

Thurston County ESG-CV Written Standards

Public Health and Social Services

Office of Housing & Homeless Prevention

Updated March 2023

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1 ESG-CV Basics

1.1 Overview

This document is intended to serve as a guide for subgrantees of the Thurston County Emergency Solutions Grant COVID-19 (ESG-CV) Program, distributed by the WA State Department of Commerce under the Coronavirus Aid, Relief, and Economic Security Act of 2020 (CARES Act). The CARES Act provided for supplemental appropriation of Homeless Assistance Grants under the Emergency Solutions Grant (ESG). The Emergency Solutions Grant COVID-19 (ESG-CV) funds are to be used to prevent, prepare for, and respond to the Coronavirus pandemic. The following definitions may be used:

- Prevent coronavirus means an activity designed to prevent the initial or further spread of the virus to people experiencing homelessness, people at-risk of homelessness, recipient or subrecipient staff, or other shelter or housing residents.
- Prepare for coronavirus: means an activity carried out by a recipient or subrecipient prior to or during a coronavirus outbreak in their jurisdiction to plan to keep people healthy and reduce the risk of exposure to coronavirus and avoid or slow the spread of the disease.
- Respond to coronavirus: means an activity carried out once coronavirus has spread to people experiencing homelessness, provider staff, or once individuals and families lose or are at-risk of losing their housing as a result of the economic downturn caused by the coronavirus.

Projects funded with ESG-CV must be low barrier with a [housing first](#) orientation. Per HUD guidance, individuals and families assisted with these funds must not be required to receive treatment or perform any other prerequisite activities as a condition for receiving shelter, housing, or other services for which these funds are used. For additional information on the low barrier requirement for ESG-CV, see [section 7.2](#).

Households without income are eligible to receive ESG-CV assistance in any of the following components:

- Street Outreach
- Emergency Shelter
- Homelessness Prevention
- Rapid Rehousing

Program regulations are established in [24 CFR §576](#), the HUD ESG Interim Rule ([ESG Program and Consolidated Plan Conforming Amendment of 24 CFR Parts 91 and 576, Docket No. FR-5474-I-01, RIN 2506-AC29](#)) and the [ESG-CV Notice](#) issued September 1, 2020, the [ESG-CV Notice: CPD-21-05](#) issued on April 14, 2021, and the [ESG-CV Notice: CPD-21-08](#) on July 19, 2021.

It is important to note that this document summarizes various grant requirements and is not

intended to replace the regulations listed above or any applicable federal, state, or local laws. Thurston County's written standards define eligible activities and populations to be served which are subsets of what is listed in the ESG Interim Rule.

HUD has a [quick reference guide](#) for use in determining eligible activities and costs under the ESG program, and a helpful [ESG basics](#) sheet.

These guidelines will be updated as necessary throughout the grant period. Subgrantees need to stay in communication about changes to your program's funding, interventions, scope of work, or population served. Thurston County is responsible for updating the Department of Commerce to such changes and helping to ensure HMIS data quality.

Subgrantees of these funds are expected to adopt the WA State Department of Commerce [ESG-CV Guidelines](#), and these written standards to their policies and procedures. Subgrantees are encouraged to also reference the program regulations and grant contract agreement to ensure compliance with the requirements of the ESG-CV program, in addition to this document.

1.2 Document Version

Version	Date Approved	Updates
3.0	In process	<ul style="list-style-type: none">• Added clarification that ES habitability inspection is required annually• Added clarification on LBP requirements• Added equal access policy requirement• Added habitability checklist and lead screen worksheet.
2.0	August 2, 2022	<ul style="list-style-type: none">• Removes emergency shelter acquisition, renovation, rehabilitation as an allowable expense.• Adds guidance on equipment, and corrects HMIS data quality information.• Added requirement that ESG-CV assistance must end if the household is over income at time of recertification.• Revised section to include contract extension through September 30, 2023.• Hotel/Motel stays under 30 days are not required to meet habitability standards.
1.0	July 30, 2021	Creation of written standards for allocation of ESG-CV funding.

1.3 Office of Housing & Homeless Prevention – COVID-19 Response

Thurston County developed its plan to use the COVID-19 ESG-CV funds in consultation with Thurston County Public Health officials, the cities of Olympia, Lacey and Tumwater, local

homeless service providers, and other regional representatives. This plan represents the County's ongoing COVID-19 strategies from the time it was developed in mid-March 2020, based on guidance from public health officials, and the Thurston County Public Health Officer. As the situation and knowledge has progressed, strategies have been adapted to better meet the changing circumstances of the outbreak.

To prevent, prepare for, and respond to the COVID-19 pandemic, Thurston County has identified four categories of activities that it will support with ESG-CV funding. These categories are reviewed on an on-going basis with the Public Health Officer and modified as required by changes in circumstances or public health guidance. Examples of types of activities funded are included in each category.

1) Promote social distancing practices by providing basic survival needs for sheltered and unsheltered persons, including a significant increase in street outreach and access to hygiene.

- Fund shelter in place activities to help individuals living unsheltered access survival supplies and services, as facilities and regularly available service centers closed.
- Fund hygiene stations, handwash stations and portable toilets at various unsheltered and RV encampments to ensure easy access.
- Help connect and coordinate access to cleaning and hygiene supplies with the Thurston County Incident Management Team (IMT) for shelters and homeless service providers.

2) Provide funding to existing shelters to expand to 24/7 operations and to move to 6 feet of separation between beds, as well as congregate shelter bed reduction by funding additional non-congregate shelter.

- Funding hotel room stays for all populations: single adults, families, those fleeing domestic or intimate partner violence, and youth and young adults (YYA), as appropriate.
- Provide funding to create additional shelter space for those displaced due to the 6 feet of separation policies.
- Help fund expanded InterFaith Works shelter for single adults, specifically for those at higher risk of COVID due to age, or other comorbidities.

4) Identify and support opportunities to move individuals directly into housing, by expanding existing funding to Rapid Re-Housing programs.

- Expanded funding to SafePlace Rapid Re-Housing for those fleeing Domestic Violence (DV) or Intimate Partner Violence (IPV).

Thurston County will partner with local organizations and support subgrantees to ensure that mitigation practices are effectively implemented by collaborating with public health officials in disseminating information to those experiencing homelessness. In every effort to minimize the

spread of COVID-19, programs should coordinate to move COVID affected clients to the county quarantine and isolation site, or to support in home or shelter in place isolation. A critical component to infectious disease prevention is ensuring that shelters and housing programs have the necessary supplies in stock to maintain a disease-free environment. The subgrantee takes full responsibility to ensure that all programs can identify and obtain needed supplies.

Thurston County utilizes a Vulnerability Index Service Prioritization Decision Assistance Tool (VI-SPDAT) for the Coordinated Entry (CE) System for single adults and families. Youth and Young adults are prioritized utilizing a youth specific assessment. The VI-SPDAT takes into consideration much of what places individuals at heightened risk for COVID, such as age, poor health, and other related factors. The CE system was not adjusted by providers in response to COVID, as it already supports placement of those most vulnerable in housing as it becomes available. Please see [Appendix H](#) for the full CE policies and procedures.

Domestic Violence programs in addition must follow the Violence Against Women Act and the Family Violence Prevention and Services Act and amend data entry in HMIS (Homeless Management Information System) to follow proper protocol for those fleeing DV and IPV.

Grantees must respond to the disproportional access to services across different demographic groups; service provision and outcomes cannot simply rely on delivering a standardization of services to address inequity. Grantees have the responsibility to examine their data to ensure all eligible persons receive equitable services, support and are served with dignity, respect, and compassion regardless of circumstance, ability, or identity.

This includes marginalized populations, Black, Indigenous and People of Color (BIPOC), immigrants, people with criminal records, people with disabilities, people with mental health and substance use vulnerabilities, people with limited English proficiency, people who identify as transgender, people who identify as LGBTQ+, and other individuals that may not access mainstream support.

1.3.1 System Coordination

Thurston County Public Health and Social Services (PHSS) is available to conduct free testing for people experiencing homelessness at shelters and at regular testing locations. ESG-CV funded shelters and outreach programs should encourage people experiencing homelessness to get vaccinated. Individuals should be tested if they are actively experiencing COVID symptoms. Service providers should reach out to PHSS to coordinate transportation, and placement into quarantine and isolation for those exposed to the COVID-19 virus, or as determined by local public health order.

ESG-CV funded programs which offer direct service are required to utilize Coordinated Entry (CE). HUD requires CE for all Continuums of Care (CoCs). Providers will coordinate utilizing Coordinated Entry, the approved prioritization tools, and regular case consulting meetings to help streamline placement of participants into projects. As proposed changes are needed, it will be brought to the regional Coordinated Entry, or Name By Name meeting, where policy

modifications can be addressed and implemented.

[The Regional Housing Council \(RHC\)](#), has representatives from Thurston County, the cities of Olympia, Lacey, Tumwater and Yelm and helps to steer regional homelessness policy and actions, with the [5-year homeless crisis response plan](#) as their guide. The RHC through this coordination, and through the support staff technical team, has helped the region prepare, prevent, and respond to COVID-19. The RHC meets monthly, and the RHC technical team currently meets once per week.

1.3.2 Equity Foundation

The Office of Housing and Homeless Prevention within Thurston County's Public Health and Social Services Department have started taking initial steps towards addressing racial disparity in the Thurston County Homeless Crisis Response System. Addressing racial disparity, racism and understanding the ongoing impacts of white supremacy is necessary to equitably prioritize households into shelter and housing projects. This is an ongoing process, that requires centering and amplifying the voices of Black, Indigenous, and People of Color (BIPOC) leaders, stakeholders, and people with lived experience in all aspects of planning and implementation of programs and prioritization practices in a way that does not cause further harm. The following highlights actions taken so far:

- On March 9th, 2021 the Thurston County Board of County Commissioners declared racism a [public health crisis](#).
- Thurston County joined the Government Alliance for Racial Equity (G.A.R.E.)
- The Regional Housing Council (RHC), a group of local representatives and jurisdiction support staff set aside dedicated funds to hire a Diversity, Equity, and Inclusion Consultant to assist the community in moving this conversation forward.
- During the 2021 Request for Proposals (RFP) contract period, for scoring applications, the criterion "support vulnerable and historically disadvantaged populations" increased in point value from 5-20 points. Applicants were evaluated based on whether they are actively engaging in processes aimed to reduce racial disparity in services, and staff.
- The 5-year Homeless Crisis Response Plan has a dedicated action plan towards addressing racism in the Homeless Crisis Response System. Initial strategies identified to address racial disparities were not vetted by BIPOC leaders, stakeholders, and people with lived experience. As an act of reparations, a workgroup is being established specifically by BIPOC individuals to provide feedback, and ideas on improving the plan.
- A workgroup of service providers has developed a new prioritization tool for single adults experiencing homelessness designed to prioritize households entering the homeless crisis response system more equitably.

2 Administrative Requirements of Subgrantees

2.1 Grant Management

2.1.1 Changes to Guidelines

Thurston County will be notified of updates to the Commerce ESG-CV guide, which can happen at any time. Thurston County is responsible for sending revisions to these guidelines to subgrantees in a timely manner.

2.1.2 Thurston County Monitoring

Thurston County will monitor the activities of subgrantees. Thurston County and the Department of Commerce reserve the right to monitor subgrantees at any time, and documents, invoices, and all other supporting materials must be made available upon request.

Thurston County will be responsible for ensuring subgrantee compliance with all requirements identified in these ESG-CV guidelines. Thurston County must conduct a risk assessment and develop a monitoring plan for each subgrantee within six months of contracting ESG-CV to the subgrantee. The risk assessment must inform the monitoring plan for each subgrantee. Monitoring plans must include monitoring dates, the type of monitoring (remote, on-site), and the program requirements being reviewed. Standard notice for monitoring by Thurston County will be 30 days, including a brief overview of what will be included so that agencies may have time to prepare.

Commerce reserves the right to require Thurston County to undertake special reviews of subgrantees when an audit or other emerging issue demands prompt intervention and/or investigation. Thurston County will endeavor to provide as much notice and information to subgrantees if this situation arises.

2.1.3 Youth and Young Adult Requirement

At least 10% of households served with ESG-CV funds must be unaccompanied youth and young adults, through age 24. This is not a requirement for each subgrantee, but an overall requirement for Thurston County.

2.1.4 Subgrantee Requirements

All Thurston County subgrantees must:

- Record all client-related data and activity using the Continuum of Care (CoC) established HMIS.
- Participate actively in Coordinated Entry for those offering direct service.
- Provide services consistent with a Housing First approach.
- Comply with all requirements in their subgrantee contracts, federal requirements outlined in the ESG Interim Rule, HUD ESG-CV Notices and Waivers, and locally established written program standards.

In addition, all subgrantee agreements must be time-limited and have defined roles and responsibilities for each party, detailed budgets, and performance terms. Commerce reserves the right to directly contact subgrantees at any time for data quality, monitoring, fiscal and other issues. Thurston County should be the primary point of contact for all subgrantees for any

programmatic or other ESG-CV related questions.

Thurston County may enter into an agreement with any other local government, Council of Governments, Housing Authority, Community Action Agency, nonprofit community or neighborhood-based organization, federally recognized tribe in the state of Washington, or regional or statewide nonprofit housing assistance organizations who operate programs to end homelessness within a defined service area.

2.2 Fiscal Administration

2.2.1 Budget Caps

ESG-CV Administration: Up to 7 percent (7%) of the ESG-CV contracted budget may be allocated to administrative costs. ESG-CV does not have any match requirements. Other budget caps standard to standard ESG program years have been waived.

