

**NORTH SOUND BEHAVIORAL HEALTH ADMINISTRATIVE SERVICES ORGANIZATION, LLC  
(NORTH SOUND BH-ASO)  
CONTRACT AMENDMENT 2**

**CONTRACT ##NORTH SOUND BH-ASO-COMPASS CBRA-23**

Based on the Agreement of the parties to the above-referenced Contract between the North Sound Behavioral Health Administrative Services Organization, LLC (North Sound BH-ASO) and Compass Health (Provider) dated August 2, 2023, (as amended by North Sound BH-ASO and Provider dated April 25, 2024, collectively the "Contract") is hereby amended as follows:

The purpose of this amendment is to provide funding for July 1, 2024 to June 30, 2025:

By mutual agreement of the parties, the following language is added to the agreement:

- Replace *Exhibit B(a) - Compass Health CBRA Budget 24* with *Exhibit B(b) - Compass Health CBRA Budget*
- Replace *Exhibit C\_CBRA Guidelines SFY24* with *Exhibit C(a) – Community Behavioral Health Rental Assistance (CBRA) Guidelines SFY25*
- Replace *Exhibit D\_CBRA SFY24 Guidelines Change Document* with *Exhibit D(a) – Guidelines Changes SFY25*
- Replace *Exhibit E(a)\_Provider Deliverables* with *Exhibit E(b)\_Provider Deliverables*

ALL TERMS AND CONDITIONS OF CONTRACT SHALL REMAIN IN FULL FORCE AND EFFECT.

THIS AMENDMENT IS EXECUTED BY THE PERSONS SIGNING BELOW, WHO WARRANT THAT THEY HAVE THE AUTHORITY TO EXECUTE THIS AMENDMENT.

THIS AMENDMENT SHALL BECOME EFFECTIVE ON THE DATE OF FINAL SIGNATURE BY THE PARTIES.

**NORTH SOUND BH-ASO, LLC**

**COMPASS HEALTH**

\_\_\_\_\_  
JanRose Ottaway Martin                      Date  
Executive Director

\_\_\_\_\_  
Tom Sebastian                                      Date  
CEO

<b>North Sound Behavioral Health Administrative Services Organization DOC - CBRA Cost Reimbursement Budget Compass</b>			
<b>Annual Budget July 1, 2024 to June 30, 2025</b>			
<b>Revenues</b>			
	San Juan	Snohomish	Total
DOC Rental Assistance	\$ 11,880.00	\$ 438,545.00	\$ 450,425.00
DOC Program Operations	\$ 3,655.00	\$ 134,937.00	\$ 138,592.00
DOC Administration	\$ 2,742.00	\$ 101,203.00	\$ 103,945.00
SABG	\$ 25,000.00		\$ 25,000.00
<b>Total</b>	<b>\$ 43,277.00</b>	<b>\$ 674,685.00</b>	<b>\$ 717,962.00</b>
<b>Expenses</b>			
Rental Assistance	\$ 11,880.00	\$ 438,545.00	\$ 450,425.00
Operating Expense	\$ 3,655.00	\$ 134,937.00	\$ 138,592.00
Administration	\$ 2,742.00	\$ 101,203.00	\$ 103,945.00
Case Management	\$ 25,000.00	\$ -	\$ 25,000.00
<b>Total</b>	<b>\$ 43,277.00</b>	<b>\$ 674,685.00</b>	<b>\$ 717,962.00</b>
Budget Amount			\$ 717,962.00
Expenses			-
Balance			\$ 717,962.00

<b>North Sound Behavioral Health Administrative Services Organization Behavioral Health Housing / PROVISO 86 Cost Reimbursement Budget Compass Health</b>		
<b>Annual Budget July 1, 2024 to June 30, 2025</b>		
<b>Revenues</b>		
Behavioral Health Housing (Proviso 86)	\$	150,000.00
<b>Total</b>	<b>\$</b>	<b>150,000.00</b>
<b>Expenses</b>		
Behavioral Health Housing	\$	150,000.00
<b>Total</b>	<b>\$</b>	<b>150,000.00</b>
Budget Amount	\$	150,000.00
Expenses		-
<b>Balance</b>	<b>\$</b>	<b>150,000.00</b>



# **Guidelines**

FOR THE

# **Community Behavioral Health Rental Assistance Program (CBRA)**

**July 1, 2024 – June 30, 2025**

Version 1.0

July 2024

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## **1 Grant Basics**

### **1.1 Overview**

The Community Behavioral Health Rental Assistance program (CBRA) provides long-term or bridge rental subsidies for high-risk individuals with behavioral health conditions and their households. When partnered with programs offering supportive housing services such as Washington's Foundational Community Supports (FCS) program, Aging and Long-Term Supports (ALTS) programs, Housing and Recovery through Peer Services (HARPS) programs, or others, highly-vulnerable persons with complex behavioral health needs have opportunities to live independently in the communities of their choice.

### **1.2 Fund Source**

CBRA is funded by State General Funds as allocated by the Legislature.



## 2 Administrative Requirements

### 2.1 Grant Management

#### 2.1.1 Changes to Guidelines

The Department of Commerce, (Commerce), may revise the guidelines at any time. All lead grantees will be sent revised copies. Lead grantees are responsible for sending revisions to subgrantees, if any, in a timely manner.

#### 2.1.2 Commerce Monitoring

Commerce will monitor lead grantees' CBRA grant activities. Lead grantees will be given a minimum of 30 days' notice unless there are special circumstances that require immediate attention. The notice will specify the monitoring components.

#### 2.1.3 Discharge Planning Facilitation

Lead grantees are responsible to facilitate partnerships between discharge planners at state psychiatric hospitals and community-based psychiatric inpatient institutions and sub grantees to ensure priority populations are being served. Lead grantees should also facilitate partnerships between discharge planning staff at other behavioral health institutions to support referrals for those that are not part of the priority population but meet eligibility criteria.

#### 2.1.4 Subgrantee Management Requirements

Upon Commerce approval, lead grantees may enter into an agreement with any other nonprofit or governmental housing assistance organizations who operate programs to end homelessness within a defined service area. The CBRA Grant General Terms & Conditions Section 32 identifies subgrantee requirements. 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.

Lead Grantee Responsibilities are as follows:

- ✓ Lead grantees must maintain written procedures related to subcontracting as well as copies of all subcontracts and records related to subcontracts.
- ✓ Lead grantees must ensure that subcontracts bind subcontractors to follow all applicable terms of the original grant with Commerce and must include a term that COMMERCE and the State of Washington are not liable for claims or damages arising from a Subcontractor's performance of the subcontract.
- ✓ Lead grantees must provide Commerce with copies of subgrant agreements (upon request) and notify Commerce if subgrants are terminated during the grant period.
- ✓ Lead grantees must notify Commerce of any changes in selection of subgrantees funded with CBRA, or changes in the interventions of those subgrantees.

##### 2.1.4.1 Subgrantee Risk Assessment and Monitoring

Lead grantees are responsible for ensuring subgrantee compliance with all requirements identified in the CBRA guidelines. The lead grantee must maintain policies and procedures that guide the risk assessment, monitoring activities, and monitoring frequency.

The lead grantee must conduct a risk assessment and develop a monitoring plan for each subgrantee within six months of contracting CBRA funds 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.

Commerce reserves the right to require lead grantees to undertake special reviews when an audit or other emerging issue demands prompt intervention and/or investigation.

### **2.1.5 Leads Providing Exceptions to Guidelines**

CBRA leads may provide exceptions to certain aspects of the CBRA program guidelines as approved by Commerce. Leads must receive written approval from their Commerce Program Manager to approve a specific type of exception request. All exception requests must be processed according to procedures provided by Commerce and any applicable back-up documentation must be kept on file to support the decisions made.

## **2.2 Performance Measurement**

Performance Measures help evaluate the effectiveness of the Permanent Housing Subsidy programs. For more details, see [Appendix D: Performance Requirements](#).

Commerce has identified the following as the most critical performance measures for Permanent Housing Subsidy programs:

- ✓ Prioritizing those exiting, needing to exit, or exited from a state psychiatric hospitals and community psychiatric inpatient beds
- ✓ Increasing retention in the PHS program or exits to permanent housing

## **2.3 Reporting Requirements**

Upon request, grantees must submit accurate and complete information for the Annual County Expenditure Report to the Consolidated Homeless Grant Lead Contractor in the communities in which they serve.

Upon request, grantees will respond to requests for information by Commerce to facilitate legislative reporting and strategic distribution of funding.

## **2.4 Fiscal Administration**

### **2.4.1 Budget Caps**

Administration - up to 15% of total contracted budget may be used for administration. See [Section 4](#) for details on allowable expenses for Administration and Program Operations.

### **2.4.2 Reimbursements**

Lead grantees must bill Commerce monthly for reimbursement of allowable costs. Invoices are due on the 20<sup>th</sup> of the month following the billing period. Final invoices for a biennium may be due sooner than the 20<sup>th</sup>. If the lead grantee fails to submit an invoice within a three-month period, without a reasonable explanation, Commerce may take corrective action resulting in withholding of payment or reduction in contracted amount. Exceptions to billing procedures can be negotiated with Commerce on a case-by-case basis.

Invoices must be submitted online using the Commerce Contract Management System (CMS) via Secure Access Washington (SAW). Contact your Commerce representative for access to the online invoicing system.

#### **2.4.2.1 Reimbursement Back-up Documentation**

Requests for reimbursement must be accompanied by the [CBRA Monthly Voucher Detail Report](#) attached to the online invoice. Source documentation such as cancelled checks, purchase orders, or time

sheets are not required.

