more common experience across programs and can expect similar approaches in services. The standards will also be available online for greater transparency and knowledge of consumer rights and responsibilities.

### B. Core Community Values and Goals

All Home, the Seattle/King County CoC is guided by the following vision: that homelessness is RARE in King County, racial DISPARITIES are eliminated, and if one becomes homeless, it is BRIEF and only a ONE-TIME occurrence.

The guiding principles of the All Home Strategic Plan provide a foundation for collective action:

- Involve the full community, including those experiencing homelessness
- Promote equity and social justice in funding and program design to address regional and racial disparities
- Address a person's unique needs and strengths by prioritizing appropriate housing stability mechanisms
- Prioritize those whose health and safety are most vulnerable
- Move people into housing first, and employment fast, by progressive engagement in services
- Utilize data-driven assessment of needs and outcomes to drive policy and investments

The work of All Home, partner funders and local providers serving people experiencing homelessness are further guided by the following values:

- **Housing First** – Homeless housing and services are targeted and prioritized to the most vulnerable people in our community and are offered without conditions. Barriers to accessing and maintaining housing and services are low to ensure those who need the resources most are able to utilize them. Housing First is not an approach solely utilized by Permanent Supportive Housing or other permanent housing approaches. Housing First can be integrated in all homeless housing and service interventions, including outreach, prevention, emergency shelter, transitional housing, and rapid re-housing. Systemically, Housing First also includes the coordination of access and entry into homeless housing (locally, Coordinated Entry for All) and

the prevention of returns to homelessness through coordination and flexibility across programs to ensure people are receiving the resources they need.

- **Racial Equity** – Nearly two thirds of people experiencing homelessness are people and families of color. Institutional and systematic racism contributes to the oppression of people of color, creating inequity, poverty and in some cases, homelessness. Success in reducing racial disparities and creating effective systems both for a dignified emergency response and housing, will require bold action and shared accountability. This commitment will include the proactive reinforcement of policies, practices, attitudes and actions to produce equitable power, access, opportunities, treatment, impacts and outcomes for all.
- **Data Driven Governance and Accountability** – Ensuring all systems and strategies are working towards reducing the number of people who newly experience homelessness, shortening the length of time people experience homelessness, increasing the rate in which people attain and maintain permanent housing, ensuring services are being targeted to the most vulnerable and are fully being utilized, and eliminating disparities by race in outcomes is a commitment and requirement of the CoC.

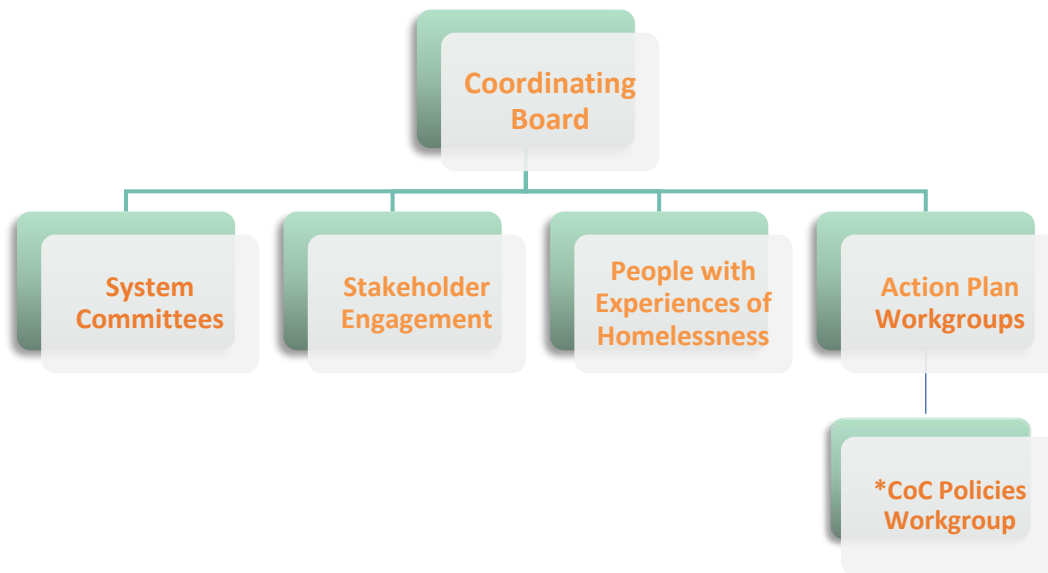
Through accurate and timely data entry into the Homeless Management Information System (HMIS), our community will improve services to people experiencing homelessness by providing accurate information on the extent and nature of homelessness in our community and by accounting for our success in helping people move out of homelessness. Seattle/King County is committed to collecting and analyzing high-quality data to 1) Review and evaluate results; 2) Support evidence-based and data-driven practices that promote on-going evaluation of the system; and 3) using program data for continuous process improvement that informs funding and resource allocation decisions. While data collection and analysis through HMIS is critical to this work, utilizing people’s experiences and other qualitative data sources is critical in ensuring a robust narrative of what is and is not working.

- **Person-Centered Services** – Grounded in a trauma-informed orientation which recognizes and responds proactively to the trauma experienced by people living without housing is a critical foundation to providing person-centered services. Motivational interviewing techniques provide tools in working with people through their journey from homelessness to housing. Person-centered services are also operationalized by ensuring programs are nimble and flexible to address the unique needs and strengths of all people with whom they work. Programs should be made adaptable to serve the most vulnerable, screening in households and individuals that most need services (as opposed to screening out households who may not necessarily match a specific ‘profile’).

These values guide each policy and procedural statement in these standards, centering the experience of people experiencing homelessness and ensuring maximum impact and the reduction of harm, particularly for communities of color. It is the expectation of the Continuum of Care that the above values are integrated in program operations and are intentionally part of the operational design of services and interventions.

### C. How Policies Were Developed

The standards were developed by a time-limited workgroup\* (within the CoC governance structure; see image below) for approval by the [Coordinating Board](#) and adoption by agencies serving people experiencing homelessness in the Seattle/King County region. Initial efforts focused on reviewing all existing regulations and funding requirements of funds administered by King County Department of Community and Human Services, City of Seattle Human Services Department, United Way of King County, and Suburban City Human Services. *[A second phase of work includes reviewing all developed policies for opportunities for further elaboration on best practices, refining policies to ensure they lead with racial equity, and developing policies where local precedence was missing.]*



The Standards were developed through a community process that included:

- Input from funders and providers;
- Guidance and leadership from people with experiences of homelessness;
- Review of national standards and best practices; and
- Compilation of existing grant/funder policies and procedures.

The following guiding principles were adopted by the CoC Policy Workgroup to ensure the development of this tool aligned with core values of the community.

- People with lived experiences, funders and providers will be involved in the development and revision of continuum-wide policies.
- Racial equity principles will be integrated through project development and implementation.

CoC Policy Workgroup Members:

Jean-Paul Yafali, All Home  
 Brooke Buckingham, City of Redmond  
 Eileen Denham, City of Seattle HSD  
 Kate Speltz, King County DCHS  
 Stacia, Consumer Advisory Council Member  
 Michelle Valdez Consulting, Consultant

Merina Hanson, City of Kent  
 Adrienne Easter, City of Seattle HSD  
 Janice Hougen, King County DCHS  
 Lisa Brooks, United Way of King County  
 Jenna, Youth Action Board Member  
 Thalia, Youth Action Board Member  
 Triina Van, All Home, Project Manager

## D. Racial Equity Analysis Conducted in the Development of Standards

The All Home Strategic Plan commits to reducing racial disparities of those experiencing homelessness. This commitment to racial equity will include the proactive reinforcement of policies, practices, attitudes and actions to produce equitable power, access, opportunities, treatment, impacts, and outcomes for all.

The following equity affirming strategies were employed in the development and implementation of the CoC Policies:

- **Leadership and consultation from people with lived experience:** Members of the All Home Consumer Advisory Council (CAC) and Youth Action Board (YAB) participated on the CoC Policies Workgroup. CAC and YAB bodies reviewed and provided guidance to all developed policies.
- **Development of racial equity outcomes:** CoC Workgroup members developed the following racial equity outcomes to serve as benchmarks and guides for the development of the CoC Policies:
  - The CoC Standards will:
    - Consider and acknowledge the historical context and existing, explicit policies that impact people of color and how they contribute to the disproportionate representation among people of color experiencing homelessness.
    - Explicitly serve communities of color (including a review of existing policies which do not) and will identify the positive and affirming impacts on racial equity.
    - Include leadership opportunities for people of color representing communities most historically marginalized.
- **Utilize a racial equity tool to review each developed policy:** Each policy will be vetted with a racial equity tool to ensure the policy will maximize impact and minimize harm for people of color. *(Will occur prior to final iteration.)*
- **Evaluate impact:** The System Performance Committee will continue to evaluate housing outcomes and system impacts, disaggregated by race. Any identified unanticipated consequences possibly resulting from a policy change will be communicated to the Coordinating Board for further review and action.

See Appendix D, Racial Equity Analysis for more details.

## E. Requirements

For the benefit of program participants, once adopted by the Coordinating Board, the Standards will be applied to relevant programs through funding contract requirements: *(To be developed)*

Agencies wishing to apply for funding applicable under these standards must demonstrate alignment to and use of the minimum standards outlined in subsequent (and applicable) agency, program and program-model policies and procedures.

## F. How to Use This Document

This document is divided into the following sections:

- **System-level: Continuum of Care Standards & Requirements:** This section applies to CoC systems and requirements such as CoC Governance, Coordinated Entry for All (CEA) Policies, Homeless Management Information System (HMIS) Policies, and other system requirements from which the Continuum of Care operates.

- **Agency-Level Policies and Procedures:** This section applies to all homeless housing and services agencies. Agencies will utilize this section to address agency-wide policy and practice requirements.
- **Program-Level Policies and Procedures:** This section applies to all homeless housing and services programs. Agencies and programs will utilize this section to address program-specific policy and practice requirements (in addition to agency-level policies and procedures).
- **Program Models:** This section applies to specific program types that applicable programs will utilize for program-model policy and practice requirements (in addition to agency and program-level policies and procedures).

All policies and practices are mandatory requirements as noted above. Standards demarcated as “\*Preferred Practice Recommended Standards” represent preferred community practices above and beyond the basic standards and requirements. *[Programs are encouraged to implement Preferred Practice Recommended Standards whenever possible]*

*\*to be developed in Phase 2*

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## July 2018 Interim Policies

Community Standards Revisions: This document will be considered a living document subject to change. Changes to this document will be made in response to changing conditions, regulations and/or the will of the CoC. Changes after initial approval will be presented at an All Home Coordinating Board meeting for approval and adoption. Updated policies and procedures will be posted on the All Home website at [www.allhomkc.org](http://www.allhomkc.org).

## II. System-level: Continuum of Care Standards & Requirements

The following section summarizes local system-level standards which comply with Federal and State policies and requirements. These are required for Continuums of Care across the country and have been adapted to support local priorities.

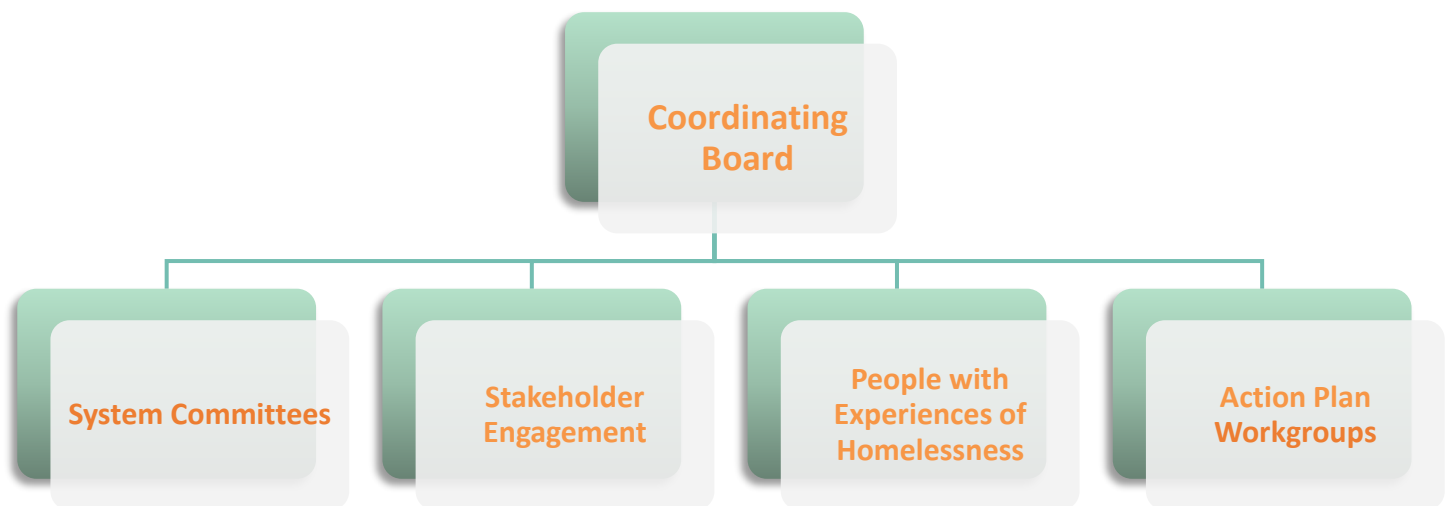
### A. CoC Governance (Oversight, Coordination, and Planning)

#### Background

Per the U.S. Department of Housing and Urban Development (HUD) requirements detailed in 24 CFR part 578.1, a CoC board shall develop policies and procedures that: designate a CoC Lead Agency to serve as the Collaborative Applicant to operate the Continuum of Care, designate an Administrator of the Homeless Management Information System, and conducts year-round Continuum of Care planning of homeless and homeless prevention housing and services.

In accordance with the Homeless Emergency Assistance and Rapid Transition to Housing (HEARTH) Act and in accordance with King County Ordinance 2005-0371.1, All Home is designated as the local homeless housing task force (Continuum of Care) pursuant to Sections 3(9) and 8 of Chapter 484, Laws of Washington 2005. All Home is the broad Continuum of Care for the purposes of identifying needs regarding homeless persons, planning for resources to end homelessness, and advocating for additional solutions to end homelessness. All Home, as a regional coalition is hosted at the King County Department of Community and Human Service for the purposes of All Home staffing and budget activities.

The activities of the Continuum of Care are guided by the All Home Strategic Plan and are carried out by All Home staff and the organizational chart outlined below.



#### Rationale

A highly functioning organizing and oversight body is critical to ensuring an effective response to homelessness. It ensures an efficient use of coordinated funding and transparency in actions. Decision making is clear and responsible members are held accountable to the collective plan and outcomes agreed upon by the community.

## Policy

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As the governing body, the Coordinating Board Provides oversight and leadership for the implementation of the Plan while ensuring accountability for results, and acts as the Board for the CoC as defined in the CoC interim rule section 578.5 (b).

The Coordinating Board shall:

- Provide oversight and leadership for the implementation of the Plan, while ensuring accountability for results.
- Organize to provide for a system of housing and services to address the needs of people experiencing homelessness in King County.
- Bring together a diverse body of stakeholders working to address issues of homelessness and leverage the expertise and resources of the partners and the wider community in collaborative support of the Plan.

## Links to additional documents

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See the All Home Charter for details on the roles and responsibilities of the CoC and Board.

<http://allhomekc.org/wp-content/uploads/2015/09/All-Home-Charter-updated-March-2017.pdf>

CoC interim rule section 578.5 (b)

[24 CFR Part 578 - CoC Duties: Establishing and Operating a Continuum of Care](#)

[hudexchange.info/resources/documents/EstablishingandOperatingaCoC\\_CoCProgram.pdf](http://hudexchange.info/resources/documents/EstablishingandOperatingaCoC_CoCProgram.pdf)

## B. HMIS Standards

### Background

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The Homeless Management Information System (HMIS) is a countywide data management tool designed to facilitate data collection to improve service delivery throughout King County.

Participation in the Homeless Management Information System (HMIS) is a Federal, State and local requirement (specific information is outlined in the link below). System performance on HEARTH indicators are used to ensure improved responses for people experiencing homelessness utilizing HMIS data (See System Performance Measures Policy).

### Rationale

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In addition to fulfilling Federal and State requirements, fully participating in and ensuring accurate data collection in HMIS has many other benefits:

- Improving the coordination of services for people participating in programs
- Streamlining the fulfillment of documentation requirements (particularly length of time homeless and chronicity) for people participating in programs/seeking to access resources
- Organizations evaluating program performance and exploring potential unintended disparities in outcomes.
- Evaluating system performance over time and ensuring progress and intentionality of system change efforts
- Continuum of Care competitiveness for federal funding (regardless of a program's receipt of federal or public funding)

Following strict policies and procedures (outlined in subsequent sections) is critical in ensuring the privacy of confidential information and protecting program participants' privacy and identity.