2.2.2 Budget Categories

Budget Category	Allowable Expenses (linked to relevant sections of the Guidelines)
Admin	Administrative
HMIS	HMIS
Street Outreach	Street Outreach
Shelter Case Management	Emergency Shelter Eligible Activities – Case Management
Shelter Operations	Emergency Shelter Eligible Activities – Operations
Temporary Emergency Shelter	Temporary Emergency Shelter Eligible Activities
Rapid Re-housing Case Management	Case Management Eligible Activities for Rapid Re-housing
Rapid Re-housing Rental Assistance	Rental Assistance Eligible Activities for Rapid Re-housing
Rapid Re-housing Other Financial Assistance	Other Financial Assistance for Rapid Re-housing
Prevention Case Management	Case Management Eligible Activities for Prevention
Prevention Rental Assistance	Rental Assistance Eligible Activities for Prevention
Prevention Other Financial Assistance	Other Financial Assistance for Prevention

Case Management is classified as an activity under Essential Services in 24 CFR §576 Subpart B.

2.2.3 Reimbursements

Subgrantees must request payment from Thurston County using the invoicing process outlined

here and in the contract agreements, once their ESG-CV contract is in place. Subgrantees requesting reimbursement must adhere to the following: submit program reimbursement requests and supporting documentation by the 10th of each month for the previous month. Failure to submit timely requests for reimbursement can result in reallocations, reductions in awards, or loss of future program funding. Backup documentation can be reports from the agency accounting system that clearly identify the expenditures that are being requested for reimbursement or copies of receipts in the absence of accounting system reports. In either case, back-up documentation should fully substantiate the reimbursement request. Individual technical assistance will be provided for all new grantees.

After review and submission of payment documentation, subgrantees will be notified of any deficiencies and/or disallowed costs. Thurston County is committed to timely reimbursement of subgrantees. Once all supporting documentation, and a complete invoice has been submitted (to housingthurston@co.thurston.wa.us), Thurston County will reimburse subgrantees within 30 days.

Thurston County will retain original invoices submitted by any subgrantees.

2.2.4 Budget Revisions

Revision requests must be submitted in writing to the Thurston County Office of Housing and Homeless Prevention Program Manager, Thomas Webster. Requests will be approved or denied, with explanation and follow-up within 30 days from the initial request.

2.2.5 Spending Timeline Requirements

Thurston County will monitor grant spending to ensure that grantees are on track to spend out funds. If grantees are not spending down in a timely manner, funds may be recaptured.

All ESG-CV funds (both first and second allocations) must be expended by **September 30, 2023**. Additionally, grantees must meet ESG-CV spending milestones by the following deadlines:

- **September 30, 2021:** At least 20% of total award must be expended.
- **March 31, 2022:** At least 80% of total award must be expended.
- **September 30, 2023:** All funds must be expended.

3 Intervention Strategies

Grant funds must be used for eligible activities that prevent, prepare for, and respond to the coronavirus as outlined below. The ESG-Program Interim Rule applies except for the waivers and additional eligible activities established in the CARES Act and in [Notice: CPD-20-08](#) (ESG-CV Notice), [Notice: CPD-21-05](#), and [Notice: CPD-21-08](#). These alternative requirements and flexibilities are also applicable to annual ESG funding when those funds are used to prevent, prepare for, and respond to coronavirus.

Funded activities must be tied to the community response to COVID-19. Agencies do not use health status to discriminate access to programs. Training is provided to all staff on how to prevent, prepare and respond to COVID-19.

3.1 Street Outreach

Street Outreach meets the immediate needs of households experiencing unsheltered homelessness by connecting them with emergency shelter, housing, and/or critical health services.

ESG-CV funds may be used for costs of providing essential services necessary to reach out to unsheltered homeless households and connect them with emergency shelter, housing, or critical services. For the purposes of this section, the term “unsheltered homeless” means individuals and families who qualify as homeless under paragraph (1)(i) of the “homeless” definition under [24 CFR §576.2](#): An individual or family with a primary nighttime residence that is a public or private place not designed for or ordinarily used as a regular sleeping accommodation for human beings, including a car, park, abandoned building, bus or train station, airport, or camping ground.

Street Outreach activities funded with ESG-CV must be consistent with CDC guidance related to [street outreach](#) and engaging [people at increased risk](#) of severe illness when contracting coronavirus, as well as established best practices in coordination with Thurston County Public Health and Social Services (PHSS). This includes screening clients for symptoms by asking them if they feel as if they have a fever, cough, or other symptoms consistent with COVID-19; Train outreach staff on how to protect themselves from COVID-19; physical barriers such as a sneeze guard or a large table are used to protect staff who have interactions with persons with unknown infection status; Provide masks to clients who do not have one or are not wearing one; and identify and address potential language, cultural, and disability barriers associated with communicating COVID-19 information to workers, volunteers, and those you serve.

ESG-CV funded outreach programs should encourage (but may not require) people experiencing homelessness to get tested if they are experiencing COVID-19 symptoms. Outreach programs should also encourage individuals to get a COVID-19 vaccination, and boosters as made available.

ESG-CV funding for street outreach to respond to COVID-19 may include providing masks, hand sanitizer, and soap to households experiencing unsheltered homelessness; outfitting staff with personal protective equipment; coordinating medical care and other support services; providing transportation for program participants to travel to and from medical care, and other needed services; hazard pay; and providing reasonable incentives to volunteers (e.g. cash or gift cards) who are helping to provide necessary services during the coronavirus outbreak.

In Thurston County

Due to the lowered capacity of emergency shelters, and the closures of businesses and service centers in the community, it was determined supporting individuals to safely stay in their encampments was an effective strategy to help prevent the spread of COVID. Shelter in place activities funded include survival supplies, such as: cold weather gear, camping and outdoor equipment, food, hygiene, clothing, water, basic medical supplies, hand sanitizer and face masks. Shelter in place outreach also includes participant driven case management, and connection to Coordinated Entry, and other regional services.

Weekly coordination of outreach providers through the Greater Regional Outreach Workers League (GROWL), allows for discussion of encampments and other unsheltered areas, and the types of support being provided to help coordinate and ensure no individuals are missed. They also discuss community actions, and information sharing. As a part of the COVID-19 response, information on testing, vaccines, service provision, access to hygiene, shelter, and other basic services can be shared out frequently via newsletter.

Outreach strategies have been adapted to improve safety with the COVID-19 pandemic, and over time as experience led to better understanding. Outreach kits are pre-made, with all needed items so that they could be distributed without any potential cross contamination. Proving to be a drain on resources, this was shifted to an assembly line model in the camps, which also enables outreach teams to specialize what each person is receiving. All outreach staff wore N95 masks and encouraged participants to mask and maintain physical distancing. Temporary employees have been employed to expand outreach teams.

Case management and support for various encampments is provided in and around the Olympia area. By engaging with participants and encouraging best practices for COVID safety, such as masking, hygiene, and physical distancing. ESG-CV funding has helped make this project possible, increasing the scope and scale of case management in encampments in Thurston County.

During the declared state of emergency from the COVID-19 pandemic, personal protective equipment, including hand sanitizer and cleaning solution was available through [Thurston County Emergency Management](#). Homeless service providers were encouraged to reach out to place an order. Projects funded with ESG-CV coordinate care for individuals who are sick and experiencing homelessness. This includes activities such as arranging transportation for individuals who are sick and/or securing an appropriate, safe location where people can stay during the illness. During quarantine, clients are provided with essentials: food, laundry, clothing, and prescriptions (as needed) as well as case management to determine and direct clients to needed services. Established relationships and referral processes with local agencies help us to provide quick access to needed care for those experiencing homelessness.

The Homeless Crisis Response Coordinator organizes directly with outreach providers and medical agencies to create a rotating, consistent vaccine efforts in Thurston County's largest encampments. Mobile vaccine clinics began three-week rotations, involving well-known outreach providers, volunteer medical providers. Along with offering J&J vaccines, medical

providers offered much needed wound-care to camp residents. The efforts are ongoing and have been met with great success in assuring unsheltered people have accessible outreach and medical support.

Outreach strategies in response to COVID-19 support all populations that are living unsheltered. Resources and referrals through the different service providers, and Coordinated Entry are specialized to each population: youth and young adults, single adults, families, and those fleeing DV or IPV. YYA are supported through making accessible direct support services and access to referrals and case management while they shelter in place, as well as referrals in coordination with Community Youth Services to access the Day Shelter and youth and young adult overnight emergency shelter – Rosie’s Place. Single Adults are supported by access to increased shelter in place and survival gear, as well as access to hygiene, and food distribution in the encampments. Transportation to hygiene and medical appointments has also been made possible through targeted funding and outreach. Families are similarly supported with referrals to dedicated shelter space at Pear Blossom Place with Family Support Center, case management, and access to survival and hygiene supplies. All populations are supported through close coordination with Thurston County PHSS, access to testing events, and safe placement in quarantine and isolation for anyone without an alternate place to go.

3.1.1 Handwashing Stations and Portable Bathrooms

ESG-CV funds may be used for costs of providing urgent, non-facility-based care to unsheltered households who are unwilling or unable to access emergency shelter, housing, or an appropriate health facility. To this end, funds may be used for portable hygiene services and the staffing, equipment, supplies and services to clean and maintain these facilities to support households experiencing unsheltered homelessness. Examples include handwashing stations and bathrooms (e.g., porta potties) and shower trucks with soap and shampoo, and laundry services including mobile laundry trucks.

In Thurston County

OHHP has worked in partnership with the City of Olympia to fund porta potties and handwash stations throughout Olympia, and into surrounding areas and encampments. This is in addition to increased coordinated support for those in encampments to ensure access to hygiene, and better access to case management.

3.1.2 Street Outreach Maintenance of Effort Requirement

ESG-CV funds cannot be used to replace the local government funds for street outreach and emergency shelter services during the immediately preceding 12-month period, unless HUD determines that the unit of general purpose local government is in a severe financial deficit ([24 CFR 576.101\(c\)](#)).

3.2 Emergency Shelter & Temporary Emergency Shelter

Emergency shelter operations and services to households residing in emergency shelter are allowable activities. Households are eligible for emergency shelter assistance if they are unsheltered or residing in a temporary housing program.

ESG-CV funds may be used to pay for temporary emergency shelters for individuals and families experiencing homelessness. Eligible costs include leasing, operations, and services. Temporary Emergency Shelter is an allowed expense but is not receiving ESG-CV funding in Thurston County.

Emergency shelter activities funded with ESG-CV should be in alignment with recommended guidance to [effectively manage infectious disease within the shelter](#) during coronavirus. ESG-CV funding for emergency shelter to respond to COVID-19 may include providing cleaning supplies; personal protective equipment for staff and program participants; portable hygiene services; volunteer incentives; hazard pay; furnishings such as room dividers and cots; and costs associated with providing transportation for program participants to travel to and from medical care, and other needed services.

If no appropriate emergency shelter is available, grantees may use ESG or ESG-CV funds to provide unsheltered homeless individuals with hotel/motel vouchers. Hotel/motel vouchers may be provided if shelter beds are available, but it is not safe for them to use because of the need for social distancing. Eligible costs include:

- A hotel or motel room directly or through a hotel or motel voucher
- Cleaning of hotel or motel rooms used by program participants
- Repairs for damage caused by program participants above normal wear and tear of the room

The purpose of ESG-CV funds is to prevent, prepare for, and respond to COVID-19 to prevent and mitigate the spread of COVID-19 among people experiencing homelessness and the staff that provide services to these individuals. This requires that existing shelters implement public health protocols such as enforcing social distancing, establishing an isolation space (especially for residents suspected of having COVID-19, those with confirmed cases, and high-risk residents such as elderly people and people with pre-existing health conditions), using personal protective equipment (PPE), and cleaning/disinfecting shared living spaces. If existing shelter is not available or where current shelters are not able to implement these safety protocols, additional space may need to be identified to allow people to have shelter. This may be space within an existing shelter (e.g., an office not being used) that could be temporarily converted into a quarantine space for someone who has tested positive or is awaiting test results, or it could be an entirely separate building, or hotel/motel.

No household shall be denied access to safe housing, which may include alternative housing or a hotel room, even if they have been exposed or are symptomatic with coronavirus. Health-related questions should not determine admission or access to programs, and should not be

asked to screen people out of shelter. Someone who presents at an ESG or ESG-CV funded shelter with respiratory symptoms (e.g., cough) should not be turned away solely because of their health symptoms. Additionally, shelters cannot require participants to receive the COVID-19 vaccination to receive services. It is encouraged for shelters and service providers to work in coordination with Thurston County Public Health and Social Services to utilize the county quarantine and isolation facility, for placement of those positive, or with known exposure to safely quarantine and isolate.

Shelters funded by ESG-CV may not turn away eligible program participants and should establish referral pathways to other shelter or housing if the shelter is at maximum capacity. Shelters must establish referral pathways to isolation and quarantine if a client needs such services. Shelters funded by ESG-CV are strongly discouraged from implementing a maximum length of stay when a discharge will result in program participants returning to unsheltered settings or situations putting them at a higher risk of COVID-19 infection.

In Thurston County

In Thurston County there was a loss of shelter beds to accommodate the recommended minimum of 6' of physical distancing. Additional physical shelter space was not available to implement safety protocols, so hotel/motel rooms were identified to allow people to have shelter while staying as healthy as possible. Room rates were negotiated with representatives of the hotels/motels and are reasonable in cost as compared to other hotels/motels in the area. Other temporary emergency shelter options such as churches, offices and public spaces were explored but are not available. Subgrantees adopted individual policies around prioritization of their participants into hotel/motel versus those staying in shelter.

Emergency Shelter strategies in response to COVID-19 support YYA through making accessible and supporting a Day Shelter, where they can access case management, health services, hygiene, and support with mail and other logistics of program participation while following COVID-19 safety protocols. Also funded is shelter specifically targeted towards youth and young adults.