Commerce may require a lead grantee to submit additional documentation as needed to approve reimbursement. Lead grantees must retain original invoices submitted by their subgrantees.

#### **2.4.3 Budget Revisions**

Budget revisions that move more than 10 percent of the grant total require a budget amendment. The Administration budget cap must be maintained with each revision.

#### **2.4.4 Ineligible Use of Funds**

Grantees must inform Commerce if CBRA funds are spent on ineligible households or expenses. Reasonable attempts must be made to prevent ineligible use of funds.

## 3 Program Eligibility and Priority Populations

### 3.1 Priority Population

Grantees must prioritize households meeting eligibility criteria for the program that are discharging or needing to discharge or who have discharged from state psychiatric hospitals or community psychiatric inpatient beds within the past 12 months.

Households that meet eligibility criteria for the program that are not within the priority population may be served as long as the grantee has made a reasonable effort to ensure that individuals in the priority population have first access to available funds.

Upon approval from Commerce, CBRA grantees may set additional local prioritization criteria, based on community need, if the priority population above has been exhausted. Grantees using local prioritization criteria must produce and maintain a prioritization policy that includes a detailed explanation of all priority populations, criteria used to determine an individual is part of priority population, and how they will be prioritized.

### 3.2 Household Eligibility

#### 3.2.1 Eligibility Criteria:

A household is one or more individuals seeking to obtain or maintain housing together as a unit. A household does not include friends or family that are providing temporary housing. Participants, in consultation with the CBRA provider, should decide who is included in the household and who is not. Documentation in the client file should match the determination of household.

Eligible households must meet the income criteria for CBRA (Criteria One). At least one adult member of the household must also meet all three of the additional criteria below (Criteria Two through Four).

Criteria One		
Household Income is at or below 50% of area median income as defined by HUD. (See <a href="#">Section 3.2.2.4 Documentation of Household Income Eligibility</a> )		
<b>AND</b>		
<b>Criteria Two</b>		<b>Criteria Four</b>
Have a documented Behavioral Health Condition <sup>1</sup>	<b>AND</b>	Eligible for a long-term support services program (see <a href="#">Appendix C</a> )*
		<b>AND</b>
		Have a documented need for long-term housing subsidy with no other suitable <sup>2</sup> resource that can meet the long-term subsidy need.

\*Please note, individuals that would otherwise be eligible for a long-term support service program but are not due to citizenship status meet the criteria for Criteria Three.

<sup>[1]</sup> A Behavioral Health Condition is a mental health condition or substance use disorder that impairs an individual's capacity to address normal activities of daily living, and is expected to be of long duration.

<sup>[2]</sup> A suitable resource is one that meets the housing needs of the participant, is rooted in participant choice, and does not cause undue hardship to the participant.

### 3.2.2 Documentation of Eligibility

Grantees must document eligibility for the household. The [CBRA Verification of Household Eligibility Form](#) and all applicable documentation (see below) is to be kept in the client file and dated within 45 days of program entry.

For a list of all required client file information and documentation see [Appendix B: Client File Information and Documentation](#).

#### 3.2.2.1 Documentation of a Behavioral Health Condition

Grantees must verify and document a behavioral health condition for at least one adult member of the household prior to program entry.

**Behavioral health conditions** are mental health conditions or substance use disorders that impair an individual's capacity to address normal activities of daily living, and are expected to be of long duration.

Acceptable documentation includes one of the following:

- ✓ Written verification from a medical or behavioral health professional or social worker.
- ✓ Written verification from the Social Security Administration, the Department of Social and Health Services, the Veterans Administration, or other state or federal departments that determine the presence of a behavioral health disability for program or services eligibility.
- ✓ Written verification from HARPS, the Foundational Community Supports Program, or other long-term supportive services programs that have previously determined the presence of a behavioral health disability for program or service eligibility.
- ✓ Written self-attestation from the individual or statement from immediate family member. This method is to be used only if no other documentation method is available. Case manager must indicate why no other documentation is available.
- ✓ Other documentation as approved by Commerce.

#### 3.2.2.2 Documentation of Eligibility for Long-Term Supportive Services

Grantees must document eligibility for at least one long-term supportive services program that meets the criteria listed in [Appendix C for a description of Eligible Long-term supports programs](#) prior to program entry. In situations where the eligible participant would be eligible for long-term supportive services except for citizenship status, this should be documented in the client file.

Acceptable documentation includes one of the following:

- ✓ Written verification of eligibility from an approved long-term supports program.
- ✓ Written verification from a case manager that certifies that they confirmed eligibility for a long-term supportive services program.
- ✓ Written verification of ineligibility based solely on citizenship status from an approved long-term supports program provider.
- ✓ Written verification of ineligibility based on client's choice to not currently engage with offered services.

#### 3.2.2.3 Documentation of Long-term Subsidy Need

Grantees must provide documentation that certifies that a housing planning conversation was completed with the participant in which the case manager or program staff determined that there is

a need for long-term housing subsidy with no other suitable resource that can meet the long-term subsidy need. The [CBRA Certification of Long-Term Housing Support Need](#) form can be used to collect a statement from a qualified party (see below). Any type of written statement signed and dated within 45 days of program enrollment by the qualified party can be used as documentation.

Acceptable documentation includes one of the following:

- ✓ Statement from a Case Manager or CBRA provider staff verifying that a housing planning conversation was completed and that there is a need for long-term housing support without another suitable resource to meet the need.
- ✓ Statement from a medical or behavioral health professional or social worker verifying that a housing planning conversation was completed and that there is a need for long-term housing support without another suitable resource to meet the need.
- ✓ Statement from a discharge professional verifying that a housing planning conversation was completed and that there is a need for long-term housing support without another suitable resource to meet the need.

\*A suitable resource is one that meets the housing needs of the participant, is rooted in participant choice, and does not cause undue hardship to the participant.

#### 3.2.2.4 Documentation of Household Income Eligibility

CBRA providers must verify and document income eligibility at program enrollment. [CBRA Income Eligibility Worksheet](#) (or equivalent) and all allowable income documentation ([See Appendix G](#)) must be kept in the client file.

See section 3.2.3 below for more information about how to calculate combined household income.

#### 3.2.3 Determination of Income Eligibility

For a household to be eligible for the CBRA program the combined household income must not exceed 50% of area median gross income as defined by HUD.

Area Median Income (AMI) Limits can be located for each county at: [www.huduser.gov](http://www.huduser.gov) (Data Sets, Income Limits).

Income is money that is paid to, or on behalf of, any household member. Income includes the current gross income (annualized) of all adult (18 years and older) household members and unearned income attributable to a minor. Income eligibility determinations are based on the household's income at program enrollment. Income inclusions and exclusions are listed in the Electronic Code of Federal Regulations, [www.ecfr.gov](http://www.ecfr.gov), Title 24 – Housing and Urban Development: Subtitle A 0-99: Part 5: Subpart F: Section [5.609 Annual Income](#).

**Gross Income** is the amount of income earned before any deductions (such as taxes and health insurance premiums) are made.

**Current Income** is the income that the household is currently receiving. Income recently terminated should not be included.

##### 3.2.3.1 Annualizing Wages and Periodic Payments

Use the [CBRA Income Eligibility Worksheet](#) (or equivalent) to calculate income based on hourly, weekly, or monthly payment information. Add the gross amount earned in each payment period

that is documented and divide by the number of payment periods. This provides an average wage per payment period. Depending on the schedule of payments, use the following calculations convert the average wage into annual income:

- ✓ Hourly wage multiplied by hours worked per week multiplied by 52 weeks.
- ✓ Weekly wage multiplied by 52 weeks.
- ✓ Bi-weekly (every other week) wage multiplied by 26 bi-weekly periods.
- ✓ Semi-monthly wage (twice a month) multiplied by 24 semi-monthly periods.
- ✓ Monthly wage multiplied by 12 months.

### **3.3 Eligibility Recertification**

Eligibility criteria must be reviewed annually for households enrolled in CBRA to determine whether the household remains eligible for the program.

#### **3.3.1 Documentation of Recertification of Eligibility**

Grantees must provide the [CBRA Eligibility Recertification checklist](#) form with the final determination of eligibility and documentation to support the determination in the client file. Documentation must be dated within 45 days of recertification date.

##### **3.3.1.1 Documentation of Lack of Change in Behavioral Health Condition Status**

If a household's Behavioral health condition continues to impair capacity to address normal activities of daily living, and is expected to be of long duration, this should be indicated on the [CBRA Eligibility Recertification checklist](#) and no additional documentation is needed. In the case that behavioral health condition status has changed, the grantee should provide documentation that led them to determine this change in status. See [3.2.2.1 Documentation of a Behavioral Health Condition](#) for appropriate documentation standards.

##### **3.3.1.2 Documentation of Long-Term Supportive Service Need and Availability**

At recertification, grantees must reassess the need and availability of supportive services for participants. Documentation that shows that program staff discussed supportive service needs, availability, and eligibility with the participant and an outline that documents the steps that will be taken to pair the participant with appropriate services must be kept in the client file.

Acceptable documentation includes one of the following:

- ✓ Statement from a Case Manager or CBRA provider staff verifying that reassessment of need for services was completed along with an outline of any steps that will be taken to pair the participant with appropriate services.
- ✓ Statement from a long-term supportive services case manager or staff person verifying that reassessment of need for services was completed along with an outline of any steps that will be taken to pair the participant with appropriate services.

##### **3.3.1.3 Documentation of Continued Long-term Subsidy Need**

At recertification, grantees must provide documentation certifying that a housing planning conversation was completed within the last 45 days and that the participant's need for long-term housing support continues. See section [3.2.1.3 Documentation of Long-term Support Need and Lack of Resources and Supports](#) for appropriate documentation standards.