### Policy

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#### HMIS Administration:

- King County administers the HMIS;
- Bitfocus, Inc. is the HMIS vendor for King County, and uses Clarity Human Services software. Bitfocus' responsibilities include data quality and technical support. Additional information is available from Bitfocus' local website (<http://kingcounty.hmis.cc/>).
- The System Performance Committee is responsible to provide oversight to the implementation of HMIS, guiding the administration of the Homeless Management Information System (HMIS), to ensure that it is functional and meets local needs for data collection and reporting as well as U.S. Department of Housing and Urban Development (HUD) HMIS standards.

### Links to additional documents

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Full HMIS Policies and procedures can be found here: <http://kingcounty.hmis.cc/client-forms/>

## C. Housing First Standards

### Background

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Housing first is an approach designed to assist people experiencing homelessness in returning to permanent housing as quickly as possible without a “housing readiness” test, or other conditions to enter housing. Programs in a housing first homeless system empower homeless people to overcome barriers to obtaining permanent housing. Support services are voluntary but can and should be used to persistently engage tenants to ensure housing stability. A housing first system does not require that households spend time in a shelter or graduate from a transitional housing program to receive permanent supportive housing, although many households will enter housing from a shelter. To achieve a housing first system orientation, homeless housing units in the system must reduce screening barriers and screen in homeless households, many of whom may have barriers that traditionally make it more difficult for them to rent in the private market.

A Housing First approach is adopted at agency and program levels and is an orientation to system practices. Originally designed as a model for implementing Permanent Supportive Housing, Housing First is now strongly endorsed as an approach for all homeless housing interventions and at a systems-level.

### Rationale

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Utilizing a Housing First orientation at the system level is a core value of the Continuum of Care for the following reasons:

- Low barrier access to resources ensures the most vulnerable have access to needed and relevant services.
- Low barrier access to housing affirms Fair Housing and reduces barriers for people of color and people living with disabilities who are disproportionately impacted by discriminatory screening practices (for example, people of color are disproportionately impacted by discriminatory practices that lead to higher rates of criminal backgrounds which further limits access to housing).
- The coordination of access to resources ensures resources are fully utilized and improves the efficiency and effectiveness of targeting limited resources to the most vulnerable households.
- Reducing barriers to maintaining housing and ensuring services are coordinated ensures people will be less likely to return to homelessness if a program is not a good fit for their needs or priorities.

### Links to additional documents

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<https://www.usich.gov/solutions/housing/housing-first>

<https://www.usich.gov/tools-for-action/housing-first-checklist>

<https://www.hudexchange.info/resource/1723/housing-first-a-key-coc-component/>

## D. Racial Equity Standards

### Background

The National Alliance to End Homelessness [reports](#) most communities of color in the United States experience homelessness at higher rates than whites. For instance, African Americans make up 13% of the general population, but more than 40% of the homeless population. They additionally note that racial and ethnic disparities in homelessness are not improving over time. In fact, in recent years, African Americans make up the largest share of all people who access shelter, and that proportion of the shelter population has increased in recent years, while the share for Whites has declined.

All Home's vision is that homelessness is rare in King County, racial disparities are eliminated, and if one becomes homeless, it is brief and only a one-time occurrence. In 2016, the CoC's Coordinating Board adopted the following commitment statement to address racial equity at the planning and governance levels: *Nearly two thirds of people experiencing homelessness are people and families of color. Institutional and systematic racism contributes to the oppression of people of color, creating inequity, poverty and in some cases, homelessness. Success in reducing racial disparities and creating effective systems both for a dignified emergency response and housing, will require bold action and shared accountability. This commitment will include the proactive reinforcement of policies, practices, attitudes and actions to produce equitable power, access, opportunities, treatment, impacts and outcomes for all.*

### Rationale

People of color and American Indian and Alaska Natives experience homelessness at disproportionate rates as compared to their numbers in the greater population. This is a result of lasting historical and continued oppression. Addressing disparities within the homeless system and the results of discriminatory practices in other systems is key in resolving homelessness across all populations.

### Policy

- All Home maintains public dashboards on system performance, disaggregated by race to examine outcome disparities.
- The Coordinating Board is responsible for establishing policies and prioritizing strategies addressing racial equity.
- The System Performance Committee is responsible for reviewing system performance, disaggregated by race, to elevate identified disparities to the Coordinating Board for further action.
- All Home governance ensures communities of color and those historically marginalized are represented at leadership and decision-making bodies.
- All Home and CoC members are responsible for identifying strategies to operationalize (and then execute) racial equity in planning and implementation work.

## E. System Performance Measures

### Background

The federal Homeless Emergency Assistance and Rapid Transition to Housing (HEARTH) Act requires that each Continuum of Care (CoC) establish targets and show annual progress in achieving those targets towards reducing homelessness. HUD uses system-level performance measures to help communities gauge their progress in preventing and ending homelessness along with ensuring that housing placements are also stable. Projects funded by the Continuum of Care Program have the following standard performance measures for housing and income reported in the Annual Performance Report (APR): (a) persons remaining in permanent housing as of the end of the operating year or exiting to permanent housing destinations during the operating year; and (b) adults who maintained or increased their total income (from all sources) as of the end of the operating year or project exit.

The Collaborative Applicant is responsible for collecting and reporting Continuum of Care System Performance Measures. The measures include:

- Length of time persons remain homeless;
- The extent to which persons who exit homelessness to permanent housing destinations return to homelessness;
- Number of homeless persons;
- Jobs and income growth for homeless persons in CoC Program-funded projects;
- Number of persons who become homeless for the first time;
- Homelessness prevention and housing placement of persons defined by Category 3 of HUD's homeless definition in CoC Program-funded projects; and
- Successful housing placement.

### Rationale

The purpose of these measures is to provide a more complete picture of how well our community is preventing and ending homelessness. System Performance Measures are designed to help our community improve services to people experiencing homelessness by providing accurate information on the extent and nature of homelessness in our community and by accounting for our success in helping people move out of homelessness. Improved System Performance is critical to meeting the homeless crisis and to the Seattle/King County Continuum of Care's success.

### Policy

Each agency is expected to meet the Seattle/King County Continuum of Care Minimum and Target Performance Standards below per the [Memorandum of Agreement process](#) outlined and as outlined in individual contracts. Programs not meeting any of the Minimum Performance Standards will be required to develop a technical assistance plan with their Program Specialist. The implementation of uniform Minimum and Target Performance Standards is designed to clarify expectations and provide an opportunity for targeted technical assistance.

**Performance targets are not intended to drive program design.** For instance, length of stay targets are not intended to imply that programs should establish length of stay requirements. Additionally, programs should not increase selection criteria of program participants to identify households "more likely to succeed" or to improve program outcomes. These practices are the antithesis of the core system values which should be driving program design. A key point to the theory of change in these efforts is leading with Housing First, Racial Equity and Person-Centered Services approaches will improve program outcomes.

## Performance Standards

Minimum Performance Standards					
Project Type	Core Outcomes			Entries from Homeless-ness	Utilization Rate
	Exit Rate to PH	Length of Stay	Return Rate to Homeless-ness		
Emergency Shelter	40% Singles 65% Families 35% (Youth & Young Adults)	90 days (Singles & Families) 30 (Youth & Young Adults)	10% (Singles & Families) 20% (Youth & Young Adults)	90%	85% (Singles & Families) 90% (Youth & Young Adults)
Transitional Housing	80%	150 days (Singles & Families) 270 (Youth & Young Adults)	10% (Singles & Families) 20% (Youth & Young Adults)	90%	85%
Rapid Rehousing	80%	180 days	5% (Singles & Families) 20% (Youth & Young Adults)	90%	NA
PSH	90%	NA	5% (Singles & Families) 20% (Youth & Young Adults)	90%	85%

Target Performance Standards					
Project Type	Core Outcomes			Entries from Homeless-ness	Utilization Rate
	Exit Rate to PH	Length of Stay	Return Rate to Homeless-ness		
Emergency Shelter	50% (Singles and Youth & Young Adults) 80% (Families)	30 days (Singles & Families) 20 days (Youth & Young Adults)	8% (Singles & Families) 5% (Youth & Young Adults)	90%	95%
Transitional Housing	85%	90 days (Singles & Families) 180 (Youth & Young Adults)	8% (Singles & Families) 5% (Youth & Young Adults)	95%	95%
Rapid Rehousing	85%	120 days	3% (Singles & Families) 5% (Youth & Young Adults)	95%	NA
PSH	90%	NA	3% (Singles & Families) 5% (Youth & Young Adults)	95%	95%

Links to additional documents

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[http://allhomekc.org/wp-content/uploads/2016/01/Signed-MOU\\_FINAL.pdf](http://allhomekc.org/wp-content/uploads/2016/01/Signed-MOU_FINAL.pdf)

<https://kingcounty.gov/depts/community-human-services/contracts/requirements/CSDReq.aspx>

The System Performance Committee, a part of the All Home governance body is charged with using data to measure the performance of the homeless system to identify successes and opportunities for improvements for people experiencing homelessness **and for providing guidance on methodological changes to system performance metrics.**

## F. System-wide Coordination & Prioritization (Coordinated Entry for All)

### Background

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Provisions in the CoC Program interim rule 24 CFR 578.7(a)(8) require that CoC's establish and operate a Centralized or Coordinated Assessment System that provides an initial, comprehensive assessment of the needs of individuals and families for housing services. Both HUD CoC and ESG projects must participate in the local coordinated entry system.

In King County, Coordinated Entry for All is the centralized system for assessment and referral to local homeless housing and services. Operation and management of the CEA, including housing assessment, community prioritization, and program referral, is provided by King County DCHS, the "Coordinating Entity." The CEA Policy Advisory Committee is part of the All Home governance structure and provides oversight and accountability to the implementation of CEA, including a review of recommended policy changes, conducting racial equity analysis and evaluating performance, and developing recommendations to improve effectiveness and efficiency of CEA.

### Rationale

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The purpose of Coordinated Entry for All (CEA) is to ensure that all people experiencing homelessness have fair and equal access to housing. The system aims to work with households to understand their strengths and needs, provide a common assessment, and connect them with housing and homeless assistance. Using standardized tools and practices, CEA aims to incorporate the principles of a system-wide housing first approach and prioritize those with the highest service needs.

### Links to additional documents

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See CEA Policies for detailed policies and procedures: <https://kingcounty.gov/depts/community-human-services/housing/services/homeless-housing/coordinated-entry/providers.aspx>

CoC Interim Rule, § [578.23\(c\)\(9\)](#); this citation is found on page 67 of the formatted version of the CoC Interim Rule

ESG Interim Rule, § [576.400\(d\)](#)

### III. Agency-level Policies & Procedures

To best meet the needs of the community and to comply with local and federal regulations, the following policies and procedures have been established to ensure consistent practice across the CoC.

#### A. Auditing Requirements

Background

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***To Be Developed - Phase 2***

Rationale

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Policy Statement

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Procedures

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Documentation

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## B. Conflict of Interest

### Background

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An organizational conflict of interest arises when, because of activities or relationships with other persons or organizations, the program is unable or potentially unable to render impartial assistance in the provision of any type or amount of assistance, or when a covered person's objectivity in performing work with respect to any activity assisted is or might be otherwise impaired. Such an organizational conflict would arise when an employee of a program participates in making rent reasonableness determinations and housing quality inspections of property that the Program or a related entity owns.

### Rationale

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Abiding by Conflict of Interest policies is a practice that ensures operational best practices, is a characteristic of sound, fiscal stewardship, and ultimately protects the rights of program participants by ensuring resources are utilized in a fair manner.

### Policy Statement

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- Agencies shall maintain a written code or standards of conduct that shall govern the performance of its officers, employees or agents engaged in the award and administration of contracts supported by local or federal funds;
- No employee, director, officer or agent of the Agency shall participate in the selection or in the award, or administration of a contract supported by federal funds if a conflict of interest, real or apparent, would be involved. By way of example, such a conflict would arise if such a person, or his or her employer, immediate family member or partner has financial or other interest in the entity selected; and
- No covered persons who exercise or have exercised any functions or responsibilities with respect, or who are able to participate in a decision-making process or gain inside information about such activities, may have or obtain a financial interest in any contract, subcontract or agreement regarding, either for themselves or those with whom they have business or immediate family ties, during their tenure or and one year thereafter. For purposes of this paragraph, "covered person" includes any person who is an employee, agent, consultant, officer, or elected director of the Agency or the County.

### Other Conflict of Interest Requirements

No covered person may obtain a financial interest or benefit from an assisted activity, have a financial interest in any contract, subcontract, or agreement with respect to an assisted activity, or have a financial interest in the proceeds derived from an assisted activity, either for him or herself or for those with whom he or she has immediate family or business ties, during his or her tenure or during the one-year period following his or her tenure.

### Documentation

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The recipient agency and its subrecipients must keep records to show compliance with the following:

- Organizational conflict of interest (in 24 CFR part 578.95(c)),
- Other conflict of interest requirements (in 24 CFR part 578.95(d))

In addition, agencies must maintain a copy of the personal conflict of interest policy developed and implemented to comply with the requirements at 24 CFR part 578.95, along with records supporting any exceptions to the personal conflict of interest prohibitions.

CoC/ESG Interim Rule Citation

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CoC Interim Rule, § [578.95](#); this citation is found on page 105 of the formatted version of the CoC Interim Rule

ESG Interim Rule, § [576.404](#)

## C. Domestic Violence (DV)/Violence Against Women Act (VAWA)

### Background

The Violence Against Women Act final rule ([VAWA Final Rule](#), 24 CFR, Part 5, Subpart L) codifies the core protection across HUD's covered programs ensuring survivors are not denied assistance as an applicant, or evicted or have assistance terminated as a tenant, because the applicant or tenant is or has been a victim of domestic violence, dating violence, sexual assault, and stalking.

### Rationale

All efforts shall be made to protect the rights, privacy and safety of survivors of domestic violence, dating violence, sexual assault or stalking (hereinafter "domestic violence survivors"). To protect survivors in situations like these, the final rule prohibits any denial, termination, or eviction that is "a direct result of the fact that the applicant or tenant is or has been a victim of domestic violence, dating violence, sexual assault, or stalking, if the applicant or tenant otherwise qualifies for admission, assistance, participation, or occupancy."

### Policy Statement

- Agencies/programs which primarily serve survivors of violence are prohibited from contributing client-level data into the HMIS System. However, these programs must record client level data within a comparable internal database and be able to generate aggregate data for inclusion in reports.
- Non-victim service providers shall protect the privacy of individuals and families who are fleeing, or attempting to flee violence, by not including intake/treatment data in HMIS.
- The location of Domestic Violence shelters/programs shall not be made public, if applicable.
- No agency or program will deny or terminate assistance or evict a participant solely because they are a domestic violence survivor. Nor shall an agency deny a survivor on the basis that the agency does not provide domestic violence programming or services. Agencies shall support survivors in accessing needed and requested services related to their incident of domestic violence while in housing (for example, a non-victim service provider can work with a survivor to locate advocacy and community-based domestic violence resources to assist in safety planning).
- *Emergency Transfers.* One of the key elements of VAWA's housing protections is the emergency transfer plan which allows for survivors to move to another safe and available unit if they fear for their life and safety. Recipients and subrecipients of grants for tenant-based rental assistance may use grant funds to pay amounts owed for breaking the lease if the family qualifies for an emergency transfer under the emergency transfer plan established under §578.99(j)(8). Programs must follow the established CoC-wide emergency transfer plan for those in CoC and ESG programs fleeing domestic violence.

### Procedures

The following procedures are required for any CoC-funded programs (regardless of DV status):

- Agencies/programs must distribute the [VAWA Notice of Occupancy Rights](#) to every participant who is applying for permanent housing assistance.
- Agencies/programs must distribute both the [VAWA Notice of Occupancy Rights](#) and the [Certification of Domestic Violence form](#) in the following situations:

- When an individual or family is denied permanent housing or transitional housing;
- When a program participant is admitted to permanent housing or transitional housing;
- When a program participant receives notification of eviction; and
- When a program participant is notified of termination of assistance.
- When grant funds are used for rental assistance, the agency/program must ensure that the owner or manager of the housing provides the [VAWA Notice of Occupancy Rights](#) and [Certification of Domestic Violence form](#) to the program participant with any notification of eviction. This requirement for the landlord must be specified in the contract between the program and landlord.
- Agencies/programs must include the following provisions in any contract or lease between the program and landlord:
  - Requirement that program and landlord follow the terms of the [VAWA Final Rule](#)
    - This term may be narrowed to specify this requirement is for only as long as CoC/ESG assistance is being contributed to the unit
  - VAWA Confidentiality Requirements:
    - Any information submitted to the program or landlord, including the fact that an individual is a victim of domestic violence, dating violence, sexual assault, or stalking (confidential information), shall be maintained in strict confidence.
    - The program shall not enter confidential information into any shared database or disclose to another entity, except to the extent that the disclosure is: (i) Requested or consented to in writing by the individual in a time-limited release (ii) Required for use in an eviction proceeding or hearing regarding termination of assistance from the covered program; or (iii) Otherwise required by applicable law

## Documentation

Agency documentation should include:

- Signed acknowledgement of receipt of the VAWA Notice of Occupancy by the applicant/participant.
- Signed acknowledgment (when possible) of receipt of the VAWA Notice of Occupancy and Certification of Domestic Violence form for applicants and participants per the policy above.
- When applicable, MOU or lease agreement between the agency and landlord regarding compliance with the distribution of the VAWA Notice of Occupancy and Certification of Domestic Violence forms.