Single Adults are supported by access to increased non-congregate settings through hotel/motel vouchers, which also helps shelters follow CDC guidelines to help prevent COVID-19. Families are similarly supported with dedicated shelter space. Funding for families also includes placement in hotel/motels for a total of 70 shelter beds, and strong case management for placement into housing projects. Shelter space was filled first, to the safe COVID capacity, with other participants overflowed into hotels. All populations are supported through close coordination with Thurston County PHSS, access to testing events in the community and in place at shelters, and safe placement in quarantine and isolation for anyone without an alternate place to go.

Emergency shelters worked in close coordination through the Hazardous Weather Task Force, a weekly meeting at the start of COVID, to help prepare for and respond to the pandemic. Best

practices were shared, and services were coordinated to help support the unsheltered population, those staying in and outside of shelter. Included in that meeting was Intercity Transit, the major local transit provider, as well as outreach and other direct service organizations. Through this meeting agencies were connected with Thurston County Emergency Management, as well as with the county Public Health Officer, and other regional jurisdiction representatives and technical support staff. The information on free testing and quarantine and isolation was widely distributed, it was an option on the Thurston County Housing Line (24/7) for those seeking shelter, and available on the county's website.

At the start of the pandemic, providers were learning best practices, and implemented as guidance was issued.

- Shelter staff monitors residents daily for symptoms of COVID-19 and other illness. Individuals were screened coming into shelter, and referral to testing, or hotel/motel was encouraged for those showing symptoms. Shelter staff were similarly screened and encouraged to not work if symptomatic.
- Cleaning protocols increased, and hand washing, and additional hygiene was strongly encouraged.
- Shelter spaces were modified to accommodate 6' of distancing. Barriers, and other guards were erected between beds as agencies were able.
- Shelter staff regularly reviews with resident's alternative housing options that would provide greater safety from COVID-19 exposure. The limits of funding were continually explored to try to find the best solution for the largest number of people.
- Shelter staff educate guests on the need for masks and other Personal Protective Equipment (PPE). Adoption was often not required, but strongly encouraged. Adoption of masking was noted to be slow.
- Vaccination requirements for staff were implemented, and incentives offered to participants.

Those fleeing Domestic and Inter-partner violence are supported by ESG-CV funds through additional targeted support for SafePlace, the Thurston County designated DV service provider. Additional funding has been directed towards hotel/motel vouchers to make shelter readily accessible, as well as additional funding for Rapid Re-housing.

3.2.1 Emergency Shelter Policies

3.2.2.1 Prohibition against involuntary family separation

The age of a child under age 18 must not be used as a basis for denying any family's admission to an emergency shelter that uses ESG-CV funding or services and provides shelter to families with children under age 18.

3.2.2.2 Maintenance of Effort Requirement

If the grantee or subgrantee is a unit of general-purpose local government, ESG-CV funds cannot be used to replace funds the local government provided for street outreach and emergency shelter essential services during the immediately preceding 12-month period, unless HUD determines that the unit of general purpose local government is in a severe financial deficit. ([24 CFR 576.102\(d\)](#)). The maintenance of effort requirements do not apply to shelter operation costs.

3.3 Rapid Re-Housing and Prevention Assistance

Rapid Re-Housing and Homelessness Prevention Assistance includes rent assistance and housing relocation and stabilization services for households experiencing homelessness and households at-risk of homelessness based on the household's housing status at the time of program entry.

Rapid Re-Housing assistance is available for persons who are literally homeless according to HUD's definition in [Household Eligibility](#).

Homelessness Prevention assistance is available for persons who are at imminent risk of homelessness or at-risk of homelessness according to HUD's definition in [Household Eligibility](#).

Per [ESG-CV Notice](#) issued April 14, 2021, in addition to individuals and families who meet the existing requirements in 24 CFR 576.104, Rapid Re-Housing assistance may also include individuals and families who meet ALL of the following criteria:

- a. Qualified as "homeless" as defined in 24 CFR 576.2 immediately before moving into their current housing;
- b. Have been residing in housing with time-limited rental assistance provided under a homeless assistance program (which means assistance limited to or reserved, either federally or locally, for people who are "homeless" as defined in 24 CFR 576.2);
- c. Would not have any overlap in rental assistance between the non-ESG-CV program and the ESG-CV program, due to exhaustion or expiration of the non- ESG-CV assistance or program funds;
- d. Would not have a gap of more than one month (or equivalent number of days) between the end of the non-ESG-CV rental assistance and the beginning of their ESG-CV Rapid Re-Housing rental assistance; and
- e. Do not have the resources or support networks (beyond an eviction moratorium) (e.g., family, friends, or other social networks) needed to retain their existing housing without ESG-CV assistance.

Prioritization for RRH is based on households who meet HUD's Category 1 and 4 criteria for homelessness and is prioritized by: 1) households with the longest history of homelessness; and 2) households with the most severe service needs including Covid-19 related needs. No additional eligibility requirements (e.g., cannot require income, employment, sobriety, etc.) will be considered. The individual or household is provided with rapid access to permanent housing

with minimal preconditions that could serve as barriers. For example: good credit or good rental history cannot be required screening criteria. Under the CARES Act, ESG-CV funding, there will be no rental payment requirement for households receiving financial assistance. Projects are expected to serve people with zero income.

ESG-CV funds may be used to provide housing relocation and stabilization services and short and/or medium-term rental assistance necessary to prevent a household from moving into an emergency shelter or another place described in paragraph (1) of the “homeless” definition in 24 CFR 576.2. Homelessness Prevention costs are only eligible to the extent that the assistance is necessary to help the program participant regain stability in the program participant’s current permanent housing or move into other permanent housing and achieve stability in that housing.

Prioritization for Homelessness Prevention are households earning less than 50% of AMI who are determined to have no alternative resources and no other place to go.

The costs of homelessness prevention are only eligible to the extent that the assistance is necessary to help the program participant regain stability in the program participant’s current permanent housing or move into other permanent housing and achieve stability in that housing. Homelessness prevention must be provided in accordance with the housing relocation and stabilization services requirements in [24 CFR 576.105](#), the short-term and medium-term rental assistance requirements in [24 CFR 576.106](#), and the written standards and procedures established under [24 CFR 576.400](#).

When assessing use of funds, the following document from the National Alliance to End Homelessness may be helpful: [Use ESG-CV to Help Those Currently Experiencing Homelessness First](#).

Households being evicted for non-payment of rent during a state and/or federal eviction moratorium may be eligible to receive homelessness prevention services if: a) the agency has attempted to contact the landlord/owner at least two times over email or phone to notify them of the eviction moratorium and no response has been received within 5 business days; b) referral to legal aid has not resolved the issue.

In Thurston County

Rapid Re-Housing and Homeless Prevention were prioritized projects utilizing ESG-CV funding. With this increase in funding Thurston County has expanded access to RRH assistance for those eligible. With these ESG-CV funds in coordination with State and Federal rental assistance programs, and other grant sources, the community has had a robust ability to help individuals impacted by COVID-19. The main sub-grantees involved have MOU’s (memorandum of understanding), with various by and for agencies, to help assure equitable access to these funds.

Thurston County's designated DV shelter is serving both Rapid Re-Housing and Homeless Prevention clients with ESG-CV funding. These funds have greatly expanded the ability to quickly serve clients and has expanded the population that they can serve. Thurston County is currently subsidizing rentals up to 100%, with a maximum timeframe of 3 years. Utility assistance is not capped and covers the client's portion of the bill. Eligibility for these programs, and the amounts of assistance provided, all follow ESG-CV guidelines. Both RRH programs prioritize those at or below 50% Area Medium Income (AMI), and who have experienced homelessness the longest. Subgrantees are active members of the CE team, helping to coordinate referrals and placement into housing.

Sexual Assault and Domestic Violence services including housing services, are delivered utilizing a trauma informed approach. Services are delivered with the understanding of the vulnerabilities and experiences of domestic violence and sexual assault survivors, including the prevalence and physical, social and emotional impacts of trauma. A trauma informed approach recognizes signs of trauma in staff, clients and others and responds by integrating knowledge about trauma into policies, procedures, training, practices, and settings.

Rapid Re-Housing and Homelessness Prevention strategies in response to COVID-19 support YYA through increased funding and program availability. Single Adults are supported by access to increased funding for RRH, which includes specific additional funding to SafePlace for those fleeing/attempting to flee domestic violence. Families are supported by additional funding in this program area, with the increased availability and access to RRH and HP in the community. All populations are supported through close coordination with Thurston County PHSS, access to testing events, shelters, and safe placement in quarantine and isolation for anyone without an alternate place to go.

3.3.1 Landlord Incentives

ESG-CV may be used to pay for landlord incentives that are reasonable and necessary to assist households in obtaining housing. Grantees may not use ESG-CV funds to pay the landlord incentives an amount that exceeds three times the rent charged for the unit. Landlord incentives can include:

- Signing bonuses up to 2 months of rent
- Security deposits equal to up to three months of rent, or the state statute
- Costs to repair damages incurred by the program participant not covered by the security deposit or that are incurred while the program participant is still residing in the unit
- Paying the cost of extra cleaning or maintenance of a program participant's unit or appliance.

Landlord incentives may be charged under Rapid Re-Housing and Homelessness Prevention budget categories.

Grantees must maintain program records that document that program costs are reasonable.

Landlord Incentives are currently being funded in Thurston County in the form of deposits.

3.4 Additional Allowable Activities

3.4.1 Training

ESG-CV funds may be used to train staff on infectious disease prevention and mitigation for staff working directly to prevent, prepare for, and respond to coronavirus among households who are homeless or at-risk of homelessness. The costs are eligible as a standalone activity, not as an administrative cost, and do not need to be tied to a specific intervention.

Training costs are allowable under all ESG components and can be provided to both homelessness assistance providers and to those who do not receive funding through the CARES Act.

Subgrantees must maintain meeting agendas and notes to support eligibility of this expense.

Thurston County has funded training for its homeless service providers.

3.4.2 Hazard Pay

ESG-CV funds may be used to pay hazard pay for grantee staff who work directly to prevent, prepare for, and respond to coronavirus among households who are homeless or at-risk of homelessness.

Examples of staff working directly in support of coronavirus response include:

- Street outreach teams
- Emergency Shelter staff
- Staff providing essential services (e.g., outpatient health or mental health, housing navigators)
- Staff in proximity to persons with coronavirus or working in locations with a high likelihood of contracting coronavirus

Hazard pay may be billed under Homelessness Prevention, Rapid Re-Housing, Emergency Shelter, and Street Outreach program components. While subgrantees have the authority to establish their own hazard pay amounts and their cap, all subgrantees should ensure the following criteria are met:

- They are provided under the organization's established written [compensation policies](#)
- The costs are equitably allocated to all related activities including Federal awards; and subgrantees must maintain records that include job descriptions, policies and procedures or other program records that detail positions receiving hazard pay.

Hazard pay is funded in Thurston County.

3.4.3 Volunteer Incentives

ESG-CV may be used to provide reasonable incentives (e.g., cash or gift cards) to volunteers who help to provide necessary street outreach, emergency shelter, essential services, and housing relocation and stabilization services during the coronavirus outbreak.

Volunteer incentives may be billed under Homelessness Prevention, Rapid Re-Housing, Emergency Shelter, or Street Outreach.

Program records should document that costs are reasonable.

In Thurston County most agencies ceased utilizing volunteers in response to COVID; currently no volunteer incentives are being funded.

3.4.3 Vaccine Incentives

Vaccine incentives are an eligible expense, but are not funded through ESG-CV funds in Thurston County.

4 Rental Assistance Requirements of Subgrantees

4.1 Washington Residential Landlord-Tenant Act

Subgrantees must provide information on the Washington Residential Landlord Tenant Act ([RCW 59.18](#)) to households receiving rent assistance.

For more information on this law, visit Washington Law Help, housing page, tenant rights at <http://www.washingtonlawhelp.com/>.

4.2 Rental Assistance Agreement

Rent assistance agreements are required between the subgrantee and the property owner to provide rent assistance. The agreement must set forth the terms under which rental assistance will be provided, including the requirements that apply under [24 CFR §576.106 \(e\)](#). The rental assistance agreement must contain language stating that, during the term of the agreement, the landlord must give lead/sub grantee a copy of any notice to the program participant to vacate the housing unit, or any complaint used under state or local law to commence an eviction action against the program participant.

Subgrantees must make timely payments in accordance with the rental assistance agreement. The rental assistance agreement must contain the same payment due date, grace period, and late payment penalty requirements as the program participant's lease. The subgrantee is solely responsible for paying late payment penalties that it incurs with non ESG-CV funds.

4.3 Lease

Households who are receiving rental assistance must have a legally binding, written lease between the owner and the program participant for the rental unit, unless the assistance is

solely for rental arrears. When the assistance is solely for rental arrears, an oral agreement may be accepted in place of a written lease, if the agreement gives the program participant an enforceable leasehold interest under state law and the agreement and rent owed are sufficiently documented by the landlord's financial records, rent ledgers, or canceled checks. For program participants living in housing with project-based rental assistance (described below) the lease must have an initial term of one year.

4.4 Tenant-based Rental Assistance

A program participant who receives tenant-based rental assistance may select a housing unit in which to live and may move to another unit or building and continue to receive rental assistance, as long as the program participant continues to meet the program requirements. The rental assistance agreement must be terminated if the program participant moves out of the housing unit for which the program participant has a lease; the lease terminates and is not renewed; or the program participant becomes ineligible to receive ESG-CV rental assistance.