#### **3.3.1.4 Documentation of Income Eligibility at Recertification**

Lead/subgrantee must verify and document income eligibility at recertification.

[CBRA Income Eligibility Worksheet](#) (or equivalent) and all allowable income documentation ([See Appendix G](#)) must be kept in the client file. See section 3.2.3 for more information about how to calculate combined household income.

#### **3.3.2 Ineligible at Recertification**

If a household is determined ineligible at recertification, grantees have the option of providing up to six additional months of rental subsidy to support the household to transition to self-sufficiency. The decision to provide additional rental subsidy of up to 6 months must be noted in the client file.



## 4 Eligible Activities and Costs

The primary activity of this program is payment of a Permanent Housing rent subsidy to a landlord on behalf of an eligible household. A comprehensive guide of eligible activities and costs to support the primary activity is found below.

### 4.1 Administration

Allowable administrative costs benefit the organization as a whole and cannot be attributed specifically to a particular program. Up to 15 percent of total contracted budget may be used for administration.

Administrative costs may include the same types of expenses that are listed in program operations (such as IT staff and office supplies), in the case that these costs are benefiting the agency as a whole and are not attributed to a particular program, they are considered administrative. Administrative costs may include, but are not limited to, the following:

- ✓ Executive director salary and benefits.
- ✓ General organization insurance.
- ✓ Organization wide audits.
- ✓ Board expenses.
- ✓ Organization-wide membership fees and dues.
- ✓ General agency facilities costs (including those associated with executive positions) such as rent, depreciation expenses, and operations and maintenance.

All amounts billed to administration must be supported by actual costs, or portions of actual costs. These costs must be charged to grant cost centers by one of the following three methods:

- ✓ Billed directly such as IT services that are billed by the hour.
- ✓ Shared costs that are allocated directly by means of a cost allocation plan.
- ✓ Costs related to executive personnel such that a direct relationship between the cost and the benefit cannot be established must be charged indirectly by use of an indirect cost rate which has been appropriately negotiated with an approved cognizant agency or by use of the 10 percent de minimus rate.

### 4.2 Operations

Operations expenses are directly attributable to a particular program and include:

- ✓ Salaries and benefits for staff costs directly attributable to the program, including but not limited to program staff, information technology (IT) staff, human resources (HR) staff, bookkeeping staff, and accounting staff.
- ✓ Office space, utilities, supplies, equipment (up to \$1,500 per grant period unless approved in advance by Commerce), telephone, internet, and training/conferences/travel and per diem.
- ✓ Data collection and entry.
- ✓ Housing search and placement.
- ✓ Eligibility determination and recertification activities.

### 4.3 Housing Costs

Eligible housing costs must be paid directly to a third party on behalf of the household. Rent payments may not be made directly to the eligible household. Please note, Commerce expects that, when other

short-term subsidies are available for emergency housing, securing housing costs, and move-in costs, that these subsidies are used before CBRA funds.

#### **4.3.1 Emergency Housing**

Funds may be used to provide emergency housing for no more than 90 days when no suitable\* shelter bed is available and program staff support the grantee with permanent housing search. \*\*

Emergency Housing Includes:

- ✓ Hotel/Motel Stays
- ✓ Transitional Housing that does not require the participant to maintain a lease for a specific period of time.
- ✓ Recovery residences
- ✓ Other, as approved by Commerce.

\* A suitable shelter bed is one that meets the emergency housing needs of the participant, is rooted in participant choice, and does not cause undue hardship to the participant.

\*\*Please note, short-term rental agreements and walk-through inspections are encouraged for hotel/motel stays if owners wish to access landlord reimbursement programs like the Landlord Mitigation Program.

#### **4.3.2 Securing Housing**

- ✓ Costs for securing permanent housing including: application fees, background check fees, credit check fees, and other related costs for securing permanent housing.
- ✓ Rental arrears and associated late fees for up to three months. Rental arrears may be paid if the payment enables the household to obtain or maintain permanent housing.
- ✓ Past evictions and associated fees that prevent the participant from obtaining housing may be paid in an amount up to \$3000.
- ✓ Up to three months of utility arrears and associated fees may be paid on behalf of the tenant if this enables the household to obtain or maintain permanent housing.

#### **4.3.3 Move-In Costs**

- ✓ Security deposits for households moving into new units.
- ✓ Utility deposits for a household moving into a new unit.
- ✓ Incentives paid to landlords
- ✓ First and Last Months' Rent

#### **4.3.4 Rent and Associated Costs**

- ✓ Monthly rent. Rent may only be paid one month at a time, although rental arrears, pro-rated rent, and last month's rent may be included with the first month's payment.
- ✓ Master-lease: security deposit and monthly rent is allowable when an organization master-leases a unit, and then sub-leases it to CBRA-eligible households. Tenants must have a sublease with the master lease holder.
- ✓ Utilities which are included in rent.
- ✓ Renter's insurance
- ✓ Costs of parking spaces when connected to a unit.

#### 4.3.5 Other Housing Costs

- ✓ Utility payments for households also receiving rental assistance.
- ✓ Other costs as approved by Commerce.

#### 4.3.6 Special Circumstances

- ✓ Funds may be used to pay for storage of personal belongings if there are no other suitable storage options available while a permanent housing search is conducted.
- ✓ Temporary absence: if a household must be temporarily away from the unit, but is expected to return (such as temporary incarceration, hospitalization, or residential treatment), grantees may pay for the household's rent for up to 60 days and charge the grant for eligible costs. Any temporary absence must be documented in the client file. Extensions to the 60 day limit must be approved by Commerce.
- ✓ Internet included as a utility cost: Commerce will consider including internet as a utility cost if all other resources have been exhausted and it is determined that lack of internet coverage will be detrimental to the client securing or maintaining housing. All resources must be documented and presented to Commerce upon the request for an exception.
- ✓ Moving costs: Commerce will consider allowing moving costs under special circumstances as long as all other resources have been exhausted and those resources are documented and provided to Commerce upon the request for an exception.

#### 4.4 Ineligible Expenses

- ☒ Cable television deposits or services.
- ☒ Mortgage assistance and utility assistance for homeowners.
- ☒ Security and janitorial (salaries and benefits associated with providing security, janitorial services).
- ☒ Essential facility equipment and supplies (e.g. common-use toiletries, food served in shelters, bedding, mats, cots, towels, microwave, etc.)
- ☒ Expendable transportation costs directly related to the transportation of eligible households (bus tokens and fuel for a shelter van).
- ☒ On-site and off-site management costs related to the building.
- ☒ Facility-specific insurance and accounting.
- ☒ Replacement or operating reserves.
- ☒ Debt service.
- ☒ Construction or rehabilitation of facilities.
- ☒ Mortgage payment for a facility.

## 5 Requirements for Providing Permanent Housing Subsidy (PHS)

Permanent Housing Subsidy (PHS) is a rental subsidy with no time limit for households with behavioral health conditions in need of long-term housing assistance. PHS includes the availability of support services and may be provided as a scattered-site or master-leased model.

PHS has the following characteristics:

- ✓ **Permanent Housing-** A lease or rental agreement between the landlord and tenant is required (see [5.3.2 Lease or Rental Agreement](#) for conditions of lease and rental agreements) and eligible households may stay in their housing indefinitely as long as they meet the basic obligations of tenancy as called out in the lease or rental agreement.
- ✓ **Permanent or Long-Term Eligibility-** Services and the housing subsidy are available permanently as long as the household remains eligible. If a household loses eligibility for a long-term supports program, they can retain their eligibility for PHS as long as they meet basic criteria (see [3.3 Determination of Income Eligibility at Recertification](#)).
- ✓ **Voluntary Support Services-** Support services are available to clients but participation is voluntary.

### 5.1 Referrals and Use of Coordinated Entry

Referrals for the CBRA program may come from a variety of sources. To support effective referrals for the priority population, grantees and program staff must actively create and maintain relationships and regularly coordinate with discharge planners at state psychiatric hospitals and community-based inpatient psychiatric treatment facilities to ensure priority populations are served.

To maintain referrals for individuals that may not fall into the priority population but are still eligible for the CBRA program, relationships should also be cultivated and maintained with community-based substance use and other treatment institutions, correctional institutions, the local coordinated entry system, and other providers that work with these populations.

The CBRA program is not required to participate in the local coordinated entry process but is encouraged to partner with their local coordinated entry organization for referrals and collaboration.

Grantees or their subgrantees must maintain policies and procedures around how referrals will be cultivated, accepted, and prioritized within their community. MOUs or other written documentation of referral partnerships are encouraged but not required.

For CBRA program prioritization requirements, see section [3.1 Priority Population](#)

### 5.2 Service Delivery

Commerce promotes evidence-based program delivery models that align with best practices for providing permanent supportive housing and permanent housing subsidy. The following requirements apply to grantees and subgrantees that deliver PHS.

#### 5.2.1 Permanent Supportive Housing Core Elements

Grantees should adhere to the core elements of Permanent Supportive Housing, as applicable, when administering Permanent Housing Subsidy. For more information, visit the [Substance Abuse and Mental Health Services Administration \(SAMHSA\) Permanent Supportive Housing Evidence-Based Practices Kit](#).

### 5.2.2 Housing First

Programs must be operated in accordance with Housing First principles. For detail on Housing First, see the [National Alliance to End Homelessness's webpage](#) on the topic.

### 5.2.3 Voluntary Services

Grantees must not terminate or deny services to households based on a household's refusal to participate in supportive services. Supportive services are intensive services aimed at helping a person obtain and maintain housing. Supportive Housing providers work in partnership with various community entities to provide wrap around support, such as mental health services, alcohol and substance abuse services, long term care services, life skills or independent living skills services and vocational services. These services are not billable to CBRA, but are allowable expenses under the FCS program or other supportive services programs.