## ***Moves for victims of domestic violence, dating violence, sexual assault, and stalking.***

For each program participant who moved to a different Continuum of Care due to imminent threat of further domestic violence, dating violence, sexual assault, or stalking under § 578.51(c) (3), each recipient or subrecipient of assistance under this part must retain:

- Documentation of the original incidence of domestic violence, dating violence, sexual assault, or stalking, only if the original violence is not already documented in the program participant's case file. This may be written observation of the housing or service provider; a letter or other documentation from a victim service provider, social worker, legal assistance provider, pastoral counselor, mental health provider, or other professional from

whom the victim has sought assistance; medical or dental records; court records or law enforcement records; or written certification by the program participant to whom the violence occurred or by the head of household.

- Documentation of the reasonable belief of imminent threat of further domestic violence, dating violence, or sexual assault or stalking, which would include threats from a third-party, such as a friend or family member of the perpetrator of the violence. This may be written observation by the housing or service provider; a letter or other documentation from a victim service provider, social worker, legal assistance provider, pastoral counselor, mental health provider, or other professional from whom the victim has sought assistance; current restraining order; recent court order or other court records; law enforcement report or records; communication records from the perpetrator of the violence or family members or friends of the perpetrator of the violence, including emails, voicemails, text messages, and social media posts; or a written certification by the program participant to whom the violence occurred or the head of household.
- Data on emergency transfers requested under 24 CFR 5.2005(e) and § 578.99, pertaining to victims of domestic violence, dating violence, sexual assault, or stalking, including data on the outcomes of such requests.

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#### CoC/ESG Interim Rule Citation

[VAWA Final Rule](#), 24 CFR, Part 5, Subpart L

## D. Drug-free Workplace Policy

### Background

Under the [Drug-free Workplace Act of 1988](#) a drug-free workplace policy is required for any organization that receives a federal contract of \$100,000 or more or any organizations receiving a federal grant of any size (note- sub-recipients and sub-contractors may not be directly required to have the policy, but the recipient may pass this requirement onto its sub-recipients for covered HUD-funded projects).

### Rationale

The Drug-Free Workplace Policy fulfills Federal and State requirements.

### Policy Statement

In accordance with the Drug-Free Workplace Act of 1988 (41 U.S.C 701), agencies and their subcontractors will provide a drug-free workplace, and will have processes in place to 1) publish a statement notifying employees that the unlawful manufacture, distribution, dispensing possession or use of a controlled substance is prohibited in the grantees workplace and specifying the actions that will be taken against employees for violation of such prohibition, and 2) establish an ongoing, drug-free awareness program to inform employees about the dangers of drug abuse in the workplace; the Agency's and/or subcontractors policy of maintaining a drug-free workplace; any available drug counseling, rehabilitation and employee assistance programs; and the penalties that may be imposed upon employees for drug abuse violations occurring in the workplace.

At a minimum, covered organizations comply with the following:

- Ensure a drug-free workplace and prohibit the manufacture, use, and distribution of controlled substances among their employees.
- Take direct action against an employee convicted of a workplace drug violation. This action may involve imposing a penalty or requiring the offender to participate in an appropriate rehabilitation or counseling program.
- Provide drug-free awareness programs that inform employees of the dangers of workplace substance use; review the requirements of the organization's drug-free workplace policy; and offer information about any available counseling, rehabilitation, or [employee assistance programs \(EAPs\)](#).
- Ensure all employees working on the federal contract understand their personal reporting obligations: notifying the employer within five calendar days if he or she is convicted of a criminal drug violation.
- Notify the federal contracting agency of any covered violation within 10 days.
- Covered organizations maintain an ongoing good faith effort to meet all the requirements of the Drug-free Workplace Act throughout the life of the contract. Covered organizations must demonstrate their intentions and actions toward maintaining a drug-free workplace. Their failure to comply with terms of the Drug-Free Workplace Act may result in a variety of penalties, including suspension or termination of their grants/contracts and being prohibited from applying for future government funding.

### Documentation

- Receipt of Drug-free Workplace Act notification signed by employee in their Human Resources records.
- Documentation and record of employee participation in drug-free awareness programming.

- Written notifications of any violations made known to the organization.

CoC/ESG Interim Rule Citation

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[24 CFR 5.105\(d\)](#), [24 CFR 2424](#), [24 CFR 225](#)

See the HUD Certification for a Drug-Free Workplace Form for more details

E. Equity Analysis

Background

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***To be developed – Phase 2***

Rationale

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Policy Statement

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Procedures

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Documentation

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CoC/ESG Interim Rule Citation

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## F. Financial Management & Subcontractor Policy

### Background

Agencies must establish and maintain standard operating procedures for ensuring that funds are used in accordance with regulations.

The Agency is responsible for ensuring that any terms, conditions, assurances and certifications are carried forward to any subgrants/subcontracts. Agency and its subgrantees/subcontractors agree not to release, divulge, publish, transfer, sell or otherwise make known to unauthorized persons personal information without the express written consent of the funder or as provided by law.

### Rationale

This policy outlines best practices in fiscal management and fulfills Federal and State requirements.

### Policy Statement

Agencies shall demonstrate sound financial practices and policies, including adequate accounting and administrative procedures and controls to safeguard proper use of funds. Additionally, the agencies must have policies and protocols to maintain sufficient records to ensure HUD and the collaborative applicant can determine if funds were used according to the regulation. The records must contain information pertaining to Federal awards, authorizations, obligations, unobligated balances, assets, expenditures, income and interest and be supported by source documentation.

Agency financial policies must include the following:

- Procedures for recording and approving financial transactions
- How records and valuables are securely stored
- How finance tracks cost and ensures they are eligible, including documentation of all costs charged to the grant, funds being spent on allowable costs, the receipt and use of program income, compliance with expenditure limits, and deadlines and match contributions.

Key provisions that should be included in a subcontractor policy are:

- Protocol for monitoring sub-recipients **at least annually**; should include who oversees monitoring, any sanctions or findings from monitoring, and corrective actions the sub-recipient must take.
- Protocol for retaining all solicitations and agreements with sub-recipients, including records for all payment requests and dates payments were made to sub-recipient, and any procurement solicitations or contracts

### Procedures

- If in-kind services are used to fulfill part of the match, the recipient must keep a copy of the Memorandum of Understanding (MOU) executed between the recipient or subrecipient and the third party that will provide the services.
  - The recipient or subrecipient must maintain documentation of the actual in-kind services provided to program participants and in-kind contributions to the project throughout the grant period. The records must evidence how the value placed on third-party in-kind contributions was derived.
  - To the extent feasible, in-kind match represented by volunteer services must be documented using the same methods used by the recipient or subrecipient to support the allocation of regular personnel costs. Services provided by individuals must be valued at rates consistent with those ordinarily paid for similar work in the recipient's or subrecipient's organization.

## Documentation

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- Timesheets that record actual hours worked by the employee and are approved by employee and supervisor
- Evidence to support how the funds are expended. Such documentation must include, to the extent applicable, invoices, schedules containing comparisons of budgeted amounts and actual expenditures, construction progress schedules signed by appropriate parties (e.g., general contractor and/or a project architect), and/or other documentation appropriate to the nature of the activity. Agency records pertaining to obligations, expenditures, and drawdowns must be able to relate financial transactions to either a specific origin year grant or to program income received during a specific program year.
- Financial records, supporting documents, statistical records, and all other records be retained for a period of three years from the date of submission of the final expenditure report or, for Federal awards that are renewed quarterly or annually, from the date of the submission of the quarterly or annual financial report, respectively, as authorized by the Federal awarding agency.
- The recipient must maintain well-documented and accurate project records related to any CoC Program-funded activities conducted by subrecipients or other contractors. At a minimum, the records must include:
  - Copies of all solicitations of and agreements with subrecipients;
  - Records of all payment requests by and dates of payments to subrecipients in compliance with 24 CFR parts 84 and 85;
  - Documentation of subrecipient monitoring, including any monitoring findings, corrective actions required, and sanctions imposed, as applicable; and
  - Copies of all procurement contracts issued by the recipient or subrecipients and documentation of compliance with the procurement requirements in 24 CFR part 85.36 and 24 CFR part 84.

## CoC/ESG Interim Rule Citation

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CoC Interim Rule, § [578.103\(a\)](#) and § [578.103\(a\)](#) (16); this is found on pg. 109 of the formatted version of the CoC Interim Rule

ESG Interim Rule, ESG Interim Rule, § 576.500(u) and § 576.500(v)

## G. HMIS Participation

### Background

The Homeless Management Information System (HMIS) is the central, system-wide platform for collecting information about households who apply for and receive services from prevention, intervention, and housing programs serving at-risk and homeless households and individuals. All agencies funded through local, state and federal funds are required to participate in HMIS.

### Rationale

In addition to fulfilling Federal and State requirements, fully participating in and ensuring accurate data collection in HMIS has many other benefits:

- Improving the coordination of services for people participating in programs.
- Streamlining the fulfillment of documentation requirements (particularly length of time homeless and chronicity) for people participating in programs/seeking to access resources.
- Evaluating program performance and exploring potential unintended disparities in outcomes.
- Evaluating system performance over time and ensuring progress and intentionality of system change efforts.
- Continuum of Care competitiveness for federal funding (regardless of a program's receipt of federal or public funding).

Following the policies and procedures below is critical in ensuring the privacy of confidential information and protecting program participants' privacy and identity.

### Policy Statement

Agencies will comply with all applicable Federal and State confidentiality laws and regulations that protect client records, including the following:

- The Agency will have a signed Memorandum of Understanding (MOU) with King County HMIS and must be compliant with the terms of the MOU; a User Agreement will be signed by each system user prior to a license being issued to that user and the terms of use must be adhered to in order to retain user access and rights.
- The Agency will designate a person responsible for developing and maintaining an internal infrastructure to support and monitor their agency and users' adherence to the Governing Principles and Policies and Procedures of the Countywide HMIS system.
- The Agency will only enter information into the HMIS and/or release confidential client records to authorized agents and representatives and with informed consent in a writing signed by the client, or the client's guardian, unless otherwise provided for in the regulations or laws.
- The Agency will adopt the HMIS Client Grievance Procedures provided by the County or add them as an addendum to its existing client grievance procedures.
- The Agency will adhere to the King County HMIS Standard Operating Policies and Procedures ("SOPs") and adopt an HMIS Privacy Statement as required by the SOPs or add the relevant terms to its existing privacy notice or statement, which describes policies and procedures for safeguarding confidential client information.

### Procedures

Full HMIS Policies and procedures can be found here: <http://kingcounty.hmis.cc/client-forms/>

Documentation

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- Signed Memorandum of Understanding (MOU) with King County HMIS on record.
- Organizational chart identifying designated staff responsible for internal HMIS operations.
- Signed informed consent forms with each program participant.
- Signed receipt of the HMIS Client Grievance Procedures provided by the County for each program participant.

H. Internal Controls

Background

*To Be Developed - Phase 2*

Rationale

Policy Statement

Procedures

Documentation

CoC/ESG Interim Rule Citation

## I. Mandatory Reporting and Preventing Child Sexual Abuse

### Background

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If you are identified as a mandated reporter, you are required by law to report your concerns to the local Children's Administration (CA) office, Child Abuse Hotline or law enforcement. "Mandated reporters" are persons or groups of persons who have frequent contact with children and families and are required by Washington's State law to report suspected cases of child abuse and neglect to CPS or to the appropriate law enforcement agency ([RCW 26.44.030](#)). It is the intent of the law that these designated persons, who are in positions to identify children who are at risk from abuse and neglect, will report suspected child abuse and neglect so that the need for protective services can be assessed.

### Rationale

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Every child has the basic human right to be safe. Child abuse and neglect threaten a child's safety by placing him/her at risk of physical and emotional injuries and even death.

### Policy Statement

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Standards for Making a Report (per Rev. Code [§ 26.44.030](#)):

A report is required when:

- A reporter has reasonable cause to believe that a child has suffered abuse or neglect.
- Any person, in his or her official supervisory capacity with a nonprofit or for-profit organization, has reasonable cause to believe that a child has suffered abuse or neglect caused by a person over whom he or she regularly exercises supervisory authority.
- Department of Corrections personnel observe offenders or the children with whom the offenders are in contact, and because of these observations have reasonable cause to believe that a child has suffered abuse or neglect.
- Any adult has reasonable cause to believe that a child who resides with them has suffered severe abuse.

### CoC/ESG Interim Rule Citation

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[Washington State Law RCW 26.44.030](#)

[Guide for Recognizing and Reporting Child Abuse & Neglect](#)

## J. Non-Discrimination, Reasonable Accommodation & Affirmatively Furthering Fair Housing

### Background

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**Non-Discrimination:** Programs must operate in compliance with federal nondiscrimination and equal opportunity requirements including the Fair Housing Act, Title VI of the Civil Rights Act, the Age Discrimination Act, Section 504 of the Rehabilitation Act, and the Americans with Disabilities Act. Programs may not discriminate based on actual or perceived sexual orientation, gender identity or marital status.

**Reasonable Accommodation:** For persons with disabilities, it is unlawful to: (1) Fail to make reasonable accommodation in rules, policies, and services to give a person with a disability equal opportunity to occupy and enjoy the full use of a housing unit and (2) Fail to allow reasonable modification to the premises if the modification is necessary to allow full use of the premises.

**Affirmatively Furthering Fair Housing:** Programs must implement their programs in a manner that affirmatively furthers fair housing, which means that the program must:

- Affirmatively markets its housing and supportive services to eligible persons – regardless of race, color, national origin, religion, sex, age, familial status, or handicap – who are least likely to apply in the absence of special outreach and maintain records of those marketing activities.
- Where a program encounters a condition or action that impedes fair housing choice for current or prospective program participants, provide such information to the jurisdiction that provided the certification of consistency with the Consolidated Plan.
- Provide program participants with information on rights and remedies available under applicable federal, state, and local fair housing and civil laws.

**Affirmatively Furthering Fair Housing:** “means taking meaningful actions, in addition to combating discrimination, that overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity based on protected characteristics. Specifically, affirmatively furthering fair housing means taking meaningful actions that, taken together, address significant disparities in housing needs and in access to opportunity, replacing segregated living patterns with truly integrated and balanced living patterns, transforming racially and ethnically concentrated areas of poverty into areas of opportunity, and fostering and maintaining compliance with civil rights and fair housing laws. The duty to affirmatively further fair housing extends to all of a program participant’s activities and programs relating to housing and urban development.”

**Meaningful Actions:** “means significant actions that are designed and can be reasonably expected to achieve a material positive change that affirmatively furthers fair housing by, for example, increasing fair housing choice or decreasing disparities in access to opportunity.”

### Rationale

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Furthering Fair Housing protects the rights of protected classes of people and promotes their full access and participation in housing and services.

### Policy Statement

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Agencies must comply with all federal, state, and local nondiscrimination laws, regulations and policies.

**Nondiscrimination**

- The Agency may not, under any program or activity, directly or through contractual or other arrangements, on the grounds of age, sex, marital status, race, creed, religion, color, national origin, sexual orientation, or the presence of any sensory, mental or physical handicap:
  - Deny any person facilities, services, financial aid or other benefits provided under the program or activity.
  - Provide any person with facilities, services, financial aid or other benefits that are different, or are provided in a different form from that provided to others under the program or activity.
  - Subject any person to segregated or separate treatment in any facility or in any matter or process related to receipt of any service or benefit under the program or activity.
  - Restrict in any way access to, or the enjoyment of any advantage or privilege enjoyed by others in connection with facilities, services, financial aid or other benefits under the program or activity.
  - Treat any person differently from others in determining whether the person satisfies any admission, enrollment, eligibility, membership, or other requirement or condition which individuals must meet to be provided any facilities, services or other benefit provided under the program or activity.
  - Deny any person any opportunity to participate in a program or activity as an employee.
- The Agency shall not utilize criteria or methods of administration which have the effect of subjecting individuals to unlawful discrimination on the basis of age, sex, marital status, race, creed, religion, color, national origin, sexual orientation, or the presence of any sensory, mental or physical handicap or which have the effect of defeating or substantially impairing accomplishment of the objectives of the program or activity by unlawfully discriminating against individuals of a particular age, sex, marital status, race, creed, religion, color, national origin, sexual orientation, or the presence of any sensory, mental or physical handicap.
- The Agency, in determining the site or location of housing or facilities provided in whole or in part with funds under this part, may not make selections of such site or location which have the effect of excluding individuals from, denying them the benefits of, or subjecting them to unlawful discrimination on the grounds of age, sex, marital status, race, creed, religion, color, national origin, sexual orientation, or the presence of any sensory, mental or physical handicap.