4.5 Project-based Rental Assistance

If the ESG-CV funded provider identifies a permanent housing unit that meets ESG-CV requirements and becomes available before a program participant is identified to lease the unit, the provider may enter into a rental assistance agreement with the owner to reserve the unit and subsidize its rent in accordance with the following requirements:

1. The rental assistance agreement may cover one or more permanent housing units in the same building. Each unit covered by the rental assistance agreement ("assisted unit") may only be occupied by program participants, except as provided under paragraph (4) of this section.
2. The subgrantee may pay up to 100 percent (100%) of the first month's rent, provided that a program participant signs a lease and moves into the unit before the end of the month for which the first month's rent is paid. The rent paid before a program participant moves into the unit must not exceed the rent to be charged under the program participant's lease and must be included when determining that program participant's total rental assistance.
3. The subgrantee may make monthly rental assistance payments only for each whole or partial month an assisted unit is leased to a program participant. When a program participant moves out of an assisted unit, the grantee may pay the next month's rent, i.e., the first month's rent for a new program participant, as provided in paragraph (2) of this section.
4. The program participant's lease must not condition the term of occupancy to the provision of rental assistance payments. If the program participant is determined ineligible or reaches the maximum number of months over which rental assistance can be provided, the grantee must suspend or terminate the rental assistance payments for the unit. If the payments are suspended, the individual or family may remain in the assisted unit as permitted under the lease, and the grantee may resume payments if the individual or family again becomes eligible and needs further rental assistance. If the

payments are terminated, the rental assistance may be transferred to another available unit in the same building, provided that the other unit meets all ESG-CV requirements.

5. The rental assistance agreement must have an initial term of one year. When a new program participant moves into an assisted unit, the term of the rental assistance agreement may be extended to cover the initial term of the program participant's lease. If the program participant's lease is renewed, the rental assistance agreement may be renewed or extended, as needed, up to the maximum number of months for which the program participant remains eligible. However, under no circumstances may the grantee commit ESG-CV funds to be expended beyond the expenditure deadline or commit funds for a future ESG-CV grant before the grant is awarded.

4.6 Sponsor-Based Rental Assistance

Sponsor-Based Rental Assistance (SBRA) may be funded as an alternative to tenant-based and project based rental assistance when necessary to re-house RRH and HP program participants quickly in permanent housing.

Subrecipients must execute a Sponsor-Based Rental Assistance agreement with a separate “sponsor” (e.g., government agency, instrumentality, or nonprofit organization) to subsidize the rent of program participants who are referred to units owned or leased by the sponsor.

The rental assistance agreement may cover one or more permanent housing units owned or leased by the sponsor.

Please note that under no circumstance may the subrecipient execute a sponsor-based rental assistance agreement with itself or its parent or subsidiary organization. For more information about the requirements of sponsor-based rental assistance, please review HUD Notice [CPD-21-08](#) (see section III.E.3.o).

4.7 Conflicts of Interest

The payment of any type or amount of ESG-CV assistance may not be conditioned on a household’s acceptance or occupancy of housing owned by the ESG-CV funded provider or a parent or subsidiary of the provider. No ESG-CV grantee may, with respect to households occupying housing owned by the grantee, or any parent or subsidiary of the grantee, carry out the initial consultation and eligibility determination or administer homelessness prevention assistance.

4.8 Rent Limit and Duration

Subgrantees must use a rent limit policy that is used consistently for all units receiving a rent subsidy, including arrears, and must be completed before the rent subsidy is paid. The rent limit is the maximum rent subsidy that can be paid for a unit of a given size.

Subgrantees are encouraged to extend/adjust the rent limit to address unemployment, loss of income, or benefits due to coronavirus.

4.9 Determining Rent Subsidy

Subgrantees must have a standardized procedure for determining the amount of rent subsidy for each household. 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.

Client files must include documentation of the subsidy amount and the determination process. Rent subsidy should be adjusted when there is a change in household circumstance, income, or need.

If utilities are not included in the rent but are the responsibility of the resident, a utility allowance for reasonable rent utility consumption must be subtracted from the rent. Subgrantees must use their local Public Housing Authority's (PHA) schedule of utility allowances per [CPD Notice 17-11](#).

If the cost of utilities is less than the permitted monthly rental amount, the amount of rent must be reduced by the cost of utilities.

4.10 Fair Market Rent (FMR)

The Fair Market Rent (FMR) requirement is waived for ESG-CV if the rent complies with HUD standards of rent reasonableness.

4.11 Rent Reasonableness

Subgrantees must establish their own written policies and procedures for documenting comparable rents to establish transparency and consistency across all projects. Written policies and procedures should include:

- A methodology for documenting comparable rents
- Case file checklists and forms
- Standards for certifying comparable rents as reasonable
- Determination must be supported by documentation in the case file

The rental assistance paid cannot exceed the actual rental cost, which must be in compliance with HUD's standard of rent reasonableness.

- Rent reasonableness means that the total rent charged for a unit must be reasonable in relation to the rents being charged during the same time period for comparable units in the private unassisted market and must not be in excess of rents being charged by the owner during the same time period for comparable non-luxury unassisted units.
- Although the ESG-CV notice waives the requirement that unit rent must not exceed Fair Market Rent (FMR)(24 CFR 576.106(d)(1)), agency staff must determine and document whether each rental unit meets rent reasonableness standards in accordance with 24 CFR 982.507. Comparable rents are evaluated using a market study of rents charged for units of different sizes in different locations. Rental housing data sources used are

property management companies and websites of rental listings such as Zillow, Hotpads and Apartments.com. For more information, see HUD's worksheet on rent reasonableness at: <https://www.hudexchange.info/resource/2098/home-rent-reasonableness-checklist-and-certification/>

- A grantee must determine, and document rent reasonableness for all units for which ESG rental assistance (including arrears) and/or security deposit assistance is being provided. The requirement applies whether homelessness prevention assistance or rapid re-housing assistance is provided.

4.12 Notification Requirements under VAWA

As provided under [24 CFR 5.2005\(a\)](#) each grantee that administers ESG-CV rental assistance is responsible for ensuring that the notice and certification form described under [24 CFR 5.2005\(a\)\(1\)](#) is provided to each applicant for ESG-CV rental assistance and to each program participant receiving ESG rental assistance. The notice and certification form must be provided each time the household:

- is denied rental assistance
- begins receiving rental assistance
- is notified that the rental assistance will be terminated
- receives notification of eviction

When tenant based rental assistance is provided, specifying how the Notice of Rights and certification form is communicated must be included in rental assistance agreements.

4.13 Emergency Transfer Plan

Grantees must develop an Emergency Transfer Plan under [24 CFR 5.2005\(e\)](#). Once the applicable plan is developed in accordance with this section, grantees must implement the plan in accordance with [24 CFR 5.2005\(e\)](#).

Each Emergency Transfer Plan must meet the requirements in [24 CFR 5.2005\(e\)](#) and must specify what will happen with respect to the non-transferring family member(s) who are staying in the unit.

For the purposes of this part, the following requirements shall apply in place of the requirements at [24 CFR 5.2009\(b\)](#):

- When a family receiving tenant-based rental assistance separates under [24 CFR 5.2009\(a\)](#), the family's tenant-based Rental Assistance and Utility Assistance, if any, shall continue for the family member(s) who are not evicted or removed.

HUD has published a model of an Emergency Transfer Plan for communities to use: [HUD 5381 Model Emergency Transfer Plan](#).

4.14 Housing Stability Case Management

Program participants receiving homelessness prevention or rapid re-housing assistance

should be provided housing stability case management as is safe and feasible. Housing case management cannot be a requirement for assistance, but grantees should make housing stability and other appropriate services available and accessible.

5 Household Eligibility

Component	Eligibility Requirements
Street Outreach	<ul style="list-style-type: none"> Category 1 – Literally Homeless Category 4 – Fleeing/Attempting to Flee Domestic Violence (where the individual or family also meets the criteria for Category 1) <p>AND</p> <p>Individuals and families must be living on the streets (or other places not meant for human habitation) and be unwilling or unable to access services in emergency shelter</p>
Emergency Shelter	<ul style="list-style-type: none"> Category 1 – Literally Homeless Category 2 – Imminent Risk of Homelessness Category 3 – Homeless Under Other Federal Statutes Category 4 – Fleeing/Attempting to Flee Domestic Violence
Rapid Re-Housing	<ul style="list-style-type: none"> Category 1 – Literally Homeless Category 4 – Fleeing/Attempting to Flee Domestic Violence (where the individual or family also meets the criteria for Category 1) Individuals and Families who were homeless as in 24 CFR 576.2 immediately before moving into their current housing and who are on time limited rent assistance that will expire within 30 days. (See Section 3.3 for details on eligibility)
Homelessness Prevention	<ul style="list-style-type: none"> Category 2 – Imminent Risk of Homelessness Category 3 – Homeless Under Other Federal Statutes Category 4 – Fleeing/Attempting to Flee Domestic Violence <p>AND</p> <ul style="list-style-type: none"> Individuals and Families who are defined as At-Risk of Homelessness <p>Homelessness Prevention projects have the following additional limitations on eligibility with homeless and at-risk of homelessness:</p> <p>Must only serve individuals and families that have an annual income <u>at or below</u> 50% Area Median Income</p>

HUD definition of Homeless (Category 1):

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

- An individual or family with a primary nighttime residence that is a public or private

place not designed for or ordinarily used as a regular sleeping accommodation for human beings, including a car, park, abandoned building, bus or train station, airport, or camping ground; **OR**

- ii. An individual or family living in a supervised 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](#), or local government programs for low-income individuals); **OR**
- iii. An individual who is exiting an institution where he or she resided for 120 days or less and who resided in an [emergency shelter](#) or place not meant for human habitation immediately before entering that institution;

HUD definition of At Imminent Risk of Homelessness (Category 2):

Individual or family who will imminently lose their primary nighttime residence, provided that:

- i. Residence will be lost within 14 days of the date of application for homeless assistance;
- ii. No subsequent residence has been identified; **AND**
- iii. The individual or family lacks the resources or support networks needed to obtain other permanent housing.

HUD definition of Homelessness under other Federal statutes (Category 3):

Unaccompanied youth under 25 years of age, or families with children and youth, who do not otherwise qualify as homeless under this definition, but who:

- i. Are defined as homeless under the other listed federal statutes;
- ii. Have not had a lease, ownership interest, or occupancy agreement in permanent housing during the 60 days prior to the homeless assistance application;
- iii. Have experienced persistent instability as measured by two moves or more during in the preceding 60 days; **AND**
- iv. Can be expected to continue in such status for an extended period due to special needs or barriers.

HUD definition of Homelessness under other Federal statutes (Category 4):

Any individual or family who:

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

At-Risk of Homelessness is defined as households who:

- 1. have annual incomes below 50% AMI; **AND**
- 2. do not have sufficient resources or support networks immediately available to obtain permanent housing and prevent literal homelessness; **AND**
- 3. meet at least one of the following seven conditions:
 - (i) moved 2 or more times due to economic reasons in 60 days prior to application for assistance
 - (ii) living in the home of another due to economic hardship
 - (iii) losing housing within 21 days after application date

- (iv) living in a hotel/motel not paid for by charitable organizations or federal/state/local government programs
- (v) living in severely overcrowded unit as defined by the U.S. Census Bureau (*single-room occupancy or efficiency apartment unit in which more than two persons, on average, reside or another type of housing in which there reside more than 1.5 persons per room*)
- (vi) exiting publicly funded institution or system of care.
- (vii) a child or youth who qualifies as homeless under section 725(2) of the McKinney-Vento Homeless Assistance Act ([42 U.S.C. 11434a\(2\)](#)), and the parent(s) or guardian(s) of that child or youth if living with her or him

The minimum eligibility criteria for ESG beneficiaries are as follows: For essential services related to street outreach, beneficiaries must meet the criteria under paragraph (1)(i) of the “homeless” definition under § 576.2. For emergency shelter, beneficiaries must meet the “homeless” definition in 24 CFR 576.2. For essential services related to emergency shelter, beneficiaries must be “homeless” and staying in an emergency shelter (which could include a day shelter). For homelessness prevention assistance, beneficiaries must meet the requirements described in 24 CFR 576.103par. For rapid re-housing assistance, beneficiaries must meet requirements described in 24 CFR 576.104. Further eligibility criteria may be established at the local level in accordance with 24 CFR 576.400(e).

5.1 Documentation of Housing Status

Subgrantees must verify, describe, and document eligible housing status prior to program entry.

See required *ESG-CV Household Eligibility – Prevention and ESG Household Eligibility – Rapid Re-Housing* forms for documentation requirements. All ESG-CV forms can be found on the Commerce website: [ESG-CV Forms](#).

5.2 Documentation of Income Eligibility

Documentation of income eligibility is required prior to program entry for Homelessness Prevention. Documentation of income eligibility is not required until eligibility recertification for households served with Rapid Re-housing assistance.

Income is money that is paid to, or on behalf of, the head of household or spouse (even if temporarily absent) or to any other household member 18 years or older. (Persons fleeing domestic violence do not have to report the abuser’s income.) Income also includes all amounts which are anticipated to be received from a source outside the family during the 12- month period following admission or annual reexamination effective date. When determining the annual income of an individual or family, the grantee must use the standard for calculating annual income under [24 CFR §5.609](#). An income eligibility calculator can be found on the [HUD Exchange](#).

Income inclusions and exclusions are listed in the Electronic Code of Federal Regulations, <http://www.ecfr.gov/>, Title 24 – Housing and Urban Development: Subtitle A 0-99: Part 5: Subpart F: [Section 5.609 Annual Income](#).

5.3 Eligibility Recertification

Household eligibility and the types and amounts of assistance the household needs must be re-evaluated and documented not less than once every 6 months for households receiving homelessness prevention assistance, and not less than once annually for households receiving rapid re-housing assistance. At a minimum, each re-evaluation of eligibility must establish that:

1. The household does not have an annual income that exceeds 30% of Area Median Income for homeless households and 50% of Area Median Income for households at-risk of homelessness; **AND**
2. The household lacks sufficient resources and support networks necessary to retain housing without ESG-CV assistance. This can include a reassessment to avoid duplication of benefits.