## 5.3 Ongoing Program and Staff Development

Commerce highly encourages grantees/subgrantees to participate in ongoing program and staff development opportunities to improve person-centered, culturally competent practices designed to improve the experiences of those facing the greatest impacts of housing instability and homelessness. The following trainings/opportunities are recommended:

- ✓ Crisis intervention
- ✓ Racial Equity
- ✓ Cultural competency
- ✓ LGBTQ+ competency
- ✓ Introduction to person-centered care
- ✓ Trauma Informed Care
- ✓ Mental health First Aid
- ✓ Training on the SAMHSA Model of Permanent supportive housing
- ✓ Motivational Interviewing
- ✓ Supporting survivors of intimate partner violence and child abuse
- ✓ Supporting special needs populations with co-occurring behavioral health conditions (including IDD, cognitive impairments, and TBIs)
- ✓ Fair Housing
- ✓ Housing First
- ✓ Progressive Engagement and Problem-Solving (Diversion)
- ✓ Professional boundaries
- ✓ Trainings on handling secondary or vicarious trauma and professional burnout
- ✓ Program evaluation and fidelity training

In addition, lead/subgrantee staff are highly encouraged to attend the annual Washington State Conference on Ending Homelessness and other professional conferences on behavioral health and housing.

### 5.3.1 Emergency Housing

Emergency housing is a short-term housing situation (90 days or less) that offers immediate shelter when no suitable shelter bed is available. These emergency housing situations are typically in hotels, motels, transitional housing projects, or recovery residences but other situations may be approved on a case-by-case basis. Housing search support must be provided by the grantee while a participant

is placed in an emergency housing situation.

Emergency housing situations do not require a lease, habitability, or lead-based paint inspections. Participants are not required to pay rent while in emergency housing situations. HMIS data entry is required for participants served in emergency housing.

\* A suitable shelter bed is one that meets the emergency housing needs of the participant, is rooted in participant choice, and does not cause undue hardship to the participant.

### **5.3.2 Lease or Rental Agreements**

A lease or rental agreement between the eligible household and the landlord must be executed at the time of payment of rental assistance. Leases or rental agreements must contain standard lease provisions as shown in [5.3.2.1 Lease or Rental Agreement](#).

The lease or rental agreement and any subsequent leases or rental agreements must be kept in the client file.

#### **5.3.2.1 Lease or Rental Agreement Requirements**

At a minimum, the lease or rental agreement between the landlord and the eligible household must contain the following:

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

### **5.3.3 Master Leasing**

Grantees can utilize master leasing when providing PHS for a participant. Master leasing is when an organization secures a lease directly with a landlord and then sub-leases the unit to a CBRA eligible household. The master-lease holder must have a sub-lease with the CBRA eligible household to provide the subsidy.

### **5.3.4 Determining Allowable Rent Amounts**

Grantees determine the amount of rent that can be charged for a unit based on the rent limit or rent reasonableness.

#### **5.3.4.1 Rent Limit**

The rent limit is the maximum rent that can be paid for a unit of a given size which must not exceed 150 percent of [HUD's Fair Market Rent](#) (FMR). Rent calculations must include the cost of utilities as detailed on utility allowance schedules established by [the local Housing Authority](#).

Payment of rents in excess of 150 percent of FMR requires prior approval by Commerce.

#### 5.3.4.2 Rent Reasonableness

Rent reasonableness means the total rent charged for a unit must be reasonable in relation to the rents being charged during the same time period for comparable, non-luxury units in the private unassisted market.

Rent reasonableness is performed by one of the following

- ✓ Performing a rental market analysis/study in the rental market where the rental is located in. The market analysis/study must be performed, at a minimum, annually and no more than quarterly.
- ✓ Reviewing comparable units advertised for rent as detailed below

When determining rent reasonableness, grantees must consider the following characteristics of the units to ensure they are comparable: location, quality, size, type, amenities, housing services, maintenance, and utilities included in the rent. Though units may have different features, they should be relatively comparable in based on their characteristics and amenities.

*For example, one rental may be slightly larger but does not include utilities in the rent. The slightly smaller rental with utilities included could be comparable in value and used to determine rent reasonableness.*

Verification that the rent charged for this units do not exceed rents charged for other comparable units owned (for example, the landlord would document the rents paid in other units).

Grantees must document rent reasonableness using the [Rent Reasonableness Worksheet](#) and attach all applicable backup documentation.

For more information, see HUD's guide at: <https://files.hudexchange.info/resources/documents/CoC-Rent-Reasonableness-and-FMR.pdf>.

#### 5.3.5 Determining Rent Subsidy

Consistent with [HUD housing affordability standards](#), each household is responsible for contributing no more than 30 percent of their income to the cost of their housing<sup>3</sup>. Documentation of subsidy amount and subsidy determination process must be included in the client file.

If the household share creates a burden for the household, the household share may be waived or reduced, at the discretion of the grantee. The circumstances of the waiver must be documented in the client file.

Grantees must review and adjust household rent subsidy amount annually. Documentation of new subsidy determination process and subsidy amount must be included in the client file.

#### 5.3.6 Habitability

Grantees are responsible for documenting habitability for all housing units into which households will be moving, except where a household moves in with friends or family. Housing units must be documented as habitable prior to paying the rent subsidy and following a habitability complaint

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<sup>3</sup>Cost of housing is equal to the tenant's share of the rent plus utilities including electricity, natural gas, propane (if needed for cooking or laundry), water, sewer, and garbage services the tenant must pay.

made by the tenant or a third party.

If a client is moving in with family or friends and a habitability inspection is not completed, the tenant will still need to sign the form after notes have been made stating the reason for not completing the inspection and placed in the client file.

If a client is living in a trailer/RV, a Habitability Inspection must be performed and both must pass the Inspection in order for the client to receive CBRA funding.

#### **5.3.6.1 Allowable Methods for Unit Habitability Determination**

Habitability can be documented by the Landlord Habitability Standards Certification Form or inspection. If the housing unit is provided to a different household within 12 months of documented habitability, an additional certification/inspection is not required. One of the following methods must be applied to each subsidized unit:

- ✓ The [CBRA Landlord Habitability Standards Certification Form](#) references the state Landlord Tenant Act (RCW 59.18.060) and requires the landlord (as defined in RCW 59.18.030) to certify that the unit meets the safety and habitability standards detailed in the law. The landlord's failure to comply with the law may result in termination of the rent subsidy.

**OR**

- ✓ Inspections: in lieu of (or in addition to) the above landlord certification, grantees may choose to inspect all or some housing units. Grantees may use the [Commerce Housing Habitability Standards \(HHS\)](#) form or the HUD [Housing Quality Standards \(HQS\) Inspection](#) form.

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

#### **5.3.6.2 Habitability Recertification**

Grantees must document recertification of habitability upon complaint of the habitability condition of the unit by the tenant or a third party. (See [5.3.6.1 Allowable Methods for Unit Habitability Determination](#)). Documentation of habitability recertification must be kept in the client file. (See Section 5.3.6 for clients living with family or friends.)

#### **5.3.6.3 Habitability Complaint Procedure**

Each household must be informed in writing of the habitability complaint process and assured that complaints regarding their housing unit's safety and habitability will not affect the household's program eligibility. Households must be informed at the time of move-in or, if they are already living in the unit, at the time of program enrollment.

Each landlord must be informed in writing of the habitability complaint process and that subsidy payments to landlords may be terminated if landlords fail to resolve habitability issues according to the Washington State Landlord-Tenant Act ([RCW 59.18](#)). Landlords must be informed prior to participant move-in, or, if they are already living in the unit, at the time of program enrollment.

Lead/subgrantees must have a written procedure describing the response to complaints regarding unit safety and habitability. The procedure must include:



- ✓ Mandatory inspection when a complaint is reported using the HHS Form, HQS Inspection Form, or documenting the specific complaint in an alternate format that includes follow-up and resolution.
- ✓ Actions that will be taken to ensure habitability is restored and steps that may lead to termination of payment to a landlord if they fail to restore habitability according to the [Washington Landlord-Tenant Act \(RCW 59.18\)](#).

### 5.3.7 Lead Based Paint Assessment

The grantee must ensure that a lead-based paint visual assessment is completed prior to payment of a permanent housing subsidy if a child under the age of six or pregnant woman resides in a unit constructed prior to 1978. This form must be completed in all living situations, including if living in a trailer or RV.

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

A visual assessment must be conducted upon request from the tenant. Visual assessments must be conducted by a [HUD-Certified Visual Assessor](#) and must be documented on the HQS Inspection Form or HHS Form and maintained in the client file.

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

#### 5.3.7.1 Exceptions to the 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 Part 35.115(a).

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

### 5.3.8 Washington Residential Landlord-Tenant Act

Grantees 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 [www.washingtonlawhelp.com](http://www.washingtonlawhelp.com).

## 5.4 HMIS

Lead/subgrantees providing direct service must enter client data into the Homeless Management Information System (HMIS) in accordance with the most current [HUD HMIS Data Standards](#).

**Balance of State Grantees only:** For assistance with a HMIS related question or issue, submit a ticket through Commerce's [HMIS Helpdesk Form](#). Please visit the Commerce HMIS [website](#) for forms, information on training, past newsletters and additional HMIS related resources. Balance of State CoC Grantees must adhere to the [Agency Partner Agreement](#). All grantees and subgrantees entering data into the HMIS system must sign and comply with the terms of the Agency Partnership Agreement

**Non-Balance of State Grantees only:** For assistance, contact your CoC's HMIS system administrator.

Counties not using the State HMIS (data integration counties), must work with the HMIS Manager to provide full CSV exports every three months/quarterly. When Commerce is able to accept monthly imports, counties must upload data to the State's HMIS using XML or CSV schema compliant with current HUD HMIS Data Standards. Uploads must occur no later than the 30th calendar day following the end of each month. Counties not able to export and upload data to the State HMIS using an approved format must use the State HMIS for direct data entry.