**Affirmative Outreach and Marketing strategies:**

- CoC and ESG funded programs must develop, implement and document procedures used to market services to eligible persons regardless of race, color, national origin, religion, sex, gender identity, sexual orientation, age, familial status, or disability who are least likely to apply in the absence of special outreach.

**Procedures****Affirmative Outreach and Marketing strategies must:**

- Provide program participants with information on rights and remedies available under applicable federal, state and local fair housing and civil rights laws.
- Comply with the Washington State Law Against Discrimination, RCW 49.60, as it now reads or as it may be amended.
- Ensure meaningful access to persons with limited English proficiency - 1) translate documents advertising assistance, services, and contact information into other languages common in our community, including notices about participant's rights, grievance forms and other documents vital for program access and, 2) work with language services or pool of interpreters to assist persons who speak an alternate primary language other than English and need assistance communicating.
- Make known that use of the facilities, assistance, and services are available to all on a nondiscriminatory

basis.

- Take appropriate steps to ensure effective communication with persons with disabilities including, but not limited to, adopting procedures that will make available to interested persons information concerning the location of assistance, services, and facilities that are accessible to persons with disabilities.
- Take reasonable steps to ensure meaningful access to programs and activities for limited English proficiency (LEP) persons.

#### Documentation

To document compliance with the requirements to affirmatively further fair housing, agencies/programs must maintain copies of marketing, outreach, and other materials used to inform eligible program participants who are least likely to apply, in the absence of special outreach, for the project and maintain records to assess the results of those actions.

Additional documentation includes:

- Signed acknowledgement of receipt of notification of rights for all applicants and participants
- Screening policy statement
- Record of all applicants and outcome determination for all applicants

#### CoC/ESG Interim Rule Citation

#### Regulatory Citations:

[24 § 578.93 \(c\)](#)

[24 § 578.103 \(a\) \(14\)](#)

[24 § 576.407 \(b\)](#)

[24 § 576.500 \(S\) \(1\)](#)

[24 CFR 5.105 \(a\)\(2\)](#)

[CPD Notice-1701](#)

[Executive Order 13166](#)

[HUD's Fair Housing website](#)

[HUD's Affirmatively Furthering Fair Housing website](#)- it contains tools, fact sheets and resources

## K. Participation of Individuals/Households Experiencing Homelessness

### Background

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Per Interim Rule, § 578.75 (g)(1) & § 578.75 (g)(2), agencies must involve households with lived experience in the design, governance and operations of homeless housing organizations and their programs.

### Rationale

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Ensuring participation of people with experiences of homelessness in agency design and service delivery is a critical step in ensuring that services offered have the highest impact while minimizing harm for program participants. Intentionally and meaningfully engaging program participants is a feature of operationalizing racial equity and can equalize the distribution of power.

### Policy Statement

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Agencies must provide for the participation of not less than one homeless individual or formerly homeless individual on the board of directors, or other equivalent policymaking entity of the recipient or subrecipient, to the extent that such entity considers and makes policies and decisions regarding any project, supportive services, or the provision of CoC Program assistance. In addition, agencies must, to the extent possible, involve households with lived experience through employment, volunteering, operating the project and/or providing supportive services.

### Procedures

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Agencies will:

- Have processes in place to integrate people who have experienced homelessness into program operations (employment, operations, volunteerism, etc.)
- Keep an accurate board roster to identify how many members have experienced homelessness.
- Establish recruitment methods used to re-fill a vacant position or add new positions to their Board for people who have experienced homelessness

Seek input from current and/or former clients in areas of program planning, program development, policy development and program evaluation, including exit and/or post exit interviews or surveys, focus groups, and/or client meetings

### Documentation

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Agencies must document compliance with the homeless participation requirements in 24 CFR part 578.75(g).

### CoC/ESG Interim Rule Citation

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CoC Interim Rule, § 578.75 (g)(1) & § 578.75 (g)(2); found on page 93 of the formatted version of the [CoC Rule](#)

ESG Interim Rule, § [576.405](#); applies only to direct recipients of ESG funding (not sub-recipients), unless a recipient has required it for its sub-recipients

## L. Procurement

### Background

Per CoC Interim Rule, § 578.95(a), agency procurement transactions must be conducted in a manner to provide, to the maximum extent practical, open and free competition.

### Rationale

Procurement policies reinforce best practices in fiscal management and fulfills Federal and State requirements.

### Policy Statement

- Agencies must have a code of conduct which includes the following provisions:
  - No employee, officer, or agent shall participate in the selection, award, or administration of a contract supported by federal funds if a real or apparent conflict of interest would be involved. Such a conflict would arise when the employee, officer, or agent, any member of his or her immediate family, his or her partner, or an organization which employs or is about to employ any of the parties indicated herein, has a financial or other interest in the firm selected for an award.
  - The officers, employees, and agents of the organization shall neither solicit nor accept gratuities, favors, or anything of monetary value from contractors, or parties to sub agreements. However, Programs may set standards for situations in which the financial interest is not substantial, or the gift is an unsolicited item of nominal value.
  - The standards of conduct shall provide for disciplinary actions to be applied for violations of such standards by officers, employees, or agents of the Program.
- Procurement transactions must be conducted in a manner to provide, to the maximum extent practical, open and free competition.
- Agencies must have procurement policies in place regarding the following types of procurements: Small purchase procedures are used for procurements under \$25,000 and are relatively simple and informal procurement methods.
- Sound business practices are required for small purchases, which is met by obtaining price or rate quotations from at least three (3) qualified sources.
- Procurements more than the small purchase threshold must be conducted using a solicitation process. Procurement records and files for purchases more than the small purchase threshold shall include the following at a minimum: basis for contractor selection; justification for lack of competition when competitive bids or offers are not obtained; and basis for award cost or price.

### CoC/ESG Interim Rule Citation

CoC Interim Rule, § 578.95(a); this citation is found on page 105 of the formatted version of the [CoC Interim Rule](#)

ESG Interim Rule, § [576.202](#)

## M. Records Retention & Public Access to Records

### Background

It is the CoC's policy to prohibit the knowing destruction, alteration, mutilation, or concealment of any record, document, or tangible object with the intent to obstruct or influence the investigation or proper administration of any matter within the jurisdiction of any local, state, or federal department or agency.

The program must establish and maintain standard operating procedures for ensuring that the CoC program funds are used in accordance with the requirements of the CoC Program interim rule and must establish and maintain sufficient records to enable HUD to determine whether the recipient and its subrecipients are meeting the requirements, such as those related to conflicts of interest, involvement of persons who are homeless, faith-based activities, affirmatively furthering fair housing, and other federal regulations.

### Rationale

Standard record-keeping and retention policies are required for local, state and federal funds.

### Policy Statement

Agencies with Federal or State funds (CoC, ESG, CDBG, and CHG) must follow the policies below. Agencies not receiving Federal or State funds will refer to the requirements of their individual contracts for further guidance. Any agencies with Capital funding will need to refer to any additional requirements outlined in Capital contracts.

For each CoC Program, ESG, CDBG, and CHG grant, recipients and subrecipients must maintain separate records to document that the project is in compliance with the service provision, match, and housing quality standards (HQS) requirements in the CoC Program interim rule. The recipient must also maintain well-documented and accurate project records related to subrecipient or other contractor activities.

All records containing information related to CoC Program funds and activities must be retained and kept accessible for either 5 years or the period specified below, whichever is longer. Copies of records may be substituted for original records.

- Program participants' qualifications, eligibility documentation, and other program participant records must be retained for 5 years after expenditure of all funds from grant under which program participants were served.
- Records for acquisition, new construction, and rehabilitation must be retained for 15 years following the date the project is first occupied, or used, by program participants. Only those records related to the acquisition, rehabilitation, or new construction must be retained for 15 years. All other records must be retained for the period specified above.

### Access to records:

- (1) Federal Government rights: Notwithstanding confidentiality procedures, HUD, the HUD Office of the Inspector General, and the Comptroller General of the United States, or any of their authorized representatives, must have the right of access to all books, documents, papers, or other records of the program that are pertinent to the Continuum of Care grant, to make audits, examinations, excerpts, and transcripts. These rights of access are not limited to the required retention period, but last as long as the records are retained.

## SEATTLE/KING COUNTY CONTINUUM OF CARE COMMUNITY STANDARDS

- (2) Public rights. Agencies must provide citizens, public agencies, and other interested parties with reasonable access to records regarding any uses of funds the recipient received during the preceding 5 years, consistent with State and local laws regarding privacy and obligations of confidentiality and confidentiality requirements in this part.

### Other specific requirements:

- Services Provided: Recipients or subrecipients must document the types of supportive services provided to individuals and families and the amounts spent on those services. They must also document that such information undergoes review at least annually and that the service package offered to program participants was adjusted accordingly.
- Housing Quality Standards: Recipients or subrecipients must retain documentation to demonstrate compliance with the housing standards at 24 CFR part 578.75(b). These standards require the recipient or subrecipient to inspect housing units leased with CoC Program funds and units for which rental assistance payments are made with CoC Program funds to ensure the assisted units meet the applicable housing standards.
- Match: The recipient must keep records of the source and use of cash and in-kind contributions used to satisfy the 25 percent match requirement as described at 24 CFR part 578.73. Match records must indicate the grant and fiscal year for which each matching contribution is counted. If the subrecipient is responsible for some or all the match commitment, the recipient should collect appropriate documentation from the subrecipient to comply with the match recordkeeping requirements.

### Procedures

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- Agencies shall maintain all records of:
  - Operating policies and procedures;
  - Employee qualifications, training, and evaluation;
  - Principal operations data: work units completed; clients served, classified by client and service characteristics; staff hours utilized; etc.
- Each participant file should contain, at minimum, information required by funders, participation agreements and/or signed lease agreements, service plans, case notes, information on services provided both directly and through referral, and any follow-up and evaluation data that are compiled.
- The program will maintain each participant file in a secure place and shall not disclose information from the file without the written permission of the participant as appropriate except to project staff and other agencies as required by law. Participants must give informed consent prior to release of any participant identifying data to be utilized for research, teaching and public interpretation.
- The records and documents with respect to all matters covered by this Agreement shall be subject at all times to inspection, review or audit by the City or State officials (State Auditor) as authorized by law during the term of this Agreement and during the period of retention specified in Section 3 of this Part.

### CoC/ESG Interim Rule Citation

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CoC Interim Rule, § 578.103 (c) and (d); This citation is found on page 113 of the formatted version of the [CoC Interim Rule](#); ESG Interim Rule, § 576.500(y) and § 576.500(z)

N. Sexual Harassment

Background

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*To Be Developed - Phase 2*

Rationale

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Policy Statement

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Procedures

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Documentation

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CoC/ESG Interim Rule Citation

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O. Whistleblower Policy

Background

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*To Be Developed - Phase 2*

Rationale

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Policy Statement

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Procedures

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Documentation

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CoC/ESG Interim Rule Citation

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## IV. Program-Level Policies & Procedures

The following program-level policies and procedures provide specific guidance for programs across the housing continuum. These policies create consistency across King County agencies and protect clients. In addition to the system-level standards and agency policies outlined above, the following guidelines apply to all programs within the CoC.

### A. Client Choice

#### Background

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Homeless service and housing agencies in the CoC shall demonstrate that services are client-centered and strength-based and shall use individualized service planning to coordinate housing-focused supportive services. An empowerment model of services also gives voice to people who have not had the opportunity to use their voice or choice to control aspects of their lives – particularly critical for communities of color, other marginalized groups (persons identifying as LGBTQ and people living with disabilities, for example), and survivors of domestic violence.

#### Rationale

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Participant choice is a fundamental part of an effective Housing First approach, which ensuring that:

- Efforts are made to maximize client choice, including type, frequency, timing, location and intensity of services and whenever possible choice of neighborhoods/apartments.
- Staff accepts tenant choices as a matter of fact without judgment and provides services that are non-coercive to help people achieve their personal goals.
- Staff accepts that risk is part of the human experience and helps tenants to understand risks and reduce harm caused to themselves and others by risky behavior.
- Staff understands the clinical and legal limits to client 'choice,' and intervenes as necessary when someone presents a danger to self or others.
- Staff helps tenants to understand the legal obligations of tenancy and to reduce risk of eviction.
- Programs provide meaningful opportunities for tenant input and involvement when designing programs, planning activities and determining policies.

#### Policy Statement

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- Participants are given regular opportunities in decision-making for programs and services, such as participation on an agency board, a tenant board, or a consumer input panel.
- Participant feedback on programs and services is solicited at least annually.
- Program staff do not engage in coercive strategies to promote or limit housing or service options and aim to fully inform participants of all possibilities. (For example, program staff do not advise clients on a particular referral resource, housing option, etc. and instead work with participants to explore their own interests, expertise and motivation for a particular option.)

B. Client Records/Case Notes

Background

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***To Be Developed – Phase 2***

Rationale

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Policy Statement

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Procedures

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Documentation

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CoC/ESG Interim Rule Citation

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### C. Confidentiality

#### Background

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In addition to privacy and security policies related to HMIS (see HMIS Policies), maintaining strict confidentiality of protected identifying information of participants receiving CoC assistance is a [Federal requirement](#).

#### Rationale

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Maintaining confidentiality and protecting the rights of participants is a critical responsibility of professionals working with people receiving services. This policy fulfills Federal and State confidentiality and privacy requirements.

#### Policy Statement

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In addition to meeting the specific confidentiality and security requirements for HMIS data, programs must ensure that all records containing protected identifying information of any individual or family who applies for and/or receives Continuum of Care assistance is kept secure and confidential; the address or location of any family violence project assisted with Continuum of Care funds will not be made public, except with written authorization of the person responsible for the operation of the project; and the address or location of any housing of a program participant will not be made public, except as provided under a preexisting privacy policy of the Continuum of Care or program and consistent with State and local laws regarding privacy and obligations of confidentiality.

When appropriate, programs should obtain legal counsel regarding the confidentiality of records and the general conditions under which they may be subpoenaed. Additional legal counsel is sought, if necessary, when courts, public officials, investigative units, or law enforcement bodies seek special or unusual information about a client.

Additionally, programs will:

- Obtain informed consent to share personal identifying information with relevant parties for all program participants when referrals or information sharing is needed.
- Establish agency protocol for when staff are permitted or prohibited from sharing personal identifying information
- Establish protocols for storing or protecting paper records within the building
- Establish protocols for protecting electronic records containing protected identifying information
  - Examples may include protocol for logging off computers, setting computer timers to automatically log off after a period of inactivity, and policies for password protection and encryption of documents
- Comply with mandatory reporting laws and protect clients and the community when a client may be dangerous to self or others. To this end, programs must establish and follow written policies regarding disclosure of sensitive information about the client. Internal policies and procedures are developed for recording and periodically reviewing these cases to determine that appropriate disclosure takes place.
- In the absence of a subpoena or other legal requirement, programs and program staff will not provide information about clients to law enforcement or other outside entities without written consent of the client.

## SEATTLE/KING COUNTY CONTINUUM OF CARE COMMUNITY STANDARDS

### Documentation

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- Signed consents for all program participants for all referrals or contacts made outside a participating agency
- When programs receive a valid request for the release of confidential information, programs must obtain the informed, written consent of the client as required by law. Programs shall provide a copy of the signed consent to the person giving consent and place a copy in the case record. Documentation of a client's consent should include the following elements as well as any other elements that may be required by applicable law:
  - the signature of the person whose information will be released, or the legal guardian of a client who is not able to provide such informed consent;
  - the specific information to be released;
  - the purpose for which the information is sought;
  - the date the consent takes place;
  - the date the consent expires;
  - the identity of the person to whom the information is to be given;
  - the identity of the person within the organization who is releasing the confidential information; and
  - a statement that the person or family served may withdraw their consent at any time.

### CoC/ESG Interim Rule Citation

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CoC Interim Rule, § 578.103(b); this citation is found on page 109 of the formatted version of the [CoC Interim Rule](#); ESG Interim Rule, § 576.500(x)

### D. Education Services

#### Background

The McKinney-Vento Education of Homeless Children and Youth Assistance Act is a federal law that ensures immediate enrollment and educational stability for homeless children and youth. McKinney-Vento provides federal funding to states for the purpose of supporting district programs that serve homeless students.