See required *ESG-CV Household Eligibility – Re-Evaluation* form for documentation requirements.

At re-evaluation, a program participant whose income exceeds the requirements in the [ESG Program Interim Rule](#) or [Notice CPD-21-08](#), depending on which is applicable, would no longer be eligible for ESG-CV assistance.

5.4 Documentation Requirements for Rapid Re-Housing and Prevention

Households receiving Prevention or Rapid Re-Housing assistance, must have the following clearly noted and documented in the household's case file:

1. *Initial Consultation & Eligibility Determination:*
The household must receive an initial consultation and eligibility assessment to determine income and housing status eligibility and the appropriate type of assistance needed to regain stability in permanent housing.
2. *Assistance in obtaining mainstream and other resources:*
The household must receive appropriate supportive services and referrals essential to achieving independent living through other federal, state, local, and private assistance.
3. *Housing stability plan to include:*
 - (i) Needs assessment to include specific housing and self-sufficiency goals; and
 - (ii) Action steps to retain permanent housing after ESG-CV assistance ends.

Households receiving assistance from a victim service provider are exempted from the case management requirement.

6 Allowable Expenses

6.1 Administrative

Administrative Costs (24CFR §576.108)	
Allowable Expenses	<p>Up to 7% of the contracted budget may be allocated to administrative costs.</p> <p>Allowable administrative costs are those costs that benefit the organization as a whole. They include the following: executive director/accounting/human resources/IT salaries, benefits, office supplies and equipment; general organization insurance; organization wide audits; board expenses; organization-wide membership fees and dues. This list is not all-inclusive.</p>

6.2 HMIS

HMIS (24CFR §576.107)	
Allowable Expenses	<p>The grantee or subgrantees may use ESG-CV funds to pay the costs of contributing ESG-CV data to HMIS including the costs of:</p> <ul style="list-style-type: none">Purchasing or leasing computer hardware;Purchasing software or software licenses;Purchasing or leasing equipment, including telephones, fax machines, and furniture; Obtaining technical support; leasing office space.Paying charges for electricity, gas, water, phone service, and high-speed data transmission necessary to operate or contribute data to the HMIS.Paying salaries for operating HMIS, including:<ul style="list-style-type: none">(A) Completing data entry;(B) Monitoring and reviewing data quality;(C) Completing data analysis;(D) Reporting to the HMIS Lead;

	<p>(F) Training staff on using the HMIS or comparable database; and (G) Implementing and complying with HMIS requirements. Paying costs of staff to travel to and attend training on HMIS and programs authorized by Title IV of the McKinney-Vento Homeless Assistance Act; Paying staff travel costs to conduct intakes.</p> <p>HMIS costs are eligible beyond typical support of ESG-CV program activities(including HMIS costs not related to ESG-CV program participants) or program participants to the extent that they are necessary to help the geographic area prevent, prepare for, and respond to coronavirus.</p>
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6.3 Street Outreach

Street Outreach Component (24CFR §576.101) Services delivered on the street to persons living unsheltered	
Allowable Expenses	<p>Engagement: Activities to locate, identify, and build relationships with unsheltered homeless people for the purpose of providing immediate support, intervention, and connections with homeless assistance programs and/or mainstream social services and housing programs.</p> <p>Case Management: Assessing housing and service needs and arranging/coordinating/monitoring the delivery of individualized services.</p> <p>Emergency Health Services: Direct outpatient treatment of medical conditions by licensed medical professionals in community-based settings (e.g., streets, parks, and campgrounds) to those eligible participants for whom other appropriate health services are inaccessible or unavailable within the area.</p> <p>Emergency Mental Health Services: Direct outpatient treatment of mental health conditions by licensed professionals in community-based settings (e.g., streets, parks, and campgrounds) to those eligible participants for whom other appropriate health services are inaccessible or unavailable within the area.</p> <p>Transportation: The transportation costs of travel by outreach workers, social workers, medical professionals, or other service providers are eligible, provided that this travel takes place during the provision of services eligible under this section. The costs of transporting unsheltered people to emergency shelters or other service facilities are also eligible. These costs include: the cost of a program participant's travel on public transportation, mileage allowance for service workers to visit program participants, and the travel costs of recipient or subrecipient staff</p>

	<p>to accompany or assist program participants to use public transportation. Transporting staff or program participants to/from vaccine events, or community-wide transport for testing or vaccination. Vehicle purchase for transporting participants or staff serving participants to services and the cost of gas, insurance, taxes, and maintenance for the vehicle (grantees should work closely with Commerce to ensure compliance with HUD requirements for disposition).</p> <p>Services to Special Populations: Otherwise, eligible Essential Services, as listed above, that have been tailored to address the special needs of homeless youth, victims of domestic violence and related crimes/threats, and/or people living with HIV/AIDS who are literally homeless.</p> <p>Training on infectious disease prevention and mitigation for staff working directly with those at risk of contracting the coronavirus costs are allowable as a standalone activity – not part of administrative costs.</p> <p>Hazard pay for subrecipient staff working in locations with a high likelihood of contracting coronavirus.</p> <p>Installation and maintenance of portable handwashing stations, portable bathrooms, portable showers, and personal protective equipment for people experiencing unsheltered homelessness.</p> <p>Volunteer incentives</p> <p>Vaccine distribution activities, including:</p> <ul style="list-style-type: none"> • Renting spaces for vaccine events; • Hiring vaccine ambassadors to engage/educate peers about the vaccine; • Transporting people to/from vaccine events; • Mobile outreach vans and staff to support vaccine distribution; • Staff training on vaccine and rollout strategies; • PPE and supplies at vaccine events. <p>Cell phones may be loaned to program participants and the wireless service cost may be paid as needed to enable program participants to participate in activities necessary to obtain or maintain housing.</p> <p>Additional costs needed to update, enhance, and operate the applicable centralized or coordinated assessment system under 24 CFR 576.400(d)</p>
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	<p>Equipment purchased with ESG-CV funds must adhere to the requirements of 2 CFR 200.313. The disposition requirement of equipment (vehicles, handwashing sinks, portable bathrooms, furniture, etc.) under 2 CFR 200.313(e) is not triggered if the per unit current market value of the item is below \$5,000. Invoices or receipts may show multiple items with a total above \$5,000 if the current market value of the individual item is below \$5,000.</p> <p>An item with a current market value over \$5,000 may be retained without triggering the disposition requirements if it continues to be used for its original purpose or program (Street Outreach or Emergency Shelter for example) after ESG-CV.</p>
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6.4 Emergency Shelter Case Management, Operations, and Temporary Emergency Shelter

Emergency Shelter Component (24CFR §576.102) Services delivered to households experiencing homelessness in temporary shelter; shelter rehabilitation and shelter operations.	
Allowable Expenses: Shelter Case Management	<p>The cost of assessing, arranging, coordinating, and monitoring the delivery of individualized services to meet the needs of the program participant is eligible. Component services and activities consist of: Using the centralized or coordinated assessment system; Conducting the initial evaluation including verifying and documenting eligibility; Counseling; Developing, securing, and coordinating services and obtaining Federal, State, and local benefits; Monitoring and evaluating program participant progress; Providing information and referrals to other providers; Providing ongoing risk assessment and safety planning with victims of domestic violence, dating violence, sexual assault, and stalking; and Developing an individualized housing and service plan, including planning a path to permanent housing stability</p> <p>Additional allowable expenses include: (See CFR for details):</p> <ul style="list-style-type: none"> Childcare Education services Employment assistance and job training Outpatient health services Legal services <p>Training on infectious disease prevention and mitigation for staff working directly with those at risk of contracting the coronavirus costs are allowable as a standalone activity – not part of administrative costs.</p>

	<p>Hazard pay for subrecipient staff working in locations with a high likelihood of contracting coronavirus.</p> <p>Volunteer incentives</p> <p>Vaccine distribution activities, including:</p> <ul style="list-style-type: none"> • Renting spaces for vaccine events; • Hiring vaccine ambassadors to engage/educate peers about the vaccine; • Transporting people to/from vaccine events including community-wide transport for testing or vaccination; • Mobile outreach vans and staff to support vaccine distribution; • Staff training on vaccine and rollout strategies; • PPE and supplies at vaccine events
<p>Allowable Expenses: Shelter Operations</p>	<p>The costs of maintenance (including minor or routine repairs), rent, security, fuel, equipment, insurance, utilities, food, furnishings, and supplies necessary for the operation of the emergency shelter.</p> <p>Hotel or motel costs are eligible where no appropriate emergency shelter is available, including costs for cleaning and damage repair.</p> <p>Installation and maintenance of handwashing stations and portable bathrooms for people experiencing unsheltered homelessness.</p> <p>Protective equipment (face masks, face shields, disposable gloves, sneeze guards, cots, room dividers, air filters, air purifiers)</p> <p>Outpatient health services provided by licensed medical professionals if unavailable within the community.</p> <p>Transportation: Eligible costs consist of the transportation costs of a program participant's travel to and from medical care, employment, child care, or other eligible essential services facilities. These costs include the following: the cost of a program participant's travel on public transportation, mileage allowance for service workers to visit program participants, the travel costs of recipient or subrecipient staff to accompany or assist program participants to use public transportation. Transporting staff or program participants to/from vaccine events. Vehicle purchase for transporting participants or staff serving participants to services and the cost of gas, insurance, taxes, and maintenance for the vehicle (grantees should work closely with Commerce to ensure</p>

	<p>compliance with HUD requirements for disposition).</p> <p>Equipment purchased with ESG-CV funds must adhere to the requirements of 2 CFR 200.313. The disposition requirement of equipment (vehicles, handwashing sinks, portable bathrooms, furniture, etc.) under 2 CFR 200.313(e) is not triggered if the per unit current market value of the item is below \$5,000. Invoices or receipts may show multiple items with a total above \$5,000 if the current market value of the individual item is below \$5,000.</p> <p>An item with a current market value over \$5,000 may be retained without triggering the disposition requirements if it continues to be used for its original purpose or program (Street Outreach or Emergency Shelter for example) after ESG-CV.</p>
Allowable Expenses: Temporary Emergency Shelter	<p>Leasing existing real property or temporary structures, acquisition, and renovation of real property for temporary emergency shelter for individuals and families experiencing homelessness to prevent, prepare for, and respond to coronavirus. Funds used for acquisition or renovation (including conversion or major rehabilitation) are subject to property's use and disposition requirements in 2 CFR 200.311 (c)(1) or (2). Shelter operation costs including the cost of maintenance, rent, security, fuel, equipment, utilities, food, furnishings, supplies necessary for the operation of the temporary shelter.</p> <p>Services, including essential services, housing search and placement services, and housing search and counseling services. 24 CFR 576.102 (a)(1), 24 CFR 576.105 (b)(1), and housing search and counseling services under 24 CFR 578.53(e)(8) and HUD ESG-CV Notice.</p> <p>Equipment purchased with ESG-CV funds must adhere to the requirements of 2 CFR 200.313. The disposition requirement of equipment (vehicles, handwashing sinks, portable bathrooms, furniture, etc.) under 2 CFR 200.313(e) is not triggered if the per unit current market value of the item is below \$5,000. Invoices or receipts may show multiple items with a total above \$5,000 if the current market value of the individual item is below \$5,000.</p> <p>An item with a current market value over \$5,000 may be retained without triggering the disposition requirements if it continues to be used for its original purpose or program (Street Outreach or Emergency Shelter for example) after ESG-CV.</p>

6.5 Rapid Re-Housing and Prevention Rental Assistance

Rental Assistance (24CFR §576.106)	
Allowable Expenses	<p>Rent assistance</p> <p>Rental arrears and associated late fees for up to six months. Rental arrears may be paid if the payment enables the household to obtain or maintain permanent housing. If funds are used to pay rental arrears, arrears must be included in determining the total period of the household's rental assistance.</p> <p>Total to not exceed 24 months during any 3-year period, including any payment for last month's rent (which is billed under Other Financial Assistance).</p> <p>If a program participant moves into a unit in the middle of the month, the initial payment of a half month's rent does not count towards the program participant's total rental assistance.</p> <p>If a participant is receiving rental assistance and meets the conditions for an Emergency Transfer under 24 CFR 5.2005(e), funds may be used to pay amounts owed for breaking a lease to effect an Emergency Transfer.</p>

6.6 Rapid Re-Housing and Prevention Case Management

Housing Relocation and Stabilization Services (24CFR §576.105)	
Allowable Expenses	<p>Housing Search and Placement Assessment of housing barriers, needs and preferences; Development of an action plan for locating housing; Housing search and outreach to, and negotiation with owner; Assistance with submitting rental applications and understanding leases; Assessment of housing for compliance with ESG requirements for habitability, lead based paint, and rent reasonableness; Assistance with obtaining utilities and making moving arrangements; Tenant counseling.</p> <p>Housing Stability Case Management Assessing, arranging, coordinating, and monitoring the delivery of individualized services to facilitate housing stability; Using the centralized or coordinated assessment system to conduct the initial evaluation and re-evaluation; Legal services. Legal services established in 24 CFR 576.102(a)(1)(vi) and 24 CFR 576.105(b)(4) are limited to those services necessary to help program</p>