### 5.4.1 Data Quality

Data quality is reviewed quarterly and will be scored annually. Grantees and subgrantees are required to provide quality data to the best of their ability. For more information on data quality requirements and expectations, see [Appendix E: Data Quality](#).

### 5.4.2 Consent for Entry of Personally Identifying Information

Clients whose identifying data are entered into HMIS may only be done by written consent of the client.

#### 5.4.2.1 Identified Records

- ✓ Personally identifying information (PII)<sup>4</sup> must not be entered into HMIS unless all adult household members have provided informed consent.
- ✓ 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, note this on the consent form and then complete the consent form the first time the household is seen in person. See [Agency Partner HMIS Agreement](#).

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<sup>4</sup> PII includes name, social security number, birthdate, address, phone number, email, and photo.

#### 5.4.2.2 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.
- ✓ Households in programs which are required by funders to report HIV/AIDS status.

#### 5.4.2.3 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.

### 5.5 Additional Requirements

#### 5.5.1 Grievance Procedure

Grantees must have a written grievance procedure for households seeking or receiving subsidies which includes the household's right to review decisions and present concerns to program staff not involved in the grievance.

This procedure must:

- ✓ Clearly describe how households can request a review or report concerns.
- ✓ Be accessible to all households seeking or receiving subsidies

#### 5.5.2 Termination and Denial of Service Policy

Grantees must have a termination and denial policy.

This policy must:

- ✓ Include the following reasons a household could be denied subsidies and/or terminated from program participation.

##### **Denial Reasons:**

- Does not meet CBRA eligibility requirements
- A lack of availability or funding needed to admit a new client onto the CBRA program.  
Applicants will be notified of their option to be placed on the waitlist

##### **Termination Reasons:**

- A confirmed permanent or long-term absence from their unit
- Relocate to a service area agency does not provide CBRA subsidy
- Is no longer eligible at recertification\*
- Requests that subsidies are terminated
- Harmful behaviors that jeopardize the safety of staff or others after all appropriate efforts have been made by staff to resolve the issues. Efforts must be documented and should be reviewed with the lead grantee prior to termination
- Evidence to fraud or attempts to fraud have been confirmed

- ✓ Describe the notification process.
- ✓ Ensure households are made aware of the grievance and termination procedure.
- ✓ Describe the rights of the participant to appeal grievance and termination decisions including contact information and timeframes appeals must be submitted.

\* see section [3.3.2 Ineligible at Recertification](#) on 6 month additional subsidy

#### **5.5.3 Records Maintenance and Destruction**

Grantees must maintain records relating to this grant for a period of six years following the date of final payment. See CBRA Grant General Terms and Conditions, Section 26 RECORDS MAINTENANCE.

Paper records derived from HMIS which contain personally identifying information must be destroyed within seven years after the last day the household received services from the lead/subgrantee.

#### **5.5.4 Prohibitions**

- ✓ Lead/subgrantee may not require households to participate in a religious service as a condition of receiving program assistance.
- ✓ If a program serves households with children, the age of a minor child cannot be used as a basis for denying any household's admission to the program.
- ✓ If a program serves households with children, the program must serve all family compositions.

#### **5.5.5 Nondiscrimination**

As stated in the CBRA Grant General Terms and Conditions Section 9 and Section 22, grantees must comply with all federal, state, and local nondiscrimination laws, regulations and policies.

Grantees must comply with the Washington State Law against Discrimination, [RCW 49.60](#), as it now reads or as it may be amended. [RCW 49.60](#) currently prohibits discrimination or unfair practices because of race, creed, color, national origin, families with children, sex, marital status, sexual orientation, age, honorably discharged veteran or military status, or the presence of any sensory, mental, or physical disability or the use of a trained guide dog or service animal by a person with a disability.

Grantees must comply with the [Federal Fair Housing Act](#) and its amendments as it now reads or as it may be amended. The Fair Housing Act currently prohibits discrimination because of race, color, national origin, religion, sex, disability or family status. The Fair Housing Act prohibits enforcing a neutral rule or policy that has a disproportionately adverse effect on a protected class.

Local nondiscrimination laws may include additional protected classes.

## **6 Washington State 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](#).

## 7 Appendices

### 7.1 Appendix A: Required Policies and Procedures

Policies and Procedures
<ul style="list-style-type: none"><li>✓ Subcontracting policies and procedures (section <a href="#">2.1.4</a>)</li><li>✓ Referral policies and procedures (section <a href="#">5.1</a>)</li><li>✓ Habitability Complaint Procedure (section <a href="#">5.3.6.3</a>)</li><li>✓ Grievance Procedure (section <a href="#">5.5.1</a>)</li><li>✓ Termination or Denial of Service Policy (section <a href="#">5.5.2</a>)</li><li>✓ Prioritization Policy, if applicable (<a href="#">section 3.1</a>)</li></ul>

## 7.2 Appendix B: Client File Information and Documentation

The following chart summarizes the information and documentation required in each client file. Other documentation may be required based on individual circumstances.

Forms marked with an asterisk (\*) indicate a specific form required by CBRA to meet the documentation requirement. Required forms may be modified as long as all content is included.

Up-to-date versions of all required and recommended forms can be found on the Commerce Permanent Housing Subsidy [webpage](#).

Required Documentation	
✓	* <a href="#">CBRA Client File Checklist</a>
✓	* <a href="#">HMIS Client Release of Information and Informed Consent</a> Form signed by all adult household members (unless DV <u>OR</u> client refuses consent) (section <a href="#">5.4.2</a> )
✓	* <a href="#">CBRA Verification of Eligibility Checklist</a> Form with applicable documentation attached (section <a href="#">3.2.2</a> )
✓	* <a href="#">CBRA Verification of Recertification</a> with applicable documentation attached, <i>as needed</i> (section <a href="#">3.3.1</a> )
✓	<a href="#">CBRA Income Eligibility Worksheet</a> , <i>as needed for recertification</i> (section <a href="#">3.3.1</a> )
✓	* <a href="#">Landlord Habitability Certification</a> or * <a href="#">HHS</a> or * <a href="#">HQS</a> (section <a href="#">5.3.6</a> )
✓	Lead-based Paint Assessment, if applicable (section <a href="#">5.3.7</a> , <a href="#">Appendix F</a> )
✓	Executed Lease <u>or</u> Rental Agreement (section <a href="#">5.3.2</a> )
✓	Household Rent subsidy amount / Rent determination process (section <a href="#">5.3.4</a> )
Required Information	
✓	Dates and Circumstances of temporary absence to an institution (section <a href="#">4.3.6</a> )
Other Recommended Forms	
✓	<a href="#">CBRA Certification of Long-Term Housing Support Need</a> (section <a href="#">3.2.2.3</a> )
✓	<a href="#">Rent Calculation Worksheet</a> (Section <a href="#">5.3.5</a> )
✓	<a href="#">Rent Reasonableness Worksheet</a> (Section <a href="#">5.3.4.2</a> )
✓	Move in/Move out condition report (section <a href="#">6</a> )

### 7.3 Appendix C: Eligible Long-Term Supports Programs

Long-term supportive services are voluntary, person-centered services that pair with CBRA subsidies to help individuals with behavioral health conditions live with maximum independence in community-integrated housing. Supportive services programs should make available the pre-tenancy and tenancy sustaining services listed below based on the need of the client. Programs that do so may be considered long-term supportive services programs that can provide documentation of eligibility in order to meet [Eligibility Criteria Three](#) for the CBRA program. Please note, the long-term supportive services provider can change during a household's participation in CBRA.

#### Pre-tenancy supports

- ✓ Conducting a functional needs assessment identifying the enrollee's preferences related to housing (e.g., type, location, living alone or with someone else, identifying a roommate, accommodations needed, or other important preferences) and needs for support to maintain community integration (including what type of setting works best for the enrollee), assistance in budgeting for housing/living expenses, assistance in connecting the individual with social services to assist with filling out applications and submitting appropriate documentation in order to obtain sources of income necessary for community living and establishing credit, and in understanding and meeting obligations of tenancy
- ✓ Assisting individuals to connect with social services to help with finding and applying for housing necessary to support the individual in meeting their medical care needs
- ✓ Developing an individualized community integration plan based on the functional needs assessment as part of the overall person-centered plan
- ✓ Identifying and establishing short and long-term measurable goal(s), how goals will be achieved, and how concerns will be addressed
- ✓ Person-centered planning meetings at redetermination and/or revision plan meetings, as needed
- ✓ Providing supports and interventions per the person-centered plan

#### Tenancy Sustaining Services

- ✓ Providing service-planning support and participating in person-centered plan meetings at redetermination and/or revision plan meetings as needed
- ✓ Coordinating and linking the recipient to services including primary care and health homes; substance use treatment providers; mental health providers; medical, vision, nutritional and dental providers; vocational, education, employment and volunteer supports; hospitals and emergency rooms; probation and parole; crisis services; end of life planning; and other support groups and natural supports
- ✓ Providing entitlement assistance including obtaining documentation, navigating and monitoring the application process, and coordinating with the entitlement agency
- ✓ Assisting with accessing supports to preserve the most independent living, such as individual and family counseling, support groups, and natural supports
- ✓ Providing supports to assist the individual in the development of independent living skills, such as skills coaching, financial counseling and anger management
- ✓ Providing supports to assist the individual in communicating with the landlord and/or property manager regarding the participant's disability (if authorized and appropriate), detailing accommodations needed, and addressing components of emergency procedures involving the landlord and/or property manager
- ✓ Coordinating with the tenant to review, update and modify his or her housing support and crisis plan on a regular basis to reflect current needs and address existing or recurring housing retention barriers
- ✓ Connecting the individual to training and resources that will assist the individual in being a good tenant and remaining in lease compliance, including ongoing support with activities related to household management



## 7.4 Appendix D: Performance Requirements

### 7.4.1 Overview

Performance involvement is needed to ensure that the CBRA program is serving its intended audience and reaching its envisioned goals. A primary goal of the program is to divert people exiting institutional settings from homelessness. As with all permanent supportive housing programs, CBRA is also intended to provide permanent housing for residents. Racial equity for those served is another important consideration. Demonstrating that the program meets these goals is important evidence for state legislators that the program is effective and merits further and additional funding.