The McKinney-Vento Act also requires that:

- Homeless students who move have the right to remain in their school of origin if that is in the student's best interest
- If it is in the student's best interest to change schools, homeless students must be immediately enrolled in a new school, even if they do not have the records normally required for enrollment
- Transportation must be provided to or from a student's school or origin, at the request of a parent, guardian, or, in the case of an unaccompanied youth, the local liaison
- Homeless students must have access to all programs and services for which they are eligible, including special education services, preschool, school nutrition programs, language assistance for English learners, career and technical education, gifted and talented programs, magnet schools, charter schools, summer learning, online learning, and before and after-school care
- Unaccompanied youth must be accorded specific protections, including immediate enrollment in school without proof of guardianship
- Parents, guardians, and unaccompanied youth have the right to dispute an eligibility, school selection, or enrollment decision<sup>1</sup>

#### Rationale

This policy fulfills Federal and State regulations and promotes the access of education services for children and youth regarding their housing status.

#### Policy Statement

When applicable, programs must take the educational needs of children into account when families are placed in housing and will, to the maximum extent practicable, place families with children as close as possible to their school of origin so as not to disrupt such children's education.

Programs serving families with children and school-aged youth and young adults must:

- Inform families and youth experiencing homelessness of their eligibility for McKinney Vento education services during the intake process
- Not require children enroll in new schools as a condition of entry
- Not establish program requirements that prohibit children from remaining in their school of origin
- Develop relationships with colleges to access Higher Education Services specifically for homeless youth ([Higher Education Act](#))
- Designate a staff person to ensure that children are enrolled in school and connected to services in the community including programs such as:

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<sup>1</sup> Education of Homeless Children and Youth: WA State Office of Superintendent of Public Instruction.  
<http://www.k12.wa.us/HomelessEd/default.aspx>

## SEATTLE/KING COUNTY CONTINUUM OF CARE COMMUNITY STANDARDS

- Head Start
- Part C of the Individuals with [Disabilities Education Act](#)
- [McKinney-Vento education services](#)

### Procedures

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Program procedures should incorporate the following:

- Intake processes include an assessment of current school enrollment/attendance status
- Families receive McKinney Vento and Higher Education Act information upon program entry
- Program staff coordinate with McKinney Vento liaisons to ensure continuity of school attendance (or, in cases when there has been a disruption in attendance, to support students to return to school as quickly as possible)

### Documentation

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- Intake forms include information regarding any current school enrollment(s)
- Job descriptions include responsibilities related to support school enrollment for applicable staff
- Client files have records of signed verification of receipt of McKinney-Vento Act eligibility

### CoC/ESG Interim Rule Citation

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CoC Interim Rule, § 578.23 (c)(4); this citation is found on page 66 of the formatted version of the [CoC Interim Rule](#); ESG Interim Rule, § 576.400(b)(5)

[McKinney-Vento Homeless Assistance Act \(PL100-77\)](#)

## E. Equal Access Rule

### Background

CoC and ESG funded programs must implement and document procedures to ensure implementation of the Equal Access Rule. All clients shall be informed of their right to access housing and services without discrimination, and of their right to initiate a grievance process if they believe they have been discriminated against.

### Rationale

All services coordinated through the Continuum of Care must be available to all eligible persons, regardless of race, color, national origin, religion, sex, age, familial status, disability, actual or perceived sexual orientation, gender identity, marital status, height, or weight. The CoC and its partners will take all necessary steps to ensure that housing and services are administered in accordance with all applicable Federal and State civil rights laws.

### Policy Statement

#### **Admissions & Occupancy**

The admissions, occupancy, and operating policies and procedures of programs, including policies and procedures to protect privacy, health, safety, and security, shall be established or amended, as necessary, and administered in a nondiscriminatory manner to ensure that:

- (1) Equal access to HUD CoC, ESG (and all other HUD Community Planning & Development- CPD) programs, shelters, other buildings and facilities, benefits, services, and accommodations is provided to an individual in accordance with the individual's gender identity, and in a manner that affords equal access to the individual's family;
- (2) An individual is placed, served, and accommodated in accordance with the gender identity of the individual;
- (3) An individual is not subjected to intrusive questioning or asked to provide anatomical information or documentary, physical, or medical evidence of the individual's gender identity; and
- (4) Eligibility determinations are made, and assisted housing is made available in HUD CoC (and all CPD) programs as required by non-discrimination policies.

#### **Placement in Shared or Temporary Accommodations**

Placement and accommodation in temporary, emergency shelters and other buildings and facilities with shared sleeping quarters or shared bathing facilities must ensure that:

- Placement and accommodation of an individual in temporary, emergency shelters and other buildings and facilities with physical limitations or configurations that require and are permitted to have shared sleeping quarters or shared bathing facilities shall be made in accordance with the individual's gender identity.
- A program must take nondiscriminatory steps that may be necessary and appropriate to address privacy concerns raised by residents or occupants and, as needed, update its admissions, occupancy, and operating policies and procedures.

### Procedures

Programs must have written procedures to ensure equal access to shelter, housing and services regardless of actual or perceived sexual orientation, gender identity, or marital status, and that:

- Ensure placement and accommodation are made in accordance with an individual's gender identity.
- Ensure the agency uses appropriate, inclusive language in communications, publications, trainings, personnel handbooks and other policy documents that affirms the agency's commitment to serving all eligible clients in adherence with the Equal Access Rule (for example, when projects serve ANY families with children, they must serve ALL families with children; that includes families of any composition type: single dad, single mom, same-

## SEATTLE/KING COUNTY CONTINUUM OF CARE COMMUNITY STANDARDS

sex couples, opposite-sex couples, multi-generational, and non-romantic groups who present for services as a family).

- Include an anti-harassment policy that includes transgender and non-gender conforming in the list of groups vulnerable to harassment and/or list of protected groups.
- Have a formal grievance process that is prompt, transparent and consistent in managing and resolving violations.
- Include confidentiality practices that keep a client's transgender status confidential, unless the client gives permission to share this information.
- Allows for clients to request a private space for intake and data collection.
- Outlines safety practices including respecting the client's evaluation of their own safety practice regarding proposed housing options and accommodating reasonable clients request regarding safety.
- If bathroom or shower facilities are single-sex, transgender clients should have access to bathroom and shower facilities based on their gender of identification. People who identify outside of the male/female gender binary should have access to whichever bathroom and shower facilities help them feel safest.
- Programs must provide notice and training to all program staff to ensure compliance with written policies regarding equal access and client intake.

### Documentation

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Programs shall document and maintain records of compliance with the requirements of this policy and retain documentation for a period of 5 years.

- Signed acknowledgement of receipt of non-discriminatory practices, grievance policy, and participant rights to request reasonable accommodations by the applicant/participant
- Grievances submitted, and organizational action taken
- Requests for reasonable accommodations and organizational action taken
- Providers shall document and maintain records of compliance with these requirements for a period of 5 years

Get a notice of rights at: <https://www.hudexchange.info/resources/documents/Notice-on-Equal-Access-Rights.pdf>

### CoC/ESG Interim Rule Citation

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[24 CFR Part 5, § 5.100- § 5.106](#)- The rule begins on page 20 of the Equal Access Rule document

F. Equity Analysis

Background

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***To Be Developed – Phase 2***

Rationale

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Policy Statement

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Procedures

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Documentation

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## G. Grievance Policy

### Background

It is the policy of the Seattle/King County CoC to provide clients with a fair and efficient process to present and resolve complaints and grievances. Each program shall have a grievance policy and shall implement their written standards for addressing grievances when applicable.

### Rationale

Filing a grievance or complaint regarding a program, staff or service delivery is a right of all program participants. Programs have a responsibility to respond to these complaints in a fair and efficient process. Addressing grievances provide another way to improve upon program delivery and further gives voice and power to program participants.

### Policy Statement

Programs/program staff must:

- Inform participants of their rights to file grievances upon program entry
- Accept (and treat equally) formal grievances in writing or provided orally by the participant
- Comply with a participant's request to file a grievance once requested (if other attempts to mediate the situation hasn't resolved the participant's concerns)
- Direct participants to the appropriate program staff or supervisor not involved in the grievance
- Provide an opportunity for a participant to review decisions
- Not retaliate against the participant during or after the grievance

### Procedures

Programs must have an internal grievance process that includes:

- Detailed client grievance procedures, which include how participants will be informed of their rights to resolve grievances, the contact information for the person designated to receive a grievance or complaint, and a timeline for the agency to respond to an appeal or grievance and must post them in a place conspicuous and accessible to clients. In addition, each client shall receive a copy of the grievance policies and procedures, upon intake and upon receiving a warning or discharge notice, in all appropriate languages or in a fashion readily accessible to accommodate non-hearing and sight impaired individuals.
- A clear description of how households can request a review or report concerns.
- A process to reinstate services following an appeal that rules against them and in favor of the client without having to do a new assessment.
- A grievance process that focuses on preventing the escalation of conflicts, resolving conflicts, and improving program environments for clients and staff. To this end, programs must strive to maximize the use of informal avenues for resolving disputes whenever possible.
- A process to allow clients the opportunity to be represented by a third-party advocate in the grievance process. Reasonable efforts must be made to coordinate with the client's advocate to schedule the appeal.
- To the extent possible, the goal of grievance procedures should be conflict resolution, rather than determining or assigning fault or blame.

### Documentation

## SEATTLE/KING COUNTY CONTINUUM OF CARE COMMUNITY STANDARDS

- Documentation of all grievances filed against the program including, but not limited to, name of the person filing the grievance, date the grievance is filed, nature of the grievance, outcome of the grievance and the date of resolution.

## H. HMIS Participation

### Background

The Homeless Management Information System (HMIS) is the central, system-wide platform for collecting information about households who apply for and receive services from prevention, intervention and housing programs serving at-risk and homeless households.

### Rationale

The purpose of HMIS is to improve services that support people who are homeless to get housing, and to have better access to those services, while meeting requirements of funders, such as the U.S. Department of Housing and Urban Development (HUD). All programs are required to enter data in to HMIS per the CoC HMIS guidelines.

### Policy Statement

Programs shall:

- Actively participate in HMIS and follow the policies and procedures in the [HMIS Standard Operating Procedures](#).
- Ensure that any new program is set-up in the HMIS in a timely manner. Additionally, programs will notify HMIS when a program is closed or ended.
- Obtain client consent before submitting personally identifying information according to procedures outlined in the HMIS SOP and in compliance with state law. The Informed Consent and Release of Information Form is available on the HMIS website at [www.kingcounty.hmis.cc](http://www.kingcounty.hmis.cc). The Program must enter all required data according to the client's consent status, and as outlined in the HMIS Standard Operating Procedures.
  - Clients may not be refused services based solely on their refusal to provide personally identifying information for the HMIS. This is not meant to prevent agencies from collecting information required for eligibility screening or other internal Agency requirements.
- Protect the safety of survivors of domestic violence and sexual assault, by not entering personally identifying information (i.e. name, date of birth, last known permanent address or other contact information, or social security number) into HMIS. Furthermore, potentially identifying demographic information (i.e. information that could be used to identify a person in combination with other non-personally identifying information) may be excluded from entry into HMIS. The Program should follow HMIS Consent Refused Data Entry procedures regarding these situations. Victim service providers are required to enter basic information about the organization/program (Program Descriptor Data), not including street address, into HMIS.
- Not enter confidential information regarding HIV/AIDS status, in accordance with RCW 70.02.220. If funding (i.e. HOPWA) requires HMIS use, those clients' data shall be entered without Identifying Information.

### Procedures

See HMIS Policies: <http://kingcounty.hmis.cc/client-forms/>

### Documentation

- Active participation in HMIS will be evidenced by the program entering a complete data set for all clients served. This includes universal, program specific and local continuum data elements for required report completion as outlined in the HMIS Data Standards Manual. Universal and program specific data elements are defined by the Department of Housing and Urban Development (HUD) in the HMIS Data Standards. Programs

## SEATTLE/KING COUNTY CONTINUUM OF CARE COMMUNITY STANDARDS

approved for the Minimum Program Intake/Exit process shall submit the approved sub-set of the data elements. This complete data set will be entered within the timeframe established in the HMIS Standard Operating Procedures available on the HMIS website at [www.kingcounty.hmis.cc](http://www.kingcounty.hmis.cc).

- Signed client consent forms for all participants.

## I. Housing First

### Background

Housing first is an approach designed to return people experiencing homelessness to housing as quickly as possible. It is an approach that can be employed regardless of the homeless housing and services intervention (from outreach services, emergency shelter, transitional housing, and so on). Program acceptance is provided without a “housing readiness” test, or other conditions. Programs in a housing first homeless system empower people to overcome barriers to obtaining permanent housing. Support services are voluntary for the program participant but not for the service provider and can and should be used to persistently engage tenants. A housing first system does not require that households spend time in a shelter or graduate from a transitional housing program to attain housing. To achieve a housing first system orientation, homeless housing programs must reduce screening barriers and screen in homeless households, many of whom may have barriers that traditionally make it more difficult for them to access needed resources and housing. Utilizing a Housing First orientation is a core value of the Continuum of Care for the following reasons:

- Low barrier access to resources ensures the most vulnerable have access to needed and relevant services.
- Low barrier access to housing affirms Fair Housing and reduces barriers for people of color and people living with disabilities who are disproportionately impacted by discriminatory screening practices (for example, people of color are disproportionately impacted by discriminatory practices that lead to higher rates of criminal backgrounds which further limits access to housing).
- The coordination of access to resources ensures resources are fully utilized and improves the efficiency and effectiveness of targeting limited resources to the most vulnerable households.
- Reducing barriers to maintaining housing and ensuring services are coordinated ensures people will be less likely to return to homelessness if a program is not a good fit for their needs or priorities.

### Policy Statement

Programs providing shelter, housing and services to people experiencing homelessness will employ a Housing First approach to their program model. Programs will adopt the following housing first policies:

- Admission/tenant screening and selection practices which are appropriate for the program model, target population, and services provided, and promote acceptance of applicants regardless of their sobriety, use of substances, criminal history, completion of treatment, or participation in services.
- Applicants are not rejected due to lack of credit or income, lack of rental history, minor criminal convictions<sup>2</sup>, or other factors that might indicate a lack of “housing readiness.”
- Only those admission criteria that are required by funders are applied. Application of such additional criteria should be rare and must be approved by funders. See CEA and Screening/Intake Policies for additional information.
- Screening and intake documentation prior to program acceptance is limited to funding requirements and program staff assist referred clients/applicants in acquiring needed documentation to limit the burden clients/applicants.

<sup>2</sup> Housing programs operating in the City of Seattle must follow the requirements listed under the [Fair Chance Ordinance](#).  
All Home Seattle/King County Continuum of Care Interim Policies

## SEATTLE/KING COUNTY CONTINUUM OF CARE COMMUNITY STANDARDS

- The project accepts participants into the project regardless of past non-violent rule infractions within the agency's own program and/or in other previous housing. Permanent 'barring' of a household is only permitted in the rare exceptions (production of meth in public housing, sex offense or arson).
- Programs reduce barriers for participants to remain in housing and services, including the service participation requirements, programmatic rules that have a disparate impact on people living with disabilities, and provide accommodations ensuring full participation of services available can be utilized. The project allows participants to remain in the project if they require an absence of less than 90 days due to the reasons outlined below, unless otherwise prohibited by law or funder policy:
  - Substance use treatment intervention
  - Mental health treatment intervention
  - Hospitalization and short-term rehabilitation
  - Incarceration
  - Other service- related reason approved by an agency supervisor

### Documentation

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- Signed acknowledgement of receipt of screening policies for all applicants
- Signed acknowledgement of receipt of participant rights and responsibilities (which include notes about the program's orientation to service participation) for all participants

## SEATTLE/KING COUNTY CONTINUUM OF CARE COMMUNITY STANDARDS

### J. Insurance Requirements

Background

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***To Be Developed – Phase 2***

Rationale

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Policy Statement

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Procedures

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Documentation

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## SEATTLE/KING COUNTY CONTINUUM OF CARE COMMUNITY STANDARDS

### K. Language Access

#### Background

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***To Be Developed – Phase 2***

#### Rationale

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#### Policy Statement

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#### Procedures

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#### Documentation

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### L. Lead Paint Requirements

#### Background

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To prevent lead poisoning in young children, subgrantees must comply with the Lead-Based Paint Poisoning Prevention Act of 1973 and its applicable regulations found at 24 CFR 35, Parts A, B, M, and R.

#### Rationale

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This policy aligns with Federal requirements and prevents potential lead poisoning in young children.

#### Policy Statement

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A visual assessment must be conducted prior to move-in and on an annual basis thereafter (if assistance is provided) for any housing or unit constructed prior to 1978. Visual assessments must be conducted by a HUD-Certified Visual Assessor and must be documented on the HQS or HHS and maintained in the client file.