	<p>participants obtain housing or keep a program participant from losing housing where they currently reside.</p> <p>Counseling;</p> <p>Developing, securing, and coordinating services including Federal, state, and local benefits;</p> <p>Monitoring and evaluating program participant progress;</p> <p>Providing information and referrals to other providers;</p> <p>Developing an individualized housing and service plan.</p> <p>Assistance can be provided for 60 days during the period the program participant is seeking permanent housing. If the program participant needs assistance after 60 days, it can be billed to Emergency Shelter Case Management. There is no limit on the time for assistance while the program participant is living in permanent housing.</p> <p>Training on infectious disease prevention and mitigation for staff working directly with those at risk of contracting the coronavirus costs are allowable as a standalone activity – not part of administrative costs</p> <p>Essential Services detailed in 24CFR §576.102 are allowable for households receiving rapid rehousing and homelessness prevention assistance.</p>
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6.7 Rapid Re-Housing and Prevention Other Financial Assistance

Housing Relocation and Stabilization Services (24CFR §576.105)	
Allowable Expenses	<p>Rental Application Fees that are charged by the owner to all applicants</p> <p>Security Deposits equal to no more than two months' rent. If agencies are retaining returned security deposits, they must follow Program Income requirements as described in the ESG-CV Notice.</p> <p>Last month's rent</p> <p>Moving Costs, such as truck rental, hiring a moving company, or temporary storage fees for a maximum of three months after the participant begins to receive services but before they move into permanent housing. Arrearages are not eligible.</p> <p>Utility Deposits required by the utility company for all customers (i.e., gas, electric, water/sewage)</p> <p>Utility Payments for up to 24 months of per household, per service (i.e., gas, electric, water/sewage), including up to 6 months of arrearages, per service.</p> <p>Landlord incentives may be paid up to three (3) times the rent charged for the unit:</p>

	<ul style="list-style-type: none"> a. Signing bonuses equal to up to 2 months of rent b. Security deposits equal to up to 3 months of rent c. Paying the cost to repair damages not covered by the security deposit or that are incurred while the program participant is still residing in the unit d. Paying the costs of extra cleaning or maintenance of unit or appliances <p>Volunteer incentives</p> <p>Furniture and household furnishings for use by program participants while they are receiving homelessness prevention and rapid re-housing assistance. Purchases are subject to the requirements for equipment at 2 CFR 200.313, including the disposition requirements included in paragraph (e) of that section.</p> <p>Equipment purchased with ESG-CV funds must adhere to the requirements of 2 CFR 200.313. The disposition requirement of equipment (vehicles, handwashing sinks, portable bathrooms, furniture, etc.) under 2 CFR 200.313(e) is not triggered if the per unit current market value of the item is below \$5,000. Invoices or receipts may show multiple items with a total above \$5,000 if the current market value of the individual item is below \$5,000.</p>
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7 Requirements of all Subgrantees Providing Direct Service

7.1 Coordinated Entry

ESG-CV funded projects must participate in the local Coordinated Entry (CE) as defined by Coordinated Entry System policies and procedures. Separate assessment and access points are allowable for prevention projects.

Projects operated by victim service providers are not required but may elect to participate in the county or regional CE process.

During COVID-19, jurisdictions may consider changing assessment or prioritization to include COVID-19 vulnerabilities such as age, specific health conditions and/or medical frailty. The Thurston County CE system utilizes a standard tool, that prioritizes special and high-risk populations, the VI-SPDAT. While individual providers made accommodations due to COVID, the CE system being already rooted in prioritizing vulnerable populations, did not make any significant changes to policies and procedures. Street Outreach projects funded by ESG-CV must be linked to the county or regional Coordinated Entry (CE) by either performing mobile CE process services (e.g., assessment) or by providing referrals to CE.

In Thurston County Emergency Shelters, Drop-in Shelters and Temporary Shelter Sites fill beds through a mixture of Coordinated Entry and direct referrals. If the project has other funding sources that do not require participation in the CE process, the project must fill openings, beds or units funded with ESG-CV exclusively through the CE process. Those projects funded by ESG-CV must participate in the county or regional CE process by accepting referrals. The Coordinated Entry policies are in [Appendix H](#).

Coordinated Entry providers meet monthly to discuss system performance, and relevant topics related to Coordinated Entry operations that arise during that time. There is a high level of coordination between the three CE providers (Family Support Center, Community Action Council, and Community Youth Services), and Thurston County. In the Homeless Crisis Response Plan, Coordinated Entry and improving data collection and quality are stated targets, which has been furthered with ESG-CV funding.

7.2 Low Barrier Services

Households must not be required to receive treatment or perform any other prerequisite activities as a condition for receiving shelter, housing, or other services for which ESG-CV funds are used. This includes housing case management. Program policies should not place a burden on persons accessing housing or shelter and maintaining their placement in the program.

If an individual poses a direct threat to the health or safety of others that cannot be reduced or eliminated, assistance may be denied. The threat must be based on an individualized assessment that is due to actual behavior, not on speculation or fear about the types of harm that may be caused.

7.3 Protection for Victims of Domestic Violence, Dating Violence, Sexual Assault, or Stalking

HUD's Emergency Transfer Plans outlined in 24 CFR 5.2005 only apply to a covered housing providers providing rental assistance. For the ESG-CV program, "covered housing provider," as such term is used in HUD's regulations in [24 CFR part 5, subpart L](#), refers to:

- The grantee that administers the Rental Assistance for the purposes of [24 CFR 5.2005\(e\)](#)
- The housing owner for the purposes of [24 CFR 5.2005\(d\)\(1\)](#), [\(d\)\(3\)](#), and [\(d\)\(4\)](#) and [5.2009\(a\)](#)
- The housing owner and the grantee that administers the Rental Assistance for the purposes of [24 CFR 5.2005\(d\)\(2\)](#)
- The housing owner and the grantee that administers the Rental Assistance for the purposes of [24 CFR 5.2007](#). However, the County may limit documentation requests under [24 CFR 5.2007](#) to only the grantee, provided that:
 - This limitation is made clear in both the notice described under [24 CFR 5.2005\(a\)\(1\)](#) and the rental assistance agreement
 - The entity designated to receive documentation request determines whether the participant is entitled to protection under VAWA and immediately advises

- the participant of the determination
- If the participant is entitled to protection, the entity designated to receive documentation requests must notify the owner in writing that the participant is entitled to protection under VAWA and work with the owner on the participant's behalf. Any further sharing or disclosure of the participant's information will be subject to the requirements in [24 CFR 5.2007](#).

7.4 HMIS

Subgrantees providing direct service must enter client data into the Homeless Management Information System (HMIS) for all ESG-CV funded projects in accordance with the most current [HMIS Data Standards](#) and the [ESG Program HMIS Manual](#).

7.4.1 Data Quality

Projects are required to provide quality data to the best of their ability. Maintaining good data quality is important for effective program evaluation. Data quality has four elements: completeness, timeliness, accuracy, and consistency.

7.4.1.1 Completeness

Completeness of data is measured by the percentage of incomplete fields in required data elements.

Agencies are expected to collect **first name, last name, date of birth, race, and ethnicity** from clients that give consent on the [HMIS consent form](#). **Agencies will never require a client to provide this information even if they have consented but should gather it to the best of their ability.** All clients, consenting and non-consenting, must have complete **prior living situation** and **exit destination** data.

Examples of incomplete entries:

Incomplete Entries	
Data Element	Incomplete if...
Name*	[Quality of Name] field contains Partial, Street name, or Code name, Client doesn't know, Client refused, or Data not collected; or [First Name] or [Last Name] is missing.
Date of Birth*	[Quality of DOB] field contains Approximate, Partial DOB reported, Client doesn't know, Client refused, or Data not collected; or [Date of Birth] is missing.
Race*	[Race] field contains Client doesn't know, Client refused, Data not collected, or is missing.
Ethnicity*	[Ethnicity] field contains Client doesn't know, Client refused, Data not collected, or is missing.
Prior Living Situation	[Prior Living Situation] is client doesn't know, client refused, data not collected, or is missing.
Destination	[Destination] is Client doesn't know, Client refused, No exit interview completed, Data not collected or is missing.

*Only measured for consenting clients.

Expected completeness measures:

For non-Victim Service providers: Name*, Social Security Number* and Date of Birth should have an error rate below 15-20%. Race*, Ethnicity* and Gender should have an error rate below 5%.

*Only measured for consenting clients.

7.4.1.2 Timeliness

Client data should be entered into HMIS as close to the date of collection as possible. Entering data as soon as possible supports data quality by avoiding backlogs of pending data and allowing near real time analysis and reporting.

Projects must enter/update project client/household data in HMIS **within 14 calendar days** following the date of project enrollment/exit.

7.4.1.3 Accuracy

Data entered into HMIS must reflect the real situation of the client/household as closely as possible.

Accurate data is necessary to ensure any project reporting fairly represents the work of the project and each client's story.

Examples of data accuracy:

Elements of Data Accuracy	
Date of Birth and Project Start Date	Ensure the two are not the same dates.
Prior Living Situation data elements	Ensure responses for Prior living situation, Length of stay in prior living situation, Approximate date homelessness started, Number of times the client has experienced homelessness in the last 3 years, and Number of months experiencing homelessness in the last 3 years do not conflict with each other.
Disabling Condition	Ensure the Yes/No answer does not conflict with the specific types of disabling conditions.
Health Insurance	Ensure the Yes/No answer does not conflict with the specific types of health insurance.
Monthly Income	Ensure the Yes/No answer does not conflict with the specific sources of monthly income.
Non-Cash Benefits	Ensure the Yes/No answer does not conflict with the specific sources of non-cash benefits.
Relationship to Head of Household	Ensure there is only one Head of Household for any given household (including clients served individually) and that this element is entered and accurate for all household members.
Veteran Status	Ensure individuals under 18 years of age are not identified as veterans.

Project Population Specifics	<p>Ensure that projects only serving individuals only enroll individuals and not multi-person households.</p> <p>Ensure that projects only serving families with children only enroll families with children.</p> <p>Ensure that projects only serving clients of a specific age range only enroll clients of that age range.</p>
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7.4.1.4 Consistency

Consistent data helps ensure that any reporting generated by a project is understood. Data consistency is important for effectively communicating the processes and outcomes of a project.

All data will be collected, entered, and stored in accordance with the [Agency Partner Agreement](#).

All data elements and responses will be entered per the [HUD Data Standards Manual](#). To avoid inconsistency, agencies should use language on intake forms that closely matches the elements and responses in HMIS.

Clients who refuse consent must be made anonymous per [Department of Commerce Guidance](#) and the [consent refused client entry guide](#).

7.5 Consent for Entry of Personal Identifying Information

7.5.1 Identified Records

- ✓ Personally identifying information (PII) must not be entered into HMIS unless all adult household members have provided informed consent. PII includes: name, social security number, birthdate, address, phone number, email, and photo.
- ✓ Informed consent must be documented with a signed copy of the Client Release of Information and Informed Consent Form in the client file. If electronic consent has been received, a copy does not need to be printed for the client file but must be available in HMIS. If telephonic consent has been received, complete the consent form the first time the household is seen in person.

7.5.2 Anonymous Records

The following types of records must be entered anonymously:

- ✓ Households in which one adult member does not provide informed consent for themselves or their dependents
- ✓ Households entering a domestic violence program or currently fleeing or in danger from a domestic violence, dating violence, sexual assault, human trafficking, or a stalking situation
- ✓ Minors under the age of 13 with no parent or guardian available to consent to the minor's information in HMIS
- ✓ Households in programs which are required by funders to report HIV/AIDS status

7.5.3 Special Circumstances

If the reporting of the HIV/AIDS status of clients is not specifically required, the HIV/AIDS status must not be entered in HMIS.

If a combination of race, ethnicity, gender, or other demographic data could be identifying in your community, those data should not be entered for anonymous records.

7.6 Habitability Standards

Thurston County does not exempt units or shelters from having to be compliant with local housing codes. Therefore, if there are requirements that are in both the local housing code and the Habitability Standards, the subgrantee must comply with the more stringent of the two.

7.6.1 Minimum Standards for Emergency Shelters

If ESG-CV funds are used for renovation or shelter operations, the building must meet the minimum standards for safety, sanitation, and privacy provided in [Appendix C](#).

The subgrantee must maintain documentation of compliance with the minimum standards for Emergency Shelter activities. An inspection of the emergency shelter facility is required to be completed annually.

Habitability and environmental reviews are not required for Temporary Emergency Shelters, or for hotel/motel stays under 30 days.

7.6.2 Minimum Standards for Permanent Housing

ESG-CV funds may not be used to assist a household in remaining in or moving into housing that does not meet the minimum habitability standards provided in Appendix C. This restriction applies to all activities under Homelessness Prevention and Rapid Re-housing components, including rental assistance and housing relocation and stabilization services.

If a household is provided homelessness prevention assistance to stay in current housing, the housing must be inspected and found to meet the minimum habitability standards before the grantee incurs ESG-CV costs for any of the following:

- Providing any service to the household;
- Entering into a rental assistance agreement; or
- Making any payment on behalf of the program participant (e.g., rental or utility arrears, rental or utility payments, etc.)

7.7 Environmental Review

An environmental review is the process of reviewing a project and its potential environmental impacts to determine whether it meets federal, state, and local environmental standards. The environmental review process is required for all HUD-assisted projects to ensure that the proposed project does not negatively impact the surrounding environment and that the

property site itself will not have an adverse environmental or health effect on end users. Not every project is subject to a full environmental review (i.e., every project's environmental impact must be examined, but the extent of this examination varies), but every project must be in compliance with the [National Environmental Policy Act \(NEPA\)](#), and other related Federal and state environmental laws.

Subgrantees should coordinate closely with Thurston County staff to ensure compliance with Environmental Review requirements in 24 CFR Part 58. There are currently no capital projects that are being funded with ESG-CV funds in Thurston County that require environmental review.

7.8 Housing Inspections and Lead-based Paint Inspections

7.8.1 Lead-based Paint Screening

Grantees are required to conduct a Lead-based Paint Screening for all shelters or units receiving ESG-CV funding under Emergency Shelter, Rapid Re-Housing, or Prevention Assistance, including assistance that is limited to rental arrears in current housing units.