The Department of Commerce (Commerce) has identified the following as the most critical performance measures for Office of Supportive Housing Permanent Housing Subsidy programs:

- ✓ **Prioritizing those exiting state psychiatric hospitals and community psychiatric inpatient beds.** Measured as “Count of Households from Institutional Situations” compared to the total count of “Households Entered” in HMIS.
- ✓ **The race and ethnicity composition of those served by CBRA program reflects that of the community served.** Measured by comparing the race and ethnicity of people served to the race and ethnicity breakdown of the homeless and unstably housed population by county in the [Homelessness Snapshot Report](#) (Tables 6 and 8).
- ✓ **Increase Percent Exits to or Retention of Permanent Housing.** Measured as “Households Served” minus those exited to non-permanent situations (Households Exited to Temporary Housing Situations; Households Exited to Institutional Situations; Households Exited to Homeless Situations; Households Exited to Other Destinations).
- ✓ **The race and ethnicity composition of those exiting to or retaining permanent housing reflects that of the community served.** Measured by comparing race and ethnicity data of those retaining or exiting to permanent housing to the race and ethnicity breakdown of the homeless and unstably housed population by county in the [Homelessness Snapshot Report](#) (Tables 6 and 8).

### 7.4.2 Instituting Performance Requirements: The Process



Performance targets will be established by Commerce, with input from grantees, in FY2025. Improved data quality will result in a more accurate picture of current performance and will aid in setting realistic and meaningful targets. Preemptive monitoring discussions and technical assistance will be available to grantees in FY2025.

In FY2026, performance targets will be formally applied. Grantees that do not make progress towards performance targets will enter into a performance improvement plan with Commerce which will include investigation into the potential causes and technical assistance to address the identified barriers to progress. Attention will be given to fidelity to the principles outlined in SAMHSA’s Evidence-based Practice toolkit.

## 7.5 Appendix E: Data Quality

Grantees 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.

### 7.5.1 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, and race and ethnicity** from clients that give consent on the [HMIS client informed consent form](#) (or local CoC's equivalent form, modifications must be approved by Commerce). **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 prefers not to answer, 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 prefers not to answer, or Data not collected; or [Date of Birth] is missing.
Race and Ethnicity*	[Race and Ethnicity] field contains Client doesn't know, Client prefers not to answer, Data not collected, or is missing.
Prior Living Situation	[Prior Living Situation] is Client doesn't know, Client prefers not to answer, Data not collected, or is missing.
Destination	[Destination] is Client doesn't know, Client prefers not to answer, No exit interview completed, Data not collected, or is missing.

\*Only measured for consenting clients.

***Expected completeness measures for project types:***

Expected Completeness Measures				
Data Element	Emergency Shelter Entry-Exit	Emergency Shelter Night-by-Night/Drop-in	All other Housing Project Types	Street Outreach
Name*	85%	80%	95%	90%
Date of Birth*	85%	80%	95%	90%
Race and Ethnicity*	85%	80%	95%	90%
Prior Living Situation	85%	80%	100%	85%
Destination	80%	50%	95%	50%

\*Only measured for consenting clients.

### 7.5.2 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.

### 7.5.3 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	
<b>Date of Birth and Project Start Date</b>	Ensure the two are not the same dates.*
<b>Prior Living Situation data elements</b>	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.
<b>Disabling Condition</b>	Ensure the Yes/No answer does not conflict with the specific types of disabling conditions.
<b>Health Insurance</b>	Ensure the Yes/No answer does not conflict with the specific types of health insurance.
<b>Monthly Income</b>	Ensure the Yes/No answer does not conflict with the specific sources of monthly income.
<b>Non-Cash Benefits</b>	Ensure the Yes/No answer does not conflict with the specific sources of non-cash benefits.
<b>Relationship to Head of Household</b>	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.
<b>Veteran Status</b>	Ensure individuals under 18 years of age are not identified as veterans.
<b>Project Population Specifics</b>	Ensure that projects only serving individuals only enroll individuals and not multi-person households. Ensure that projects only serving families with children only enroll families with children. Ensure that projects only serving clients of a specific age range only enroll clients of that age range.

\* **Date of Birth** should only be the same or after **Project Start Date** if a child is born while the household was already participating in the project.

#### 7.5.4 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 HMIS 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's [Consent Refused Client and Domestic Violence Providers Guide](#) (or local CoC's equivalent guidance and form).

- HMIS Data Suppression Policy
- Data Suppression

Data suppression refers to various methods or restrictions that are applied to datasets, reports or visualizations in order to protect the identities, privacy and personal information of individuals.

In Washington State, [RCW 43.185C.180](#) and [RCW 43.185C.030](#) specify that all personal information in the HMIS is confidential and that the identity and right of privacy of these individuals must be protected.

Personal Identifiable Information (PII) is a separate topic and must never be disclosed to any entity that does not have HMIS access or is not part of your data sharing agreement.

- [When Data Suppression Is Required](#)

It is the policy of the HMIS program to suppress data when the data contains demographic detail, the numbers are small enough to potentially identify a person, and:

- Will be in a public space or presentation, or
- Will be shared with an entity that is not covered in the [HMIS client informed consent form \(or local CoC's equivalent form\)](#).

In these cases, any non-zero counts that are under 11 will be suppressed.

Additional suppression will be needed when the suppressed value can be derived from other reported values. For example, when you can calculate the suppressed value by subtracting other values from the grand total.

The exceptions to data suppression are zero values or values that fall under an "unknown" category type. Both of these circumstances do not contribute any valuable information that could identify a person or reveal confidential data and thus, is not subject to suppression.

Learn more about how to apply data suppression and which data sharing entities are required to meet this policy in the [HMIS Data Suppression Policy document](#) (or local CoC's equivalent guidance).

#### 7.6 Appendix F: Lead-Based Paint Visual Assessment Requirements

To prevent lead-poisoning in young children, grantees must comply with the Lead-Based Paint

Poisoning Prevention Act of 1973 and its applicable regulations found at [24 CFR 35](#), Parts A, B, M, and R.

### **Disclosure Requirements**

For ALL properties constructed prior to 1978, landlords must provide tenants with:

- ✓ Disclosure form for rental properties disclosing the presence of known and unknown lead-based paint;
- ✓ A copy of the “Protect Your Family from Lead in the Home” pamphlet.

Both the disclosure form and pamphlet are available at: <https://www.epa.gov/lead/real-estate-disclosure>

It is recommended that rent assistance providers also share this information with their clients.

### **Determining the Age of the Unit**

Grantees should use formal public records, such as tax assessment records, to establish the age of a unit. These records are typically maintained by the state or county and will include the year built or age of the property. To find online, search for your county name with one of the following phrases:

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

### **Conducting a Visual Assessment**

Visual assessments are required when:

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

A visual assessment must be conducted prior to providing CBRA rent assistance to the unit and on an annual basis thereafter (as long as assistance is provided). Grantees may choose to have their program staff complete the visual assessments or they may procure services from a contractor. Visual assessments must be conducted by a HUD-Certified Visual Assessor.

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

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

If a visual assessment reveals problems with paint surfaces, Grantees cannot approve the unit for CBRA assistance until the deteriorating paint has been repaired. Grantees may wait until the repairs are completed or work with the household to locate a different (lead-safe) unit.

### **Locating a Certified Lead Professional and Further Training**

To locate a certified lead professional in your area:

- ✓ Call your state government (health department, lead poison prevention program, or housing authority).
- ✓ Call the National Lead Information Center at 1-800-424-LEAD (5323).
- ✓ Go to the US Environmental Protection Agency website at <https://www.epa.gov/lead> and click on "Find a Lead-Safe Certified Firm."
- ✓ Go to Washington State Department of Commerce Lead-Based Paint Program website at <http://www.commerce.wa.gov/building-infrastructure/housing/lead-based-paint/lead-based-paint-program-lbpabatment/> and click on "Find a Certified LBP Firm" under Other Resources.

Information on lead-based programs in Washington State can be found at

<http://www.commerce.wa.gov/building-infrastructure/housing/lead-based-paint/>.

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

The Lead Safe Housing Rule as well as a HUD training module can be accessed at

[http://portal.hud.gov/hudportal/HUD?src=/program\\_offices/healthy\\_homes/enforcement/lshr](http://portal.hud.gov/hudportal/HUD?src=/program_offices/healthy_homes/enforcement/lshr)

## 8 Appendix G: Acceptable Documentation for Income Certification

Grantees must attempt to document income using the preferred documentation method. However, for some types of income, a written or verbal statement from a third party or self-attestation are allowable as long as all attempts to collect the preferred documentation have been exhausted. Please note the following guidance when using one of these methods.