Visual assessments are not required under the following circumstances:

- If the housing unit is not occupied by a child(ren) under the age of six or a pregnant woman;
- Zero-bedroom or SRO-sized units;
- X-ray or laboratory testing of all painted surfaces by certified personnel has been conducted in accordance with HUD regulations and the unit is officially certified to not contain lead-based paint;
- The property has had all lead-based paint identified and removed in accordance with HUD regulations;
- The unit has already undergone a visual assessment within the past 12 months – obtained documentation that a visual assessment has been conducted; or
- It meets any of the other exemptions described in 24 CFR Part 35.115(a).

If any of the circumstances outlined above are met, subgrantees must include the information in the client file.

All households with children must be provided a notification of the Lead Paint requirements outlined in this policy (see below).

#### Documentation

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Lead Based Paint Notification can be found [here](#).

The Lead Safe Housing Rule as well as a HUD training module to help recipients of funds effectively implement the requirements of the Lead Safe Housing Rule in their programs can be accessed at [http://portal.hud.gov/hudportal/HUD?src=/program\\_offices/healthy\\_homes/enforcement/lshr](http://portal.hud.gov/hudportal/HUD?src=/program_offices/healthy_homes/enforcement/lshr)

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

Anyone may become a HUD-Certified Visual Assessor by successfully completing a 20-minute online training on HUD's website at:

<http://www.hud.gov/offices/lead/training/visualassessment/h00101.htm>

## M. Lease Requirements (draft)

### Background

The majority of Transitional Housing programs will require a lease for participants and will need to comply with the lease requirements noted in this policy. Programs will need to be familiar with all operating and service and capital funding requirements. Programs providing permanent housing will need to comply with the lease requirements noted in this policy.

### Rationale

This Lease Requirement Policy aligns with Federal and State requirements and serves to protect the housing rights of program participants. It also aligns with a Housing First orientation in that lease requirements are limited to reasonable tenancy requirement as opposed to any other arbitrary requirements which would otherwise create barriers to maintaining housing.

### Policy Statement

- Programs funded as transitional housing or permanent housing under the CoC Program must have in place leases or program participation agreements for the term of one year.
- Programs funded by ESG can implement month to month leases.
- Programs must also comply with any additional lease term requirements as outlined by their Capital investments and if receiving or operating under Section 8 project-based, tenant-based, or public housing policies.

### Additional Requirements for Transitional Housing

*To be developed*

### Additional Requirements for Permanent Housing for People Experiencing Homelessness

*To be developed*

***Lease compliance and housing retention*** - Tenants are expected to comply with a standard lease agreement and are provided with services and supports to help maintain housing and prevent eviction. Visitors are expected to comply with requirements in the lease agreement.

***Housing Retention***- Retention in housing is contingent only on lease compliance and is not contingent on abstinence from substances or compliance with services, treatment or other clinical requirements. For example:

- Tenants are not terminated involuntarily from housing for refusal to participate in services or for violating program rules that are not stipulated in the lease.
- Transitional housing programs offer participants due process to resolve issues that may result in involuntary discharge (unless immediate risk to health and safety)
- Permanent housing providers only terminate occupancy of housing in cases of noncompliance with the lease.
- To terminate housing, permanent housing providers are required to use the legal court eviction process.

***Separation of housing and services*** Projects are designed in such a manner that the roles of property management (e.g., housing application, rent collection, repairs, and eviction) and supportive services staff are clearly defined and distinct.

- Property management and support service functions are provided either by separate legal entities or by staff members whose roles do not overlap.

## SEATTLE/KING COUNTY CONTINUUM OF CARE COMMUNITY STANDARDS

- There are defined processes for communication and coordination across the two functions to support stable tenancy.
- Those processes are designed to protect client confidentiality and share confidential information on a need to know basis only.

Additionally,

- Leases do not include stipulations beyond those that are customary, legal, and enforceable under state/local law.
- No program rules beyond those that are customary, legal, and enforceable through a lease are applied (e.g., visitor policies should be equivalent to those in other types of permanent, lease-based housing in the community). Housing providers may ask for identification from visitors.
- At a minimum, the lease or rent agreement must be between the household and the landlord and must contain the following:
  - Name of tenant
  - Name of landlord
  - Address of rental property
  - Occupancy (who gets to live at the rental)
  - Term of agreement (lease start and end date)
  - Rent rate and date due
  - Deposits (if any and what for/term)
  - Signature of tenant/date ☐ Signature of landlord/date
  - Services are designed to identify and reduce risks to stable tenancy and to overall health and well-being.

### Procedures

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Designated staff will review program lease with an applicant prior to program entry, and again, shortly after program enrollment.

### Documentation

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All applicable programs will include a signed copy of the participant's lease in the participant's file.

N.     Occupancy Standards

Background

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*To Be Developed – Phase 2*

Rationale

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Policy Statement

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Procedures

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Documentation

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CoC/ESG Interim Rule Citation

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## O. Participation in Coordinated Entry

### Background

The purpose of Coordinated Entry for All (CEA) is to ensure that all people experiencing homelessness have fair and equal access to housing, regardless of race, color, national origin, religion, sex, age, familial status, disability, actual or perceived sexual orientation, gender identify, or marital status. The system aims to work with households to understand their strengths and needs, provide a common assessment, and connect them with housing and homeless assistance. Using standardized tools and practices, CEA aims to incorporate the principles of a system-wide housing first approach and prioritize those with the highest service needs.

### Rationale

Coordinated Entry for All is designed to:

- Allow anyone who needs assistance for a housing crisis to know where to go to access assistance and to be assessed in a standard and consistent way;
- Ensure that households who are experiencing homelessness gain access as efficiently and effectively as possible to available community interventions;
- Prioritize households for limited housing resources based on need and vulnerability;
- Provide clarity, transparency, consistency, and accountability throughout the, assessment and referral process for households experiencing homelessness, community partners, and homeless and housing service providers; and
- Facilitate exits from homelessness to stable housing in the most rapid manner possible.

### Policy Statement

The following HUD definitions are used at CEA for program eligibility.

**Category 1, Literally Homeless:** Individual or family who lacks a fixed, regular, and adequate nighttime residence, meaning:

- a. Has a primary nighttime residence that is a public or private place not meant for human habitation;
- b. Is living in a publicly or privately-operated shelter designated to provide temporary living arrangements (including congregate shelters, transitional housing, and hotels and motels paid for by charitable organizations or by federal, state and local government programs); or
- c. Is exiting an institution where (s)he has resided for 90 days or less and who resided in an emergency shelter or place not meant for human habitation immediately before entering that institution.

**Category 4, Fleeing or Attempting to Flee a Domestic Violence Situation:** Any individual or family who:

- a. Is fleeing, or is attempting to flee, domestic violence, sexual assault, stalking, or other dangerous or life-threatening conditions (survival sex, human trafficking);
- b. Has no other residence; and
- c. Lacks the resources or support networks to obtain other permanent housing.

**Young adults who are imminently at risk of homelessness** within 14 days are also eligible for CEA.

Additionally, programs shall:

- Work with the CEA Coordinating Entity and follow the policies and procedures in the CEA Operations Manual, including but not limited to posting open units and responding to referrals.
- Ensure that any new program is set-up in the HMIS and work with CEA Coordinating Entity to complete a detailed program description for any new program receiving funding under this Exhibit, as well as when making any changes to program criteria for existing programs, to be used as the basis for client referrals through CEA.

## SEATTLE/KING COUNTY CONTINUUM OF CARE COMMUNITY STANDARDS

Programs providing confidential, domestic violence housing and services are exempt from filling vacancies through the homeless housing and services CEA. DV programs can access homeless housing resources for survivors while in confidential emergency shelter by utilizing the [CEA assessment process](#). Programs serving survivors of domestic violence should be utilizing the Day One Program, a secure and confidential internet site that connects DV programs, allowing them to share “real-time” available bed space and information about services. Additionally, providers will actively participate in the King County Coalition Ending Gender-Based Violence coordination efforts for other DV resources.

### Procedures

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Please see the CEA Operations Manual for all required policies and procedures for programs.

### Documentation

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Any exceptions for participation that are granted will be in writing and all relevant funders will be notified.

### CoC/ESG Interim Rule Citation

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CoC Interim Rule, § 578.23(c)(9); this citation is found on page 67 of the formatted version of the [CoC Interim Rule](#)

ESG Interim Rule, § 576.400(d)

## P. Preserving & Maintaining Family Composition (Involuntary Family Separation)

### Background

Any group of people that present together for assistance and identify themselves as a family, regardless of age or relationship or other factors, are a family and must be served together as such. Further, a program receiving funds under the ESG or CoC Programs cannot discriminate against a group of people presenting as a family. Family includes, but is not limited to, regardless of marital status, actual or perceived sexual orientation, or gender identity, any group of persons presenting for assistance together with or without children and irrespective of age, relationship, or whether a member of the household has a disability. A child who is temporarily away from the home because of placement in foster care is considered a member of the family.

This policy applies to any project under ESG or the CoC Program, including faith-based organizations that accept funds through these programs.

“Family member” means any member of a household as defined or identified by the household, and is not limited to persons related by birth, adoption, or marriage. *Family* includes, but is not limited to, regardless of marital status, actual or perceived sexual orientation, or gender identity, any group of persons presenting for assistance together with or without children and irrespective of age, relationship, or whether a member of the household has a disability. A child who is temporarily away from the home because of placement in foster care is considered a member of the family.

- *Any group of people that present together for assistance and identify themselves as a family, regardless of age or relationship or other factors, are considered to be a family and must be served together as such. Further, a recipient or subrecipient receiving funds under the ESG or CoC Programs cannot discriminate against a group of people presenting as a family based on the composition of the family (e.g., adults and children or just adults), the age of any member’s family, the disability status of any members of the family, marital status, actual or perceived sexual orientation, or gender identity.)*

### Rationale

Families experiencing homelessness should not be separated when receiving services unless the health and well-being of children are at imminent risk. The age and gender of a child under 18 shall not be used as a basis for denying a family’s admission to any housing services. This policy furthers equity for families who do not traditionally identify as at least one adult with at least one child under the age of 18.

### Policy Statement

- A broad definition of family must be used that allows for single parent households of any gender identify, two parent households including same-sex parents and LGBT parents, and extended families to be served together with their children.
- CoC and ESG providers that serve families may not use the age or gender of a family member under 18 as the basis for denying admission to a family.
- While it is acceptable for a shelter or housing program to limit assistance to households with children, it may not limit assistance to only women with children. Such a shelter must also serve the following family types, should they present, in order to be in compliance with the Equal Access rule:
  - Single male head of household with minor child(ren); and
  - Any household made up of two or more adults, regardless of sexual orientation, marital status, or gender identity, presenting with minor child(ren).

## SEATTLE/KING COUNTY CONTINUUM OF CARE COMMUNITY STANDARDS

- In this example, the emergency shelter or housing program would not be required to serve families composed of only adult members and could deny access to these types of families provided that all adult-only families are treated equally, regardless of sexual orientation, marital status, or gender identity.
- The CoC will work closely with providers to ensure that placement efforts are coordinated to avoid involuntary family separation, including referring clients for the most appropriate services and housing to match their needs.
- Programs will support household composition changes (when family members are added or removed from a household) to the extent possible by permitting the household to remain in their unit or by facilitating an internal move within the program should an appropriate unit be available.

### Documentation

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- All members of a household will be recorded appropriately (in HMIS, client intake forms, etc.)
- Program eligibility requirements include the definition noted in this policy

### CoC/ESG Interim Rule Citation

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24 CFR Part 5, § 5.100- § 5.106- The rule begins on page 20 of the Equal Access Rule document

HUD AAQ re: [Family Status](#)

### Q. Rent Reasonableness Standards

#### Background

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Rent reasonableness standards are designed to ensure that rents being paid are reasonable in relation to rents being charged for comparable units in the same market. Programs must have a procedure in place to ensure that compliance with rent reasonableness standards are documented prior to executing the lease.

#### Rationale

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Rent Reasonableness Policies ensure equitable standards (rent being paid) in relation to comparable units in the same market.

#### Policy Statement

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Programs are responsible for determining what documentation is required in order to ensure the rent reasonableness standard is met for a particular unit. Programs should determine rent reasonableness by considering the gross rent of the unit and the location, quality, size, type, and age of the unit, and any amenities, maintenance, and utilities to be provided by the owner. Comparable rents can be checked by reviewing advertisements for comparable rental units.

#### Procedure

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Programs must have a procedure in place to ensure that compliance with rent reasonableness standards are documented prior to executing the lease.

#### Documentation

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<https://www.hudexchange.info/resources/documents/CoC-Rent-Reasonableness-and-FMR.pdf>

<https://www.hudexchange.info/resources/documents/RentReasonableChecklist.pdf>

## SEATTLE/KING COUNTY CONTINUUM OF CARE COMMUNITY STANDARDS

### R. Requirements for Faith-based Programs

#### Background

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Per CoC Interim Rule, § 578.87(b), Federal funds cannot be used to provide or discriminate against participants based on religion or religious belief.

#### Rationale

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This policy aligns with Federal requirements and promotes the religious freedom of program participants.

#### Policy Statement

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Faith-based programs that receive federal funds must ensure that:

- Recipients and sub-recipients of program funds shall not, in providing program assistance, discriminate against a program participant or prospective program participant based on religion or religious belief.
- Current program participants of a faith-based program shall not discriminate against current or prospective program beneficiaries based on religion, a religious belief, a refusal to hold a religious belief, or a refusal to attend or participate in a religious practice.
- HUD program funds may not be used for the acquisition, construction, or rehabilitation of structures to the extent that those structures are used for explicitly religious activities.

Programs must ensure:

- Any engagement in explicitly religious activities must be performed and offered outside of programs that are supported with federal financial assistance separately, in time or location, from the programs or services funded the CoC/ESG program.
- Participation in any such explicitly religious activities must be voluntary for the program beneficiaries of the CDBG or HUD-funded programs or services.
- CoC/ESG program funds do not support any explicitly religious activities, including activities that involve overt religious content, such as worship, religious instruction, or proselytization, or any manner prohibited by law. The alternate provider must be in geographic proximity to the organization making the referral, unless the nature of the services is virtual (telephone, internet, etc.).
- Participants are not discriminated against based on religion or religious belief.

#### Documentation

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- Program marketing materials affirm the acceptance of all eligible participants regardless of religion or religious belief
- Service offerings and related marketing/advertising tools make clear any religious activities and offerings follow the above policy
- Objections to ongoing services made by participants or prospective participants due to the religious nature of the program will be documented in client files and all steps taken to coordinate a referral to an alternative provider will be noted

#### CoC/ESG Interim Rule Citation

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CoC Interim Rule, § 578.87(b); ESG Interim Rule, § 576.406

## S. Screening and Intake Procedures

### Background

Screening and intake processes are a critical step in building relationship with program participants. It is also a critical point in time when Housing First principles can be utilized or not. Housing First practices adopt a screen in approach, when program staff have an opportunity to identify how their services and programs can be made available to people.

### Rationale

Screening and Intake policies ensure program funds are used in accordance with the requirements of participant eligibility in the CoC or ESG Interim Rule, and programs must establish and maintain sufficient records to enable HUD and the contract administrator to determine whether the program is meeting these requirements. Screening and intake policies also ensure alignment with Housing First principles and promote access for communities of color and other marginalized groups.

### Policy Statement

Programs must have written policies and procedures in place that outline how required participant records are obtained. They must also document each program participant's homeless status, including having written policies and procedures that require documentation at intake of homeless status. Additional details can be found in Section V.

### Programs will:

- Clearly identify which staff role(s) are responsible for obtaining specific pieces of documentation
- Document at what point in the service relationship should staff begin collecting documentation
  - For example, homeless status (or chronic status for dedicated programs) is required to enroll; annual income is only required to calculate rent/occupancy charge, not to establish eligibility for CoC programs; a participant may enroll with a self-statement that they will provide the program with the income documentation needed to calculate rent/occupancy charge
- Identify any assessments, standard intakes or questionnaires, or tools staff should use to meet establish eligibility or service mix, for example, staff may use a standardized assessment to determine annual service mix or need
- Document staff due diligence
  - At times self-certification of homeless status and income are allowable types of documentation. Policies and procedures should outline how staff should document efforts to obtain third party documentation before moving to self-certification. This can often be done by providing a prompt on a self-certification form to allow staff to explain in writing why self-certification was used.
- Programs must use the following order of priority for obtaining documentation:
  - **Third party documentation (first)** - Includes HMIS records that retain an auditable history of all entries where the HMIS prevents overrides or changes to dates, including the person who entered data, the date of entry/date change was made
  - **Intake worker observations (second)**
  - **Self-certification (third)**
- Lack of third party documentation must not prevent an individual or family from being immediately admitted to shelter, or receiving services provided by street outreach or victim service providers. Lastly, in addition to

## SEATTLE/KING COUNTY CONTINUUM OF CARE COMMUNITY STANDARDS

homeless status, your program may have additional eligibility requirements per the CoC NOFA round it was funded under, or your grant agreement terms.