The shelter or unit must pass the lead screening before any expenses, including rent are paid. A lead screening less than 12 months old performed by a qualified inspector can be used. Program staff should complete the ESG-CV Lead-based Paint Screening Worksheet (or comparable form) for the case file and document any exemptions. If any exemptions are met, then lead-based paint requirements are not triggered, and no further action is needed. Complete records of inspections and follow-up actions must be maintained in the shelter or household file.

The Lead-based Paint Screening will determine if the shelter or unit is subject to a Visual Assessment discussed next in section 7.8.2.

7.8.2 Lead-based Paint Visual Assessments

The lead-based paint visual assessment requirement exists to protect vulnerable families from potential health hazards. To prevent lead poisoning in young children, grantees must comply with the Lead-based Paint Hazard Reduction Act of 1992 and its applicable regulations found at 24 CFR §35, subparts A, B, H, J, K, M, and R.

A lead-based paint visual assessment must be completed for all units and shelters that meet the three following conditions:

The household moving into or remaining in their current unit is receiving ESG-CV financial assistance. AND

The unit was constructed prior to 1978. AND

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

Subgrantees must conduct a visual assessment prior to providing ESG-CV financial assistance to the unit and on an annual basis thereafter (as long as assistance is provided). Visual assessments must be conducted by a HUD-Certified Visual Assessor and must be documented on the HQS or HSS and maintained in the client file. HUD offers on-line visual assessment training.

7.8.3 Exceptions to Lead-based Paint Visual Assessment Requirement

Visual assessments are not required under the following circumstances:

- ✓ 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 §35.115(a).

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

7.9 Duplication of Benefits

“Duplication of benefits” occurs when an individual or household receives financial assistance for the same service from multiple funding sources. Grantees must determine and document if the household is receiving assistance from other sources (e.g., philanthropy, faith-based, CDBG-CV, CHG, etc.) to avoid duplication of benefits as well as verify that the other form of assistance does not disqualify the eligibility of the individual or household. ([Section 312 \(42 U.S.C. 5155\)](#)).

7.10 Recordkeeping Requirements for Subgrantees Providing Rent Assistance

See [Appendix D](#) for recordkeeping requirements.

7.11 Data Collection

Federal rules require each lead/subgrantees to enter client data into a Homeless Management Information System (HMIS) per Section 7.3 and the Agency Partner HMIS Agreement (see [Appendix E](#)).

Each subgrantee must follow all state and federal laws governing HMIS, including collecting informed written consent from program participants, not denying service based solely on program participant refusal to provide data to an HMIS, protecting program participant confidentiality, not collecting personally identifying information from program participants that are victims of domestic violence, and other requirements defined in [RCW 43.185C.030](#), [43.185C.180](#), and [VAWA Reauthorization Section 605](#).

7.12 Termination of Participation, Denial and Grievance Procedures

Grantees must have written termination, denial, and grievance policies and/or procedures. The policies and/or procedures should be readily available to households either in written information or by posting the policy in a public place and should include the right of the participant to contact the agency director, the Department of Commerce, or HUD. It is important to effectively communicate these policies and/or procedures to households and ensure that they are fully understood. Causes for termination may include, but are not limited to, failure to abide by any agreed upon requirements and fraud. A grievance procedure must include:

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

The VAWA regulatory requirements under [24 CFR part 5, subpart L](#), apply to all eligibility and termination decisions that are made with respect to ESG-CV Rental Assistance. At a minimum, these policies must be person-centered, trauma-informed, and follow Housing First principles.

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

1. Circumstances in which a household may not qualify or would be denied;
2. Notification of denial;
3. A household's right to review a grantee's decision.

7.13 Confidentiality of Client Records

Subgrantees must have policies and/or procedures to ensure that client records are maintained in a confidential manner as per RCW [43.185C.030](#) and keep written records or files pertaining to households under lock and key with designated personnel granted access to those files.

Subgrantees must also ensure that confidentiality and privacy policies meet the specific confidentiality and security requirements for HMIS data which are described in the [HMIS Data and Technical Standards](#).

7.14 Equal Access

Grantees must ensure that the admissions, occupancy, and operating policies and procedures of recipients, subrecipients, owners, operators, managers, and providers funded with ESG-CV, 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 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 as required by [24 CFR 5.105\(a\)\(2\)](#).

8 Washington State's Landlord Mitigation Law

Washington State's Landlord Mitigation Law ([RCW 43.31.605](#)) became effective on June 7, 2018 to provide landlords with an incentive and added security to work with tenants receiving rental assistance. The program offers up to \$1,000 to the landlord in reimbursement for some potentially required move-in upgrades, up to fourteen days' rent loss and up to \$5,000 in qualifying damages caused by a tenant during tenancy. A move in/move out condition report is required for a landlord to receive reimbursement.

For more information, please visit the Commerce Landlord Mitigation Program [website](#).

9 Appendices

Appendix A: Required and Recommended Forms

The following forms are required, if applicable. Forms may be modified if all of the content is included. All forms are posted on the Commerce ESG-CV [website](#).

- ✓ ESG-CV Household Eligibility – Prevention
- ✓ ESG-CV Household Eligibility – Rapid Re-Housing
- ✓ ESG-CV Household Eligibility – Re-Evaluation
- ✓ Third-Party Oral Verification
- ✓ Self-Declaration of Eligibility
- ✓ ESG-CV Utility Assistance
- ✓ ESG-CV Client File Checklist
- ✓ BVS Client Consent Form
- ✓ Rent Reasonableness Form

The following form is recommended.

- ✓ Move in/move out condition report from the Commerce Landlord Mitigation Program [website](#).

Appendix B: Required Policies and Procedures

Required written standards as described in 24 CFR 56.400 (e) of the ESG Interim Rule and adapted for ESG-CV including:

- ✓ Summary of how ESG-CV funds are being used to prevent, prepare for and respond to

- ✓ coronavirus
- ✓ Emergency Transfer Plan
- ✓ Rent Limit Policy
- ✓ Coordinated Entry Policies
- ✓ Termination of Participation, Denial, and Grievance Procedures

Appendix C: Habitability Standards

The minimum standards for emergency shelters are below. An inspection for hotel/motel stays under 30 days billed under Emergency Shelter is not required.

- ✓ Structure and materials: The structures must be structurally sound to protect the residents from the elements and not pose any threat to the health and safety of the residents.
- ✓ Any renovation (including major rehabilitation and conversion) carried out with ESG assistance uses Energy Star and WaterSense products and appliances.
- ✓ Access. Where applicable, the shelter is accessible in accordance with: Section 504 of the Rehabilitation Act (29 U.S.C. 794) and implementing regulations at 24 CFR part 8; the Fair Housing Act (42 U.S.C. 3601 et seq.) and implementing regulations at 24 CFR part 100; and Title II of the Americans with Disabilities Act (42 U.S.C. 12131 et seq.) and 28 CFR part 35.
- ✓ Space and security: Except where the shelter is intended for day use only, the shelter provides each program participant in the shelter with an acceptable place to sleep and adequate space and security for themselves and their belongings.
- ✓ Interior air quality: Each room or space within the shelter has a natural or mechanical means of ventilation. The interior air is free of pollutants at a level that might threaten or harm the health of residents.
- ✓ Water Supply: The shelter's water supply is free of contamination.
- ✓ Sanitary Facilities: Each program participant in the shelter has access to sanitary facilities that are in proper operating condition, are private, and are adequate for personal cleanliness and the disposal of human waste.
- ✓ Thermal environment: The shelter has any necessary heating/cooling facilities in proper operating condition.
- ✓ Illumination and electricity: The shelter has adequate natural or artificial illumination to permit normal indoor activities and support health and safety. There are sufficient electrical sources to permit the safe use of electrical appliances in the shelter.
- ✓ Food preparation: Food preparation areas, if any, contain suitable space and equipment to store, prepare, and serve food in a safe and sanitary manner.
- ✓ Sanitary conditions: The shelter is maintained in a sanitary condition.
- ✓ Fire safety: There is at least one working smoke detector in each occupied unit of the shelter. Where possible, smoke detectors are located near sleeping areas. All public areas of the shelter have at least one working smoke detector. The fire alarm system is designed for hearing-impaired residents. There is a second means of exiting the building in the event of fire or other emergency.

The minimum standards for permanent housing are:

- ✓ Structure and materials. The structures must be structurally sound to protect residents from the elements and not pose any threat to the health and safety of the residents.
- ✓ Space and security. Each resident must be provided adequate space and security for themselves and their belongings. Each resident must be provided an acceptable place to sleep.
- ✓ Interior air quality. Each room or space must have a natural or mechanical means of ventilation. The interior air must be free of pollutants at a level that might threaten or harm the health of residents.
- ✓ Water supply. The water supply must be free from contamination.
- ✓ Sanitary facilities. Residents must have access to sufficient sanitary facilities that are in proper operating condition, are private, and are adequate for personal cleanliness and the disposal of human waste.
- ✓ Thermal environment. The housing must have any necessary heating/cooling facilities in proper operating condition.
- ✓ Illumination and electricity. The structure must have adequate natural or artificial illumination to permit normal indoor activities and support health and safety. There must be sufficient electrical sources to permit the safe use of electrical appliances in the structure.
- ✓ Food preparation. All food preparation areas must contain suitable space and equipment to store, prepare, and serve food in a safe and sanitary manner.
- ✓ Sanitary conditions. The housing must be maintained in a sanitary condition.
- ✓ Fire safety.
- ✓ There must be a second means of exiting the building in the event of fire or other emergency.
- ✓ Each unit or shelter must include at least one battery-operated or hard-wired smoke detector, in proper working condition, on each occupied level. Smoke detectors must be located, to the extent practicable, in a hallway adjacent to a bedroom. If the unit is occupied by hearing impaired persons, smoke detectors must have an alarm system designed for hearing-impaired persons in each bedroom occupied by a hearing-impaired person.
- ✓ The public areas of all housing must be equipped with a sufficient number, but not less than one for each area, of battery-operated or hard-wired smoke detectors. Public areas include, but are not limited to, laundry rooms, community rooms, day care centers, hallways, stairwells, and other common areas.

Appendix D: Recordkeeping Requirements for Grantees Providing Rent Assistance

Homeless status

The grantee and subgrantees must maintain and follow written intake procedures to ensure compliance with the homeless definition in [§576.2](#). The procedures must require documentation at intake of the evidence relied upon to establish and verify homeless status.

The procedures must establish the order of priority for obtaining evidence as third-party documentation first, intake worker observations second, and certification from the person seeking assistance third. However, lack of third-party documentation must not prevent an individual or family from being immediately admitted to emergency shelter, receiving street outreach services, or being immediately admitted to shelter or receiving services provided by a victim service provider. Records contained in an HMIS or comparable database used by victim service or legal service providers are acceptable evidence of third-party documentation and intake worker observations if the HMIS retains an auditable history of all entries, including the person who entered the data, the date of entry, and the change made; and if the HMIS prevents overrides or changes of the dates on which entries are made.

1. If the individual or family qualifies as homeless under paragraph (1)(i) or (ii) of the homeless definition in [§576.2](#), acceptable evidence includes a written observation by an outreach worker of the conditions where the individual or family was living, a written referral by another housing or service provider, or a certification by the individual or head of household seeking assistance.
2. If the individual qualifies as homeless under paragraph (1)(iii) of the homeless definition in [§576.2](#), because he or she resided in an emergency shelter or place not meant for human habitation and is exiting an institution where he or she resided for 120 days or less, acceptable evidence includes the evidence described in paragraph (b)(1) of this section and one of the following:
 - a. Discharge paperwork or a written or oral referral from a social worker, case manager, or other appropriate official of the institution, stating the beginning and end dates of the time residing in the institution. All oral statements must be recorded by the intake worker; or
 - b. Where the evidence in paragraph (b)(2)(i) of this section is not obtainable, a written record of the intake worker's due diligence in attempting to obtain the evidence described in paragraph (b)(2)(i) and a certification by the individual seeking assistance that states he or she is exiting or has just exited an institution where he or she resided for 120 days or less.
3. If the individual or family qualifies as homeless under paragraph (2) of the homeless definition in §576.2, because the individual or family will imminently lose their housing, the evidence must include:
 - a. A court order resulting from an eviction action that requires the individual or family to leave their residence within 14 days after the date of their application for homeless assistance; or the equivalent notice under applicable state law, a Notice to Quit, or a Notice to Terminate issued under state law;
 - b. For individuals and families whose primary nighttime residence is a hotel or motel room not paid for by charitable organizations or federal, state, or local government programs for low-income individuals, evidence that the individual or family lacks the resources necessary to reside there for more than 14 days after the date of application for homeless assistance; or
 - c. An oral statement by the individual or head of household that the owner or renter of the housing in which they currently reside will not allow them to stay

for more than 14 days after the date of application for homeless assistance. The intake worker must record the statement and certify that it was found credible. To be found credible, the oral statement must either: (I) be verified by the owner or renter of the housing in which the individual or family resides at the time of application for homeless assistance and documented by a written certification by the owner or renter or by the intake worker's recording of the owner or renter's oral statement; or (II) if the intake worker is unable to contact the owner or renter, be documented by a written certification by the intake worker of his or her due diligence in attempting to obtain the owner or renter's verification and the written certification by the individual or head of household seeking assistance that his or her statement was true and complete;

- i. Certification by the individual or head of household that no subsequent residence has been identified; and
 - ii. Certification or other written documentation that the individual or family lacks the resources and support networks needed to obtain other permanent housing.
4. If the individual or family qualifies under paragraph (4) of the homeless definition in [§576.2](#), because the individual or family is fleeing domestic violence, dating violence, sexual assault, stalking, or other dangerous or life-threatening conditions related to violence, then acceptable evidence includes an oral statement by the individual or head of household seeking assistance that they are fleeing that situation, that no subsequent residence has been identified and that they lack the resources or support networks, e.g., family, friends, faith-based or other social networks, needed to obtain other housing. If the individual or family is receiving shelter or services provided by a victim service provider, the oral statement must be documented by either a certification by the individual or head of household; or a certification by the intake worker. Otherwise, the oral statement that the individual or head of household seeking assistance has not identified a subsequent residence and lacks the resources or support networks, e.g., family, friends, faith-based or other social networks, needed to obtain housing must be documented by a certification by the individual or head of household that the oral statement is true and complete, and, where the safety of the individual or family would not be jeopardized, the domestic violence, dating violence, sexual assault, stalking, or other dangerous or life-threatening condition must be verified by a written observation by the intake worker or a written referral by a housing or service provider, social worker, legal assistance provider, health-care provider, law enforcement agency, legal assistance provider, pastoral counselor, or any other organization from whom the individual or head of household has sought assistance for domestic violence, dating violence, sexual assault, or stalking. The written referral or observation need only include the minimum amount of information necessary to document that the individual or family is fleeing, or attempting to flee domestic violence, dating violence, sexual assault, and stalking.