**Written Statement:** Types of income for which written verification is allowable are indicated in the table below with an ☐ in the box marked “Written Verification.” A written statement must be from a third party responsible for documenting this type of income information (example: wages and salaries could be documented by a written statement from an employer). The statement should also include the following:

- ✓ Date of statement,
- ✓ Name of client,
- ✓ Name of company or organization,
- ✓ Name of individual writing the statement,
- ✓ Wages or income amount,
- ✓ Hour worked per week (if applicable).
- ✓ Signature of individual writing the statement.

**Verbal Statement:** Types of income for which verbal verification is allowable are indicated in the table below with an ☐ in the box marked “Verbal Verification.” A verbal statement must be collected from a third party responsible for documenting this type of income information (example: TANF/Public assistance could be collected via verbal statement from DSHS). A verbal statement must be documented by a written attestation from a case manager or staff person responsible for collecting the statement. The staff person should record the following:

- ✓ Date of statement,
- ✓ Name of client,
- ✓ Name of company or organization,
- ✓ Name of individual writing the statement,
- ✓ Wages or income amount,
- ✓ Hour worked per week (if applicable).
- ✓ Signature of individual writing the statement

**Self-Attestation:** Types of income for which self-attestation is allowable are indicated in the table below with an ☐ in the box named “Self-Attestation.” Self-attestation should be used only when all other attempts at collecting other forms of documentation have been exhausted. Self-attestation is documented as a signed and dated written statement by the client that includes:

- ✓ Sources of income
- ✓ Income amount
- ✓ Frequency of income

A case manager or staff person must also provide a written statement documenting attempts to obtain other forms of verification and justification for using the self-attestation method.

Type of Income	Preferred Documentation	If preferred documentation is not available, the following are acceptable forms of documentation:		
		Written Verification	Verbal Verification	Self-Attestation
No Income		X	X	X
Wages and Salary Income	Copy of most recent pay stub(s).	X	X	X
Self-Employment and Business Income	Copy of most recent federal and state tax return, profit and loss report from applicant's accounting system, or bank statement.	X	X	X
Interest and Dividend Income	Copy of most recent interest or dividend income statement <b>OR</b> most recent federal and state tax return.	X	X	X
Pension/Retirement Income	Copy of most recent payment statement, benefit notice from Social Security, pension provider or other source.	X	X	X
Unemployment and Disability Income	Copy of most recent payment statement or benefit notice	X	X	
TANF/Public Assistance	Copy of most recent payment statement, benefit notice, or Department of Social and Health Services (DSHS) Benefits Verification System (BVS).	X	X	
Alimony, Child Support, Foster Care Payments	Copy of most recent payment statement, notices, or orders.	X	X	X
Armed Forces Income	Copy of pay stubs, payment statement, or other government issued statement indicating income amount.	X	X	X



CBRA Historical Guidelines Changes		
Section	May-23	May-24
4.3.6 Special Circumstances	<p>ⓧ Funds may be used to pay for storage of personal belongings if there are no other suitable storage options available while a permanent housing search is conducted.</p> <p>ⓧ Temporary absence: if a household must be temporarily away from the unit, but is expected to return (such as temporary incarceration, hospitalization, or residential treatment), grantees may pay for the household’s rent for up to 60 days and charge the grant for eligible costs. Any temporary absence must be documented in the client file. Extensions to the 60 day limit must be approved by Commerce.</p>	<p>ⓧ Funds may be used to pay for storage of personal belongings if there are no other suitable storage options available while a permanent housing search is conducted.</p> <p>ⓧ Temporary absence: if a household must be temporarily away from the unit, but is expected to return (such as temporary incarceration, hospitalization, or residential treatment), grantees may pay for the household’s rent for up to 60 days and charge the grant for eligible costs. Any temporary absence must be documented in the client file. Extensions to the 60 day limit must be approved by Commerce.</p> <p>ADDED:</p> <p>ⓧ Internet included as a utility cost: Commerce will consider including internet as a utility cost if all other resources have been exhausted and it is determined that lack of internet coverage will be detrimental to the client securing or maintaining housing. All resources must be documented and presented to Commerce upon the request for an exception.</p> <p>ⓧ Moving costs: Commerce will consider allowing moving costs under special circumstances as long as all other resources have been exhausted and those resources are documented and provided to Commerce upon the request for an exception.</p>
5.3.6 Habitability	<p>Grantees are responsible for documenting habitability for all housing units into which households will be moving, except where a household moves in with friends or family. Housing units must be documented as habitable prior to paying the rent subsidy and following a habitability complaint made by the tenant or a third party.</p>	<p>Grantees are responsible for documenting habitability for all housing units into which households will be moving, except where a household moves in with friends or family. Housing units must be documented as habitable prior to paying the rent subsidy and following a habitability complaint made by the tenant or a third party.</p> <p>ADDED:</p> <p>If a client is moving in with family or friends and a habitability inspection is not completed, the tenant will still need to sign the form after notes have been made stating the reason for not completing the inspection and placed in the client file.</p> <p>If a client is living in a trailer/RV, a Habitability Inspection must be performed and both must pass the Inspection in order for the client to receive CBRA funding.</p>
5.3.6.2. Habitability Recertification	<p>Grantees must document recertification of habitability upon complaint of the habitability condition of the unit by the tenant or a third party. (See 5.3.6.1 Allowable Methods for Unit Habitability Determination). Documentation of habitability recertification must be kept in the client file.</p>	<p>Grantees must document recertification of habitability upon complaint of the habitability condition of the unit by the tenant or a third party. (See 5.3.6.1 Allowable Methods for Unit Habitability Determination). Documentation of habitability recertification must be kept in the client file. ADDED: (See Section 5.3.6 for clients living with family or friends.)</p>

5.3.7 Lead Based Paint Assessment	<p>The grantee must ensure that a lead-based paint visual assessment is completed prior to payment of a permanent housing subsidy if a child under the age of six or pregnant woman resides in a unit constructed prior to 1978.</p> <p>To prevent lead poisoning in young children, grantees must comply with the Lead-Based Paint Poisoning Prevention Act of 1973 and its applicable regulations found at 24 CFR 35, Parts A, B, M, and R.</p> <p>A visual assessment must be conducted upon request from the tenant. Visual assessments must be conducted by a HUD-Certified Visual Assessor and must be documented on the HQS Inspection Form or HHS Form and maintained in the client file.</p> <p>For a guide to compliance see Appendix F: Lead-Based Paint Visual Assessment Requirements.</p>	<p>The grantee must ensure that a lead-based paint visual assessment is completed prior to payment of a permanent housing subsidy if a child under the age of six or pregnant woman resides in a unit constructed prior to 1978. This form must be completed in all living situations, including if living in a trailer or RV.</p> <p>To prevent lead poisoning in young children, grantees must comply with the Lead-Based Paint Poisoning Prevention Act of 1973 and its applicable regulations found at 24 CFR 35, Parts A, B, M, and R.</p> <p>A visual assessment must be conducted upon request from the tenant. Visual assessments must be conducted by a HUD-Certified Visual Assessor and must be documented on the HQS Inspection Form or HHS Form and maintained in the client file.</p> <p>For a guide to compliance see Appendix F: Lead-Based Paint Visual Assessment Requirements.</p>
5.4 HMIS	<p>All eligible clients and their household members served under this program must be entered into HMIS, in accordance with data entry and quality guidelines as issued by the Department of Commerce (See the most recent HUD HMIS Data Standards).</p> <p>All grantees and subgrantees entering data into the HMIS system must sign and comply with the terms of the Agency Partner HMIS Agreement found on the Commerce HMIS webpage.</p>	<p>Lead/subgrantees providing direct service must enter client data into the Homeless Management Information System (HMIS) in accordance with the most current HUD HMIS Data Standards.</p> <p>Balance of State Grantees only: For assistance with a HMIS related question or issue, submit a ticket through Commerce’s HMIS Helpdesk Form. Please visit the Commerce HMIS website for forms, information on training, past newsletters and additional HMIS related resources. Balance of State CoC Grantees must adhere to the Agency Partner Agreement. All grantees and subgrantees entering data into the HMIS system must sign and comply with the terms of the Agency Partnership Agreement</p> <p>Non-Balance of State Grantees only: For assistance, contact your CoC’s HMIS system administrator. Counties not using the State HMIS (data integration counties), must work with the HMIS Manager to provide full CSV exports every three months/quarterly. When Commerce is able to accept monthly imports, counties must upload data to the State’s HMIS using XML or CSV schema compliant with current HUD HMIS Data Standards. Uploads must occur no later than the 30th calendar day following the end of each month. Counties not able to export and upload data to the State HMIS using an approved format must use the State HMIS for direct data entry.</p>
7.4.1 Overview	<p>Performance Measures help evaluate the effectiveness of the Permanent Housing Subsidy program.</p> <p>The current contract period will serve to gather baseline data to inform the development of performance improvement requirements.</p> <p>The Department of Commerce (Commerce) has identified the following as the most critical performance measures for Office of Supportive Housing Permanent Housing Subsidy programs:</p> <ul style="list-style-type: none"><li>☑ Prioritizing those exiting an institution or unsheltered homelessness or households fleeing violence</li><li>☑ Increase Percent Exits to or Retention of Permanent Housing</li></ul>	<p>Performance involvement is needed to ensure that the CBRA program is serving its intended audience and reaching its envisioned goals. A primary goal of the program is to divert people exiting institutional settings from homelessness. As with all permanent supportive housing programs, CBRA is also intended to provide permanent housing for residents. Racial equity for those served is another important consideration. Demonstrating that the program meets these goals is important evidence for state legislators that the program is effective and merits further and additional funding.</p> <p>The Department of Commerce (Commerce) has identified the following as the most critical performance measures for Office of Supportive Housing Permanent Housing Subsidy programs:</p> <ul style="list-style-type: none"><li>☑ <b>Prioritizing those exiting state psychiatric hospitals and community psychiatric inpatient beds.</b> Measured as “Count of Households from Institutional Situations” compared to the total count of “Households Entered” in HMIS.</li><li>☑ <b>The race and ethnicity composition of those served by CBRA program reflects that of the community served.</b> Measured by comparing the race and ethnicity of people served to the race and ethnicity breakdown of the homeless and unstably housed population by county in the Homelessness Snapshot Report (Tables 6 and 8).</li><li>☑ <b>Increase Percent Exits to or Retention of Permanent Housing.</b> Measured as “Households Served” minus those exited to non-permanent situations (Households Exited to Temporary Housing Situations; Households Exited to Institutional Situations; Households Exited to Homeless Situations; Households Exited to Other Destinations).</li><li>☑ <b>The race and ethnicity composition of those exiting to or retaining permanent housing reflects that of the community served.</b> Measured by comparing race and ethnicity data of those retaining or exiting to permanent housing to the race and ethnicity breakdown of the homeless and unstably housed population by county in the Homelessness Snapshot Report (Tables 6 and 8).</li></ul>
7.4.2 Prioritization Requirements	<p>Grantees must prioritize those exiting, needing to exit, or exited from a state psychiatric hospitals and community psychiatric inpatient beds within the past 12 months.</p>	<p>REMOVED Previous Section 7.4.2. Prioritization Requirements</p>

7.4.3 Housing Outcomes	<p><del>7.4.3 Housing Outcomes</del></p> <p>Grantees must improve housing outcomes by increasing exits to or retention of permanent housing.</p> <p>Acceptable housing outcomes are:</p> <p>☑ Remaining in the Permanent Housing Subsidy program</p> <p>OR</p> <p>☑ Exiting from the program to a permanent housing situation</p> <p>7.4.3.1 Measurement</p> <p>The Homeless Management Information System (HMIS) is the data source.</p> <p>Data for the previous state fiscal year will serve as the baseline.</p> <p>Step One: Client Universe</p> <p>Select all people who were served in either the CBRA-PH or CBRA-Other project and all people who exited either the CBRA PH or CBRA Other project during the reporting period.</p> <p>Remove from client universe any person active or exited that did not move into housing, as indicated by a null housing move-in date, or a housing move-in date which occurs after the report end date. Note: Housing move-in date is only collected for the head of household, which effectively makes this a measure of households rather than all people.</p> <p>Of the remaining client universe, remove any person who exited with a destination:</p> <ul style="list-style-type: none"><li>• Foster care home or foster care group home,</li><li>• Hospital or other residential non-psychiatric medical facility,</li><li>• Long-term care facility or nursing home, or</li><li>• Deceased</li></ul> <p>Step Two: Count Exits to or Retention of Permanent Housing</p> <p>Of the client universe, count those who remained in PSH AND count those with destination categorized as permanent.</p> <p>Step Three: Calculation</p> <p><del>Divide the total from step two by the total from step one (client universe) to calculate the percent of people who exited to sustained permanent</del></p>	REMOVED Section 7.4.3 Housing Outcomes
7.4.4 Instituting Performance Requirements: The Process	<p>In July 2020, the CBRA guidelines are released to both CBRA and HARPS LTS grantees.</p> <p>During SFY21 (July 2020-June 2021), Commerce will work with grantees to provide HMIS set-up, technical assistance and training. Commerce will also work with grantees to identify any data quality issues and to gather baseline data for setting future performance targets. Grantees should focus on data quality and aligning the project with performance requirements.</p> <p>In SFY22 (July 2021-June 2022), Performance targets will be set and the performance requirements set in Appendix D: Performance Requirements will go into effect. Grantees should be comfortable reviewing performance data on a regular basis and identifying barriers to successfully reaching performance targets.</p>	<p>Performance targets will be established by Commerce, with input from grantees, in FY2025. Improved data quality will result in a more accurate picture of current performance and will aid in setting realistic and meaningful targets. Preemptive monitoring discussions and technical assistance will be available to grantees in FY2025.</p> <p>In FY2026, performance targets will be formally applied. Grantees that do not make progress towards performance targets will enter into a performance improvement plan with Commerce which will include investigation into the potential causes and technical assistance to address the identified barriers to progress. Attention will be given to fidelity to the principles outlined in SAMHSA’s Evidence-based Practice toolkit.</p>
7.5 Appendix E 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.	Grantees 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.

7.5.1 Completeness	<p>Completeness of data is measured by the percentage of incomplete fields in required data elements.</p> <p>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.</p> <p>All clients, consenting and non-consenting, must have complete prior living situation and exit destination data.</p> <p><i>Examples of Incomplete Entries and Expected completeness measures for SFY24 and prior found in table "Incomplete Entries" in SFY24 and prior guidelines.</i></p>	<p>Completeness of data is measured by the percentage of incomplete fields in required data elements.</p> <p>Agencies are expected to collect first name, last name, date of birth, and race and ethnicity from clients that give consent on the HMIS client informed consent form (or local CoC's equivalent form, modifications must be approved by Commerce). 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.</p> <p>All clients, consenting and non-consenting, must have complete prior living situation and exit destination data.</p> <p><i>Changes to Table:</i> <i>"Incomplete Entries": Race and Ethnicity combined into one measure.</i> <i>"Expected Completeness Measures for Project Types": Race and Ethnicity combined into one measure, Domestic Violence and Fleeing DV removed, All project types included in the table.</i></p>
7.5.3. Accuracy	<p>Data entered into HMIS must reflect the real situation of the client/household as closely as possible.</p> <p>Accurate data is necessary to ensure any project reporting fairly represents the work of the project and each client's story.</p> <p><i>Examples of Elements of Data Accuracy for SFY24 and prior found in SFY24 and prior guidelines.</i></p>	<p>Data entered into HMIS must reflect the real situation of the client/household as closely as possible.</p> <p>Accurate data is necessary to ensure any project reporting fairly represents the work of the project and each client's story.</p> <p><i>Changes to Table:</i> <i>Domestic Violence Victim/Survivor added as an accuracy element. No other changes.</i></p>
7.5.4 Consistency	<p>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.</p> <p>All data will be collected, entered, and stored in accordance with the Agency Partner Agreement.</p> <p>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.</p> <p>Clients who refuse consent must be made anonymous per Department of Commerce Guidance and the consent refused client entry guide.</p>	<p>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.</p> <p>All data will be collected, entered, and stored in accordance with the Agency Partner Agreement.</p> <p>All data elements and responses will be entered per the HUD HMIS Data Standards Manual. To avoid inconsistency, agencies should use language on intake forms that closely matches the elements and responses in HMIS.</p> <p>Clients who refuse consent must be made anonymous per Department of Commerce's Consent Refused Client and Domestic Violence Providers Guide (or local CoC's equivalent guidance and form).</p> <ul style="list-style-type: none"><li>• HMIS Data Suppression Policy</li><li>• Data Suppression</li></ul> <p>Data suppression refers to various methods or restrictions that are applied to datasets, reports or visualizations in order to protect the identities, privacy and personal information of individuals.</p> <p>In Washington State, RCW 43.185C.180 and RCW 43.185C.030 specify that all personal information in the HMIS is confidential and that the identity and right of privacy of these individuals must be protected.</p> <p>Personal Identifiable Information (PII) is a separate topic and must never be disclosed to any entity that does not have HMIS access or is not part of your data sharing agreement.</p> <ul style="list-style-type: none"><li>• When Data Suppression Is Required</li></ul> <p>It is the policy of the HMIS program to suppress data when the data contains demographic detail, the numbers are small enough to potentially identify a person, and:</p> <ul style="list-style-type: none"><li>• Will be in a public space or presentation, or</li><li>• Will be shared with an entity that is not covered in the HMIS client informed consent form (or local CoC's equivalent form).</li></ul> <p>In these cases, any non-zero counts that are under 11 will be suppressed.</p> <p>Additional suppression will be needed when the suppressed value can be derived from other reported values. For example, when you can calculate the suppressed value by subtracting other values from the grand total.</p> <p>The exceptions to data suppression are zero values or values that fall under an "unknown" category type. Both of these circumstances do not contribute any valuable information that could identify a person or reveal confidential data and thus, is not subject to suppression.</p> <p>Learn more about how to apply data suppression and which data sharing entities are required to meet this policy in the HMIS Data Suppression Policy document (or local CoC's equivalent guidance).</p>



## EXHIBIT E(b): PROVIDER DELIVERABLES

PROVIDER: COMPASS HEALTH

CONTRACT: NORTH SOUND BH-ASO-COMPASS-CBRA-23

CONTRACT PERIOD: 07/01/2023 – 06/30/2025

### Identification of Deliverables

Provider shall provide all deliverables as identified in the Required Deliverables Grid below. Templates for all reports that the provider is required to submit to North Sound BH-ASO may be found on the North Sound BH-ASO website under *Forms & Reports* (click [here](#)). North Sound BH-ASO may update the templates from time to time and will notify providers of any changes. Deliverables are to be submitted to [deliverables@nsbhaso.org](mailto:deliverables@nsbhaso.org) on or before the indicated due date unless otherwise noted. For more information regarding a specific deliverable, please refer to the indicated Supplemental Provider Service Guide reference (as applicable) or by emailing [deliverables@nsbhaso.org](mailto:deliverables@nsbhaso.org).

DELIVERABLE	FREQUENCY	DUE DATE	SUPPLEMENTAL PROVIDER