- **Annual Income:** For each participant who receives housing assistance where rent or an occupancy charge is paid by the participant, documentation of annual income is required.
  - In addition, ESG homelessness prevention requires an income determination at intake to ensure participant meets income eligibility requirement of 30% or less of Area Median Income (AMI).
  - Additionally, please refer to Seattle/King County's written standards to determine if your program must adhere to specified annual income limits.
  - Income documentation may include:
    - Source documents (wage statements, benefits letters, etc.)
    - Letter from third party source, to the extent source documents are unavailable
    - Written certification by program intake staff of oral verification by the source
    - Self-certification from participant for anticipated income for the next three months, to the extent the above documentation options are unavailable
  - Income should be calculated using [HUD's Part 5 requirements](#)
- **Services and assistance provided to the program participant**
  - Ongoing services and assistance provided to the participant (referrals, service interventions, resources) should be documented in the participant file
  - CoC/ESG Rapid Re-Housing programs must also document that the case manager and participant have met no less than once per month to assist the program participant in ensuring long term housing stability.
  - ESG homelessness prevention programs must document need and eligibility quarterly.
  - If a program participant remains in the program for a year or more, an annual assessment of the current mix is required for CoC programs, and an annual assessment of need is required for ESG participants; this should be done in conjunction with the participant and his/her self-identified goals

### Documentation

See HUD's resource, [Recordkeeping Requirements and Criteria for the Homeless Definition](#) for each category's definition, types of documentation accepted, and HUD's preferred order of documentation.

Program documentation shall include:

- Job descriptions that outline staff roles related to intake/screening and documentation collection
- Copies of documentation needed for eligibility in all participant files
- Completed intake forms and assessments (as relevant) in all participant files
- Signed self-certification forms when applicable and all efforts staff have taken to document third party documentation of homeless and income status

### CoC/Interim Rule Citation

[CoC Interim Rule, § 578.103\(a\)\(3\), § 578.103\(a\)\(4\), § 578.103\(a\)\(6\), § 578.103\(a\)\(7\)](#) - (this citation is found on page 110-111 of the formatted version of the CoC Interim Rule)

ESG Interim Rule, § 576.500oC/ESG Interim Rule Citation

## T. Termination of Assistance

### Background

The termination of assistance policy is a specific component of a Housing First approach which aims to minimize barriers to maintaining housing.

### Rationale

The Termination of Assistance policy reinforces the community's approach to proactively engage with participants in solutions to maintain their housing. The policy protects participants for arbitrary reasons of termination and limits the use of termination to manage programs. It is also a goal of the CoC to prevent reoccurrences of homelessness.

### Policy Statement

Provider-initiated termination of housing assistance should be rare and used only as a last resort to ensure safety or compliance with regulations, laws, or the signed lease agreement. Agency and programs are expected to maintain a low-barrier, housing –first approach and only terminate assistance in the most severe cases.

The program may terminate assistance to a program participant who violates program requirements or conditions of occupancy, however, **termination does not bar the project from providing further assistance later to the same household.**

Due process must be given to each participant when terminating assistance which includes providing a formal process that recognizes the rights of individuals receiving assistance under the due process of law.

### Programs must:

- Provide the participant with a written copy of any participant responsibilities and the termination process before the participant begins to receive assistance;
- Provide written notice to the participant containing a clear statement of termination reasons;
- Offer a review of any termination decisions, in which the participant is given the opportunity to present written or oral objections before a person other than the person (or a subordinate of that person) who made or approved the termination decision; and provide written notice of the final decision to the participant;
- Staff will review the policy and possible termination causes verbally with all participants upon entry.

### Procedures

Procedures must specify how many business days each part of the termination process will take to give staff prompt timeliness standards and participants a transparent experience.

### Documentation

#### Documentation should include:

- Signed acknowledgement of receipt of the termination policy for all program participants
- Written documentation of termination reasons (signed by participant when possible)
- Copy of any written objections (or a notation in the file of any verbal objections) made by the participant, and any action taken by staff
- Signed acknowledgement of receipt of the final decision made by program staff of any further objection made by participant (or a copy of the notice when a signature isn't possible)

CoC/ESG Interim Rule Citation

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CoC Interim Rule, §[578.91](#) (page 103 of the formatted version of the CoC Interim Rule)

ESG Interim Rule, § 576.500

### U. Unit Inspections

#### Background

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Documented habitability is required for all housing units into which households will be moving, (except when a household moves in with friends or family and there are no federal funds in the subgrantee contract). Housing units must be documented as habitable prior to paying the rent subsidy and information kept in the client file.

#### Rationale

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Regular inspections ensure the health and safety of program participants, prevent and proactively address challenges and concerns with living conditions, and are used as opportunities to provide education and support.

#### Policy Statement

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Program staff will review unit inspection policies with participants at time of intake.

Policies will also include methods in which participants can notify program staff of any health or safety concerns related to the conditions of their housing unit (or dwelling space in case of communal sites with private or shared sleeping accommodations).

Programs should conduct a unit inspection prior to signing a lease (both rental assistance and site-based programs). Programs should also be familiar and compliant with any specific regulations by fund sources and/or specific program models.

Programs should have policies in place to ensure staff provide regular inspections of facility and/or rental units. Staff may use home visits as an opportunity for informal visual inspections of unit conditions. After move-in, unit inspections or site visits should be done with the participant present. Programs must have written procedures describing the response to complaints regarding unit safety and habitability.

- This procedure must include:
  - The method of informing each household of the habitability complaint process.
  - Assurances that complaints regarding their housing unit's safety and habitability will not affect the household's program eligibility.
  - Mandatory inspection when a complaint is reported using the HHS form, HQS form, or documenting the specific complaint in an alternate format that includes follow-up and resolution.

#### Procedures

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Programs will have procedures in place to communicate and/or address/respond to any damages and repairs. In cases when programs are utilizing external housing providers or landlords, staff should be advocating for and educating landlords on their responsibilities to address health and safety conditions.

Program staff will work with participants to provide education, supplies, and other tools to ensure participants know how to and can address issues of cleanliness or other health and safety issues caused by participants.

#### Documentation

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## SEATTLE/KING COUNTY CONTINUUM OF CARE COMMUNITY STANDARDS

Unit inspection policies are included in lease terms or other program description literature.

Documentation of inspection or habitability certification must be kept in the client file.

## V. Program Models

A range of housing models and strategies are needed to address the diverse needs of people experiencing homelessness. However, a common set of standardized definitions are required to promote a shared understanding of key terms countywide. It is expected that funding applicants adhere to the housing definitions here and be clear about the population they plan to serve, the housing model they will use, and how services will fit the needs of the project participants. *Please note that these definitions are subject to change over time.*

### A. Diversion

#### Background

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A flexible short-term intervention that assists households experiencing homelessness with innovative solutions to overcome their housing crisis and avoid entering the shelter system whenever possible, moving families quickly from homelessness to housing.

#### Rationale

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Diversion strategies reduce the length of time a household experiences homelessness and ensures limited homeless housing resources are targeted for households with the highest need.

#### Policy Statement

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While the tools and strategies of Diversion can be applied across the homeless response system as a set of Housing First tools, this policy applies to any programs operating Diversion as a model.

***Eligibility: To be developed***

***Screening & Intake Procedures: To be developed***

#### Documentation

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Additional guidance is provided in the:

- Seattle/King County Integrating Principles of Diversion in our Homeless Response System guidance.
- King County Coordinated Entry for All (CEA) Path to Home Operations Manual

### B. Emergency Shelter

#### Background

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Emergency Shelter is defined as temporary shelter from the elements and unsafe streets for individuals and families experiencing homelessness. Shelter programs are either fixed capacity (facility-based) or flexible capacity (for example, hotel/motel vouchers). Emergency shelters typically address the basic health, food, clothing, and personal hygiene needs of the households that they serve and provide information and referrals about supportive services and housing. Emergency Shelters are indoors and range from mats on the floor in a common space to beds in individual units. Some shelters are overnight only, while others operate 24/7.

#### Rationale

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Emergency shelters provide immediate, low barrier respite from sleeping outdoors and access to basic needs and services. Increasingly important is access to housing-focused services to reduce a household's episode of homelessness and increase the rate in which households return to permanent housing.

#### Policy Statement

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##### ***Eligibility:***

Individuals and Families defined as Homeless (per HUD Continuum of Care Definition 24 CFR 578.3) under the following categories are eligible for assistance in ES projects:

##### **Category 1–Literally Homeless**

Individual or family who lacks a fixed, regular, and adequate nighttime residence, meaning:

- Has a primary nighttime residence that is a public or private place not meant for human habitation;
- Is living in a publicly or privately-operated shelter designated to provide temporary living arrangements (including congregate shelters, TH, and hotels and motels paid for by charitable organizations or by federal, state and local government programs); or
- Is exiting an institution where he/she has resided for 90 days or less and who resided in an emergency shelter or place not meant for human habitation immediately before entering that institution.

##### **Category 4, Fleeing or Attempting to Flee a Domestic Violence Situation**

Any individual or family who:

- Is fleeing, or is attempting to flee, domestic violence;
- Has no other residence; and
- Lacks the resources or support networks to obtain other permanent housing.

Young Adults who are imminently at risk of homelessness (within 14 days).

##### ***Screening and Intake Procedures:***

Programs will operate from a low barrier model/approach with limited requirements or criteria for screening which would prohibit access to needed emergency services. No additional screening criteria will be in place beyond what has been asked of or agreed upon by program funder(s).

Emergency shelter programs will not charge fees for shelter access/participation.

#### Documentation

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## SEATTLE/KING COUNTY CONTINUUM OF CARE COMMUNITY STANDARDS

HUD requires that each client file contain documentation of homeless status and other program eligibility. Listed below are the approved documentation requirements.

### **DOCUMENTATION OF HOMELESS STATUS:**

1. Third Party: Preferred method of documentation. This step must be attempted first.
  - a. Oral or written verification from a third party verifying current homeless status of client.
  - b. The documentation must include reference to type of homelessness to determine which HUD Category the person meets.
  - c. Third party source can be: case manager, outreach worker, landlord evicting person, or family/friend kicking person out.
  - d. Written verification can include: HMIS report, written letter or other already available documentation.
2. Intake observation: Allowable after unsuccessfully attempting Third Party documentation.
  - a. Homeless program staff self-verifies status based on observation, program record or HMIS record.
  - b. Documentation must be written, include information related to type of homelessness, and include how staff first attempted to obtain Third Party verification.
3. Self-certification: Allowable only after unsuccessfully attempting third party or intake observation.
  - a. Letter written and signed by client briefly explaining homelessness and that they have no resources or safe place to stay.

See HUD's resource, [Recordkeeping Requirements and Criteria for the Homeless Definition](#) for each category's definition, types of documentation accepted, and HUD's preferred order of documentation.

### C. Outreach & Engagement

#### Background

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Outreach and Engagement services are coordinated, person-centered, and persistent, bring services directly to the people experiencing homelessness who might not seek out services and connecting them to permanent housing and necessary supports.

#### Rationale

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Outreach services engage with households who may not be interested in engaging in traditional services or participating in emergency shelter. They may be households who have experienced chronic episodes of homelessness, who may be living with behavioral health needs, and/or are otherwise wary of mainstream systems of care. Outreach and engagement services are critical in ensuring all people have opportunities to access and engage in the services they want and need, and to be treated with equal compassion and dignity.

#### Policy Statement

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**Eligibility:** The targeted population includes those who are living unsheltered, with attention to those who are not already engaged in or participating in services.

**Screening and Intake Procedures:** Programs will operate from a low barrier model/approach with limited requirements or criteria for screening which would prohibit access to needed services. Initial contact may be focused on establishing and building a trusting relationship.

The service orientation will adopt a Housing first approach and staff will discuss and offer housing options without conditions of sobriety, service participation, or program completion.

#### Documentation

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Additional details and strategies can be found at [the United Way of King County's Streets to Home](#) program.

## D. Permanent Housing with Supports (i.e. other permanent housing)

### Background

Non-time limited affordable housing for households experiencing homelessness with a high to medium level of service needs. The tenant holds a rental agreement, with individualized services offered for the homeless household to maintain housing stability. Programs and services are available on or off-site and may be through community-based partnerships.

### Rationale

Permanent Housing with Supports (or other permanent housing) in the homeless housing system offers permanent housing for households whose primary barrier to housing stability is financial. Not all households experiencing homelessness need intensive, ongoing supportive services. This model provides a Housing First alternative to Permanent Supportive Housing and functions similarly to Rapid Re-housing with the exception that rental assistance is on-going.

### Policy Statement

#### **Eligibility:**

#### **Category 1—Literally Homeless**

Individual or family who lacks a fixed, regular, and adequate nighttime residence, meaning:

- Has a primary nighttime residence that is a public or private place not meant for human habitation;
- Is living in a publicly or privately-operated shelter designated to provide temporary living arrangements (including congregate shelters, TH, and hotels and motels paid for by charitable organizations or by federal, state and local government programs); or
- Is exiting an institution where he/she has resided for 90 days or less and who resided in an emergency shelter or place not meant for human habitation immediately before entering that institution.

#### **Category 4, Fleeing or Attempting to Flee a Domestic Violence Situation**

Any individual or family who:

- Is fleeing, or is attempting to flee, domestic violence;
- Has no other residence; and
- Lacks the resources or support networks to obtain other permanent housing.

Young Adults who are imminently at risk of homelessness (within 14 days).

Transitional Housing programs operating in (or working with landlords in) the City of Seattle will also need to comply with the City's Fair Chance Ordinance.

**Screening and Intake Procedures:** Programs will operate from a low barrier model/approach with limited requirements or criteria for screening which would prohibit access to needed emergency services. No additional screening criteria will be in place beyond what has been asked of or agreed upon by your funder.

Program staff will work with applicants/referred clients to secure needed documentation and will limit the burden on participants to navigate those systems independently. Programs will also ensure that they are collecting only documentation requested or necessary by funders at time of intake. Program staff may work with participants after intake to collect other needed documentation in a reasonable period of time to streamline and expedite intake and move in procedures. Refer to all capital and other fund sources for additional guidance.

## SEATTLE/KING COUNTY CONTINUUM OF CARE COMMUNITY STANDARDS

Other policies should include the following components:

- Programs and services are available on or off-site and may be through community-based partnerships.
- Tenant holds a rental agreement or lease and may continue tenancy if rent is paid, and the tenant complies with the rental agreement or lease. There is no limits on length of tenancy if lease terms and conditions are met. See Lease Policy for additional requirements.
- Programs must have a standardized procedure for determining the amount of rent subsidy for each household, the length of assistance and if there will be any adjustments over time. The procedure should include a consideration of the household's resources and expenses. Although each household may receive a different amount of rent subsidy, the procedure for determining the subsidy must be standardized. Rent limits are adjusted annually based on HUDs Fair Market Rent (FMR) for King County.
- Services are available and encouraged but are not to be required as a condition of tenancy.
- There is ongoing communication and coordination between supportive service providers, property owners or managers, and/or housing subsidy programs.
- Affordable housing, meaning the tenant pays no more than 30% of income towards rent
- Coordination with key partners to address issues resulting from substance use, mental health and other crises, focused on housing stability
- May be facility-based or scattered-site

### Documentation

HUD requires that each client file contain documentation of homeless status and other program eligibility. Listed below are the approved documentation requirements.

#### **DOCUMENTATION OF HOMELESS STATUS:**

1. Third Party: Preferred method of documentation. This step must be attempted first.
  - a. Oral or written verification from a third party verifying current homeless status of client.
  - b. The documentation must include reference to type of homelessness to determine which HUD Category the person meets.
  - c. Third party source can be: case manager, outreach worker, landlord evicting person, or family/friend kicking person out.
  - d. Written verification can include: HMIS report, written letter or other already available documentation.
2. Intake observation: Allowable after unsuccessfully attempting Third Party documentation.
  - a. Homeless program staff self-verifies status based on observation, program record or HMIS record.
  - b. Documentation must be written, include information related to type of homelessness, and include how staff first attempted to obtain Third Party verification.
3. Self-certification: Allowable only after unsuccessfully attempting third party or intake observation.
  - a. Letter written and signed by client briefly explaining homelessness and that they have no resources or safe place to stay.

### CoC/ESG Interim Rule Citation

## E. Permanent Supportive Housing

### Background

**Permanent Supportive Housing (PSH)** Non-time limited affordable housing for a household that is homeless on entry, and has a condition or disability, such as mental illness, substance abuse, chronic health issues, or other conditions that create multiple and serious ongoing barriers to housing stability. Households need a long-term high level of services in order to meet the obligations of tenancy and maintain their housing. Tenant holds a rental agreement or lease and may continue tenancy as long as rent is paid, and the tenant complies with the rental agreement or lease. Tenants have access to a flexible array of comprehensive services, mostly on site, such as medical and wellness, mental health, substance abuse, vocational/employment, and life skills. Services are available and encouraged but are not to be required as a condition of tenancy. There is ongoing communication and coordination between supportive service providers, property owners or managers, and/or housing subsidy programs. Permanent Supportive Housing may be facility-based or with scattered-site.

### Rationale

Permanent Supportive Housing provides a Housing First approach for extremely vulnerable households who need ongoing access to intensive supportive services to maintain housing stability. PSH improves health and housing outcomes for people experiencing chronic homelessness and who are living with severe and persistent disabilities.

### Policy Statement

**Eligibility:** Household is eligible for PSH when there is a household member with a disability and meet the Category 1 definition of homelessness -

#### Category 1—Literally Homeless

Individual or family who lacks a fixed, regular, and adequate nighttime residence, meaning:

- Has a primary nighttime residence that is a public or private place not meant for human habitation;
- Is living in a publicly or privately-operated shelter designated to provide temporary living arrangements (including congregate shelters, TH, and hotels and motels paid for by charitable organizations or by federal, state and local government programs); or
- Is exiting an institution where he/she has resided for 90 days or less and who resided in an emergency shelter or place not meant for human habitation immediately before entering that institution.

#### Category 4, Fleeing or Attempting to Flee a Domestic Violence Situation

Any individual or family who:

- Is fleeing, or is attempting to flee, domestic violence;
- Has no other residence; and
- Lacks the resources or support networks to obtain other permanent housing.

Young Adults who are imminently at risk of homelessness (within 14 days).

The term 'homeless individual with a disability' means an individual who is homeless, as defined in section 103, and has a disability that—

- is expected to be long-continuing or of indefinite duration;
  - substantially impedes the individual's ability to live independently;

## SEATTLE/KING COUNTY CONTINUUM OF CARE COMMUNITY STANDARDS

- could be improved by the provision of more suitable housing conditions; and
- is a physical, mental, or emotional impairment, including an impairment caused by alcohol or drug abuse, post-traumatic stress disorder, or brain injury;
- is a developmental disability, as defined in section 102 of the Developmental Disabilities Assistance and Bill of Rights Act of 2000 (42 U.S.C. 15002); or
- is the disease of acquired immunodeficiency syndrome or any condition arising from the etiologic agency for acquired immunodeficiency syndrome.

Transitional Housing programs operating in (or working with landlords in) the City of Seattle will also need to comply with the City's Fair Chance Ordinance.

**Screening and Intake Procedures:** Programs will operate from a low barrier model/approach with limited requirements or criteria for screening which would prohibit access to housing and services. No additional screening criteria will be in place beyond what has been asked of or agreed upon by your funder.

Program staff will work with applicants/referred clients to secure needed documentation and will limit the burden on participants to navigate those systems independently. Programs will also ensure that they are collecting only documentation requested or necessary by funders at time of intake. Program staff may work with participants after intake to collect other needed documentation in a reasonable period of time to streamline and expedite intake and move in procedures. Refer to all capital and other fund sources for additional guidance.

Local Permanent Supportive Housing (PSH) programs should adopt and follow the federally mandated CoC Coordinated Entry (CEA) process through which all clients are identified, assessed and triaged. Refer to the Coordinated Entry section for more details on this process.

- Programs and services are available on or off-site and may be through community-based partnerships.
- Tenant holds a rental agreement or lease and may continue tenancy if rent is paid, and the tenant complies with the rental agreement or lease. (See Lease Requirement Policy for additional information.)
- Programs must have a standardized procedure for determining the amount of rent subsidy for each household, the length of assistance and if there will be any adjustments over time. The procedure should include a consideration of the household's resources and expenses. Although each household may receive a different amount of rent subsidy, the procedure for determining the subsidy must be standardized. Rent limits are adjusted annually based on HUDs Fair Market Rent (FMR) for King County.
- Tenants have access to a flexible array of comprehensive services, mostly on site, such as medical and wellness, mental health, substance abuse, vocational/employment, and life skills.
- Services are available and encouraged but are not to be required as a condition of tenancy.
- There is ongoing communication and coordination between supportive service providers, property owners or managers, and/or housing subsidy programs.
- Permanent Supportive Housing may be facility-based or with scattered-site.
- Proactive engagement with residents to offer a comprehensive array of flexible services which are NOT required as a condition of tenancy such as medical and wellness, mental health, substance abuse, vocational/employment, and life skills
- Coordination with key partners to address issues resulting from substance use, mental health and other crises, focused on housing stability

## SEATTLE/KING COUNTY CONTINUUM OF CARE COMMUNITY STANDARDS

- Support tenants in connecting with community-based resources and activities while building strong social support networks
- Programs should help people who have achieved stability in supportive housing—who no longer need and desire to live there—to move into affordable housing to free units for others who need it.

### Documentation

HUD requires that each client file contain documentation of homeless status and other program eligibility. Listed below are the approved documentation requirements.

#### **DOCUMENTATION OF HOMELESS STATUS:**

1. Third Party: Preferred method of documentation. This step must be attempted first.
  - a. Oral or written verification from a third party verifying current homeless status of client.
  - b. The documentation must include reference to type of homelessness to determine which HUD Category the person meets.
  - c. Third party source can be: case manager, outreach worker, landlord evicting person, or family/friend kicking person out.
  - d. Written verification can include: HMIS report, written letter or other already available documentation.
2. Intake observation: Allowable after unsuccessfully attempting Third Party documentation.
  - a. Homeless program staff self-verifies status based on observation, program record or HMIS record.
  - b. Documentation must be written, include information related to type of homelessness, and include how staff first attempted to obtain Third Party verification.
3. Self-certification: Allowable only after unsuccessfully attempting third party or intake observation.
  - a. Letter written and signed by client briefly explaining homelessness and that they have no resources or safe place to stay.

#### **DOCUMENTATION OF A DISABILITY INCLUDES:**

- Written verification of the disability from a professional licensed by the state to diagnose and treat the disability and his or her certification that the disability is expected to be long-continuing or of indefinite duration and substantially impedes the individual's ability to live independently; OR
- Written verification from the Social Security Administration; OR
- The receipt of a disability check; OR
- Intake staff-recorded observation of a disability that, no later than 45 days of the application for assistance, is confirmed and accompanied by evidence in this; OR
- Other documentation approved by HUD.

### CoC/ESG Interim Rule Citation

[24 CFR 578.7\(a\)\(9\)\(v\)](#)

24 CFR 578.37(a)(1)(i)

## F. Rapid Rehousing

### Background

Rapid Re-housing (RRH) is a low-barrier, time-limited intervention connecting households experiencing homelessness to permanent housing through a tailored package of assistance. RRH includes three core components: 1) Housing Identification, 2) Move-in and Rental Assistance, and 3) Housing-Focused Case Management Services and Supports. Housing-focused case management is provided, with an emphasis on immediate efforts to obtain housing, utilizing the minimum assistance needed to resolve each household's immediate housing crisis. Once a household moves into permanent housing (tenant holds the lease), rental assistance may be provided, utilizing a progressive engagement approach to provide the appropriate level of assistance, starting with the least amount necessary to stabilize housing. Frequent re-assessment will be used to establish continued eligibility and amount of continued rental subsidy. The services are time-limited, and the household does not have to leave the housing when services end. RRH staff work with each household to identify and refer households to other resources in the community (mainstream services, benefit services, food assistance programs, childcare resources, etc.) to support on-going household and housing stability.

### Rationale

Rapid Re-housing is a Housing First approach that assists households in reducing the time they experience homelessness. It provides flexible and tailored rental assistance and services to meet the unique needs of each household, and maximizes the available resources across the entire system by not offering too little or too many services for any particular household.

### Policy Statement

#### **Eligibility:**

Individuals and families defined as Homeless under the following categories are eligible for assistance in RRH projects:

#### **Category 1–Literally Homeless**

Individual or family who lacks a fixed, regular, and adequate nighttime residence, meaning:

- Has a primary nighttime residence that is a public or private place not meant for human habitation;
- Is living in a publicly or privately-operated shelter designated to provide temporary living arrangements (including congregate shelters, TH, and hotels and motels paid for by charitable organizations or by federal, state and local government programs); or
- Is exiting an institution where he/she has resided for 90 days or less and who resided in an emergency shelter or place not meant for human habitation immediately before entering that institution.

(Households must meet the HUD definition of literal homelessness, which stipulates that families or individuals in transitional housing are not eligible for RRH. There are no other criteria or preconditions to enrollment in RRH other than homeless status)

#### **Category 4: Fleeing/Attempting to Flee Domestic Violence**

Any individual or family who:

- Is fleeing, or is attempting to flee, domestic violence;
- Has no other residence; and
- Lacks the resources or support networks to obtain other permanent housing.

## SEATTLE/KING COUNTY CONTINUUM OF CARE COMMUNITY STANDARDS

Young Adults who are imminently at risk of homelessness (within 14 days).

**Screening and Intake Procedures:** Programs will operate from a low barrier model/approach with limited requirements or criteria for screening which would prohibit access to housing and services. No additional screening criteria will be in place beyond what has been asked of or agreed upon by your funder, though housing providers and landlords in the private market may establish their own criteria for screening.

Program staff will work with applicants/referred clients to secure needed documentation and will limit the burden on participants to navigate those systems independently. Programs will also ensure that they are collecting only documentation requested or necessary by funders at time of intake. Program staff may work with participants after intake to collect other needed documentation in a reasonable period of time to streamline and expedite intake and move in procedures. Refer to all capital and other fund sources for additional guidance.

Transitional Housing programs operating in (or working with landlords in) the City of Seattle will also need to comply with the City's Fair Chance Ordinance.

Per 24 CFR part 578.37(a)(1)(ii), CoC's must establish policies and procedures for determining and prioritizing which eligible individuals and families will receive rapid rehousing assistance. RRH programs should adopt and follow our federally mandated CoC Coordinated Entry (CEA) process through which all clients are identified, assessed and referred to housing. Refer to the Coordinated Entry section for more details on this process. RRH policies should include:

- Housing-focused case management, with an emphasis on immediate efforts to obtain housing, utilizing the minimum assistance needed to resolve each household's immediate housing crisis.
- Low barrier, housing first intervention offered with no preconditions to enrollment other than homeless status
- Services and financial support tailored to the unique needs of the household through a progressive engagement approach where the minimum amount of services is provided before increasing support to meet the needs of the household
- Once a household moves into permanent housing (tenant holds the lease), rental assistance may be provided, utilizing a progressive engagement approach to provide the appropriate level of assistance, starting with the least amount necessary to stabilize housing.
- Frequent re-assessment will be used to establish continued eligibility and amount of continued rental subsidy.
- The services are time-limited, and the household does not have to leave the housing when services end. RRH staff work with each household to identify and refer households to other resources in the community (mainstream services, benefit services, food assistance programs, childcare resources, etc.) to support on-going household and housing stability.
- Services and financial support tailored to the unique needs of the household through a progressive engagement approach where the minimum amount of services is provided before increasing support to meet the needs of the household

### Documentation

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#### **DOCUMENTATION OF HOMELESS STATUS:**

1. Third Party: Preferred method of documentation. This step must be attempted first.
  - a. Oral or written verification from a third party verifying current homeless status of client.
  - b. The documentation must include reference to type of homelessness to determine which HUD Category the person meets.

## SEATTLE/KING COUNTY CONTINUUM OF CARE COMMUNITY STANDARDS

- c. Third party source can be: case manager, outreach worker, landlord evicting person, or family/friend kicking person out.
- d. Written verification can include: HMIS report, written letter or other already available documentation.
- 2. Intake observation: Allowable after unsuccessfully attempting Third Party documentation.
  - a. Homeless program staff self-verifies status based on observation, program record or HMIS record.
  - b. Documentation must be written, include information related to type of homelessness, and include how staff first attempted to obtain Third Party verification.
- 3. Self-certification: Allowable only after unsuccessfully attempting third party or intake observation.
  - a. Letter written and signed by client briefly explaining homelessness and that they have no resources or safe place to stay.

See the [Seattle-King County RRH Guidelines](#) for more information on program requirements for additional information.

## G. Transitional Housing

### Background

Transitional Housing is a time-limited intervention intended to aid households experiencing homelessness who need more intensive or deeper levels of support services to attain permanent housing. Emphasis is still placed on rapid exit to permanent housing, but lengths of stay are flexible and tailored to the unique needs of each household. Services continue to emphasize housing attainment through a housing-focused assessment and housing stability planning, which includes working with each household to identify resources in the community, to make referrals as needed, and to support on-going family and housing stability. All services are person-centered and tailored to the individual needs of each household. Transitional housing comes in a variety of facility-types, from congregate-style living to scattered site apartments.

### Rationale

Most people experiencing homelessness do not require lengthy stays in transitional housing to successfully acquire and sustain permanent housing. People whose primary barrier to housing stability is economic in nature do not require transitional housing, nor do people with serious mental illnesses who may be better served in other program models, such as permanent supportive housing.

Long-term stays in congregate transitional housing programs should therefore be reserved for those individuals with severe or specific needs who choose transitional housing over other services that would help them more quickly reconnect to permanent housing.

### Policy Statement

#### ***Eligibility:***

#### **Category 1—Literally Homeless**

Individual or family who lacks a fixed, regular, and adequate nighttime residence, meaning:

- Has a primary nighttime residence that is a public or private place not meant for human habitation;
- Is living in a publicly or privately-operated shelter designated to provide temporary living arrangements (including congregate shelters, TH, and hotels and motels paid for by charitable organizations or by federal, state and local government programs); or
- Is exiting an institution where he/she has resided for 90 days or less and who resided in an emergency shelter or place not meant for human habitation immediately before entering that institution.

#### **Category 4: Fleeing/Attempting to Flee Domestic Violence**

Any individual or family who:

- Is fleeing, or is attempting to flee, domestic violence;
- Has no other residence; and
- Lacks the resources or support networks to obtain other permanent housing.

Young Adults who are imminently at risk of homelessness (within 14 days).

***Screening and Intake Procedures:*** Programs will operate from a low barrier model/approach with limited requirements or criteria for screening which would prohibit access to housing and services. No additional screening criteria will be in place beyond what has been asked of or agreed upon by your funder, though housing providers and landlords in the private market may establish their own criteria for screening.

## SEATTLE/KING COUNTY CONTINUUM OF CARE COMMUNITY STANDARDS

Program staff will work with applicants/referred clients to secure needed documentation and will limit the burden on participants to navigate those systems independently. Programs will also ensure that they are collecting only documentation requested or necessary by funders at time of intake. Program staff may work with participants after intake to collect other needed documentation in a reasonable period of time to streamline and expedite intake and move in procedures. Refer to all capital and other fund sources for additional guidance.

Transitional Housing programs operating in (or working with landlords in) the City of Seattle will also need to comply with the City's Fair Chance Ordinance.

- Emphasis is placed on rapid exit to permanent housing, but lengths of stay are flexible and tailored to the unique needs of each household.
- Services continue to emphasize housing attainment through a housing- focused assessment and housing stability planning, which includes working with each household to identify resources in the community, to make referrals as needed, and to support on-going family and housing stability.
- Assistance to reduce barriers to housing, including assisting individuals with gathering needed documentation to access permanent housing.
- Lengths of stay are flexible and tailored to the unique needs of each household.
- Connection to community-based resources to support on-going housing stability is provided.
- All services are person-centered and tailored to the individual needs of each household.

Transitional Housing models can vary from congregate-style living to scattered site apartments.

### Documentation

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#### **DOCUMENTATION OF HOMELESS STATUS:**

1. Third Party: Preferred method of documentation. This step must be attempted first.
  - a. Oral or written verification from a third party verifying current homeless status of client.
  - b. The documentation must include reference to type of homelessness to determine which HUD Category the person meets.
  - c. Third party source can be: case manager, outreach worker, landlord evicting person, or family/friend kicking person out.
  - d. Written verification can include: HMIS report, written letter or other already available documentation.
2. Intake observation: Allowable after unsuccessfully attempting Third Party documentation.
  - a. Homeless program staff self-verifies status based on observation, program record or HMIS record.
  - b. Documentation must be written, include information related to type of homelessness, and include how staff first attempted to obtain Third Party verification.
3. Self-certification: Allowable only after unsuccessfully attempting third party or intake observation.
  - a. Letter written and signed by client briefly explaining homelessness and that they have no resources or safe place to stay.

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### CoC/ESG Interim Rule Citation

[24 CFR 578.7\(a\)\(9\)\(ii\); 24 CFR 578.37\(a\)\(ii\)](#)

**Appendix A:** HUD Homelessness Definitions (to be developed)

**Appendix B:** Glossary of Terms (to be developed)

**Appendix C:** Other community documents (to be developed)

**Appendix D:** Racial Equity Analysis (to be developed)