At risk of homelessness status.

For each individual or family who receives ESG-CV homelessness prevention assistance, the

records must include the evidence relied upon to establish and verify the individual or family's "at risk of homelessness" status. This evidence must include an intake and certification form that meets HUD specifications and is completed by the grantee and subgrantees. The evidence must also include:

- If the program participant meets the criteria under paragraph (1) of the "at risk of homelessness" definition in [§576.2](#):
 - a. The documentation specified under this section for determining annual income;
 - b. The program participant's certification on a form specified by HUD that the program participant has insufficient financial resources and support networks; e.g., family, friends, faith-based or other social networks, immediately available to attain housing stability and meets one or more of the conditions under paragraph (1)(iii) of the definition of "at risk of homelessness" in §576.2;
 - c. The most reliable evidence available to show that the program participant does not have sufficient resources or support networks; e.g., family, friends, faith-based or other social networks, immediately available to prevent them from moving to an emergency shelter or another place described in paragraph (1) of the "homeless" definition. Acceptable evidence includes:
 - i. Source documents (e.g., notice of termination from employment, unemployment compensation statement, bank statement, health-care bill showing arrears, utility bill showing arrears);
 - ii. To the extent that source documents are unobtainable, a written statement by the relevant third party (e.g., former employer, public administrator, relative) or the written certification by the grantee and subgrantees' intake staff of the oral verification by the relevant third party that the applicant meets one or both of the criteria under paragraph (1)(ii) of the definition of "at risk of homelessness" in §576.2; or
 - iii. To the extent that source documents and third-party verification are unobtainable, a written statement by the grantee and subgrantees' intake staff describing the efforts taken to obtain the required evidence; and
 - iv. The most reliable evidence available to show that the program participant meets one or more of the conditions under paragraph (1)(iii) of the definition of "at risk of homelessness" in §576.2. Acceptable evidence includes:
 - 1. Source documents that evidence one or more of the conditions under paragraph (1)(iii) of the definition (e.g., eviction notice, notice of termination from employment, bank statement);
 - 2. To the extent that source documents are unobtainable, a written statement by the relevant third party (e.g., former employer, owner, primary leaseholder, public administrator, hotel or motel manager) or the written certification by the grantee and subgrantees' intake staff of the oral verification by the relevant

third party that the applicant meets one or more of the criteria under paragraph (1)(iii) of the definition of “at risk of homelessness”; or

3. To the extent that source documents and third-party verification are unobtainable, a written statement by the grantee and subgrantees’ intake staff that the staff person has visited the applicant's residence and determined that the applicant meets one or more of the criteria under paragraph (1)(iii) of the definition or, if a visit is not practicable or relevant to the determination, a written statement by the grantee and subgrantees’ intake staff describing the efforts taken to obtain the required evidence.

Determinations of ineligibility

For each individual and family determined ineligible to receive Emergency Solutions Grant (ESG) assistance, the record must include documentation of the reason for that determination.

Annual income

For each program participant who receives homelessness prevention assistance, or who receives rapid re-housing assistance longer than one year, the following documentation of annual income must be maintained:

1. Income evaluation form containing the minimum requirements specified by HUD and completed by the grantee and subgrantees; and
2. Source documents for the assets held by the program participant and income received over the most recent period for which representative data is available before the date of the evaluation (e.g., wage statement, unemployment compensation statement, public benefits statement, bank statement);
3. To the extent that source documents are unobtainable, a written statement by the relevant third party (e.g., employer, government benefits administrator) or the written certification by the grantee and subgrantees’ intake staff of the oral verification by the relevant third party of the income the program participant received over the most recent period for which representative data is available; or
4. To the extent that source documents and third party verification are unobtainable, the written certification by the program participant of the amount of income the program participant received for the most recent period representative of the income that the program participant is reasonably expected to receive over the 3-month period following the evaluation.

Program participant records

In addition to evidence of homeless status or “at risk of homelessness” status, as applicable, records must be kept for each program participant that document:

1. The services and assistance provided to that program participant, including, as

applicable, the security deposit, rental assistance, and utility payments made on behalf of the program participant;

2. Compliance with the applicable requirements for providing services and assistance to that program participant under the program components and eligible activities provisions at [§576.101](#) through [§576.106](#), the provision on determining eligibility and amount and type of assistance at [§576.401\(a\) and \(b\)](#), and the provision on using appropriate assistance and services at [§576.401\(d\) and \(e\)](#); and
3. Where applicable, compliance with the termination of assistance requirement in [§576.402](#).

Centralized or coordinated assessment systems and procedures.

The grantee and subgrantees must keep documentation evidencing the use of, and written intake procedures for, the centralized or coordinated assessment system(s) developed by the Continuum of Care(s) in accordance with the requirements established by HUD. Additional costs to update/enhance/operate a coordinated entry system under [24 CFR 576.400\(d\)](#) are allowable. Documentation must show the use of funds is limited to an increase in system costs due to coronavirus. Recipient use of funds must be coordinated with the Continuum of Care (CoC).

Rental assistance agreements and payments

The records must include copies of all leases and rental assistance agreements for the provision of rental assistance, documentation of payments made to owners for the provision of rental assistance, and supporting documentation for these payments, including dates of occupancy by program participants.

Utility allowance

The records must document the monthly allowance for utilities (excluding telephone, cable, and internet) used to determine compliance with the rent restriction.

Shelter and housing standards

The records must include documentation of compliance with the shelter and housing standards in [§576.403](#), including inspection reports.

Services and assistance provided

The grantee and subgrantees that are units of general purpose local government must keep records to demonstrate compliance with the maintenance of effort requirement, including records of the unit of the general purpose local government's annual budgets and sources of funding for street outreach and emergency shelter services.

Conflicts of interest

The grantee and subgrantees must keep records to show compliance with the organizational conflicts-of-interest requirements in [§576.404\(a\)](#), a copy of the personal conflicts of interest policy or codes of conduct developed and implemented to comply with the requirements in [§576.404\(b\)](#), and records supporting exceptions to the personal conflicts of interest

prohibitions.

Faith-based activities

The grantee and subgrantees must document their compliance with the faith-based activities requirements under [§576.406](#).

Other Federal requirements

The grantee and subgrantees must document their compliance with the Federal requirements in [§576.407](#) and [§576.409](#), as applicable, including:

1. Records demonstrating compliance with the nondiscrimination and equal opportunity requirements under [§576.407\(a\)](#) and the affirmative outreach requirements in [§576.407\(b\)](#), including: data concerning race, ethnicity, disability status, sex, and family characteristics of persons and households who are applicants for, or program participants in, any program or activity funded in whole or in part with ESG funds.
2. Records demonstrating compliance with the uniform administrative requirements in 24 CFR part 200.
3. Records demonstrating compliance with the environmental review requirements, including flood insurance requirements.
4. Certifications and disclosure forms required under the lobbying and disclosure requirements in 24 CFR §87.
5. Data on emergency transfers requested under §576.409, pertaining to victims of domestic violence, dating violence, sexual assault, or stalking, including data on the outcomes of such requests.

Relocation

The records must include documentation of compliance with the displacement, relocation, and acquisition requirements in §576.408.

Confidentiality

The grantee and subgrantees must develop and implement written procedures to ensure:

- All records containing personally identifying information (as defined in HUD's standards for participation, data collection, and reporting in a local HMIS) of any individual or family who applies for and/or receives ESG assistance will be kept secure and confidential;
- The address or location of any domestic violence, dating violence, sexual assault, or stalking shelter project assisted under the ESG will not be made public, except with written authorization of the person responsible for the operation of the shelter; 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 grantee and subgrantees and consistent with state and local laws regarding privacy and obligations of confidentiality.

The confidentiality procedures of the grantee and subgrantees must be in writing and must be maintained in accordance with this section.

Period of record retention

All records pertaining to each fiscal year of ESG-CV funds must be retained for the greater of 5 years or the period specified below. Copies made by microfilming, photocopying, or similar methods may be substituted for the original records. Documentation of each program participant's qualification as a family or individual at risk of homelessness or as a homeless family or individual and other program participant records must be retained for 5 years after the expenditure of all funds from the grant under which the program participant was served.

Access to records

Federal Government rights. Notwithstanding the confidentiality procedures established under paragraph (x) of this section, the grantee and subgrantees must comply with the requirements for access to records in [2 CFR §200.336](#).

Appendix E: Agency Partner HMIS Agreement

The Agency Partner Agreement can be found at: <https://www.commerce.wa.gov/wp-content/uploads/2018/06/hau-hmis-agency-partner-agreement-2018.pdf>

Appendix F: Data Security Requirements

Subgrantees must adhere to all [HUD HMIS](#) and [Department of Social and Health Services](#) data security minimum standards.

Appendix G: Thurston County HMIS Interagency Data Sharing Agreement

Thurston County Homeless System Provider Network (TCN)

Interagency Data Sharing Agreement

Washington State HMIS

The Washington State Homeless Management Information System (HMIS) is designed to facilitate timely, efficient and effective information about services supporting persons and families who are homeless in Washington State, and to help measure results and outcomes of those services.

The Thurston County community has determined that its homeless provider agencies will use the HMIS and will individually and as a group participate in this data sharing agreement as an additional step in creating a unified homeless housing and service delivery system.

Our participating community based agencies shall be called the Thurston County Homeless System Provider Network (TCN). The TCN has decided to use Washington State HMIS. This allows programs in the community the ability to share information electronically with other TCN agencies about clients who have been entered into the system.

Client level information can only be shared between HMIS User Agencies who are a part of the TCN **Data Sharing Agreement** and have received written consent from clients agreeing to share their personal

information. The HMIS User receiving the written consent has the ability to “share” that client’s information electronically through the HMIS system with a collaborating HMIS User in the TCN.

This process can benefit clients by eliminating duplicate intakes. Demographic information, services provided and intake and exit interviews can be shared, between the collaborating agencies. By establishing this agreement, the TCN members each agree that within the confines of the Washington State HMIS:

1. HMIS information in either paper or electronic form will never be shared outside of the originating agency without client written consent except as required by law.
2. Information that is shared with written consent will not be used to harm or deny any services to a client.
3. It will not intentionally over-write data in the HMIS with information known to be inaccurate.
4. Any violation by an HMIS User Agency employee of the above requirements shall result in immediate disciplinary action from the agency as defined in the agency’s personnel policies.
5. It will abide by federal and state laws relating to the collection and use of HMIS data.
6. It will require all users of the HMIS system to sign a user agreement and abide by requirements described in User Policy and Code of Ethics prior to receiving HMIS access.
7. Information will be deleted from the system upon client request at each agency. The agency receiving the request will immediately notify the other agency.
8. Clients have the right to request information about who has viewed or updated their HMIS record.

The TCN establishes this interagency sharing agreement so that the agencies’ programs will have the ability to share client level information electronically through the Washington State HMIS. This agreement does not pertain to client level information that has not been entered into the HMIS. This electronic sharing capability only provides the programs with a tool to share client level information. This tool will only be used when all parties to this agreement have signed Agency Partner Agreements with the Department of Commerce and have completed security procedures regarding the protection and sharing of data as may be provided by law.

Limitation of Liability and Indemnification: No party to this Agreement shall assume any additional liability of any kind due to its execution of this agreement. It is the intent of the parties that each party shall remain liable, to the extent provided by law, for its own acts and omissions and the acts and omissions of its employees, volunteers, agents or contractors through participation in HMIS and that no party shall assume additional liability on its own behalf or liability for the acts of any other person or entity. The parties specifically agree that this agreement is for the benefit of the parties only and this agreement creates no rights in any third party.

Commerce shall not be held liable to any HMIS User Agency for any cessation, delay or interruption of services, or for any malfunction of hardware, software or equipment.

By signing this form, the TCN authorizes Commerce to allow data sharing through Washington State HMIS between said partner agencies.

Thurston County Homeless System Provider Network (TCN) agencies include:

Behavioral Health Resources	OlyMap
Capital Recovery Center	PANZA
Catholic Community Services (Thurston)	Partners in Prevention Education
Community Action Council of LMT (Thurston)	SafePlace
Community Youth Services (Thurston)	Salvation Army (Thurston)
City of Olympia	Shelton Youth Connection
Family Support Center of South Sound	SideWalk
Housing Authority of Thurston County	St. Michael Parish
Intercommunity Mercy Housing (Thurston)	Thurston County
InterfaithWorks	Union Gospel Mission (Olympia)
Low Income Housing Institute (Thurston)	VA Puget Sound Health Care System
Northwest Resources II Inc	

Appendix H: Thurston County Coordinated Entry Policies & Procedures

(added on next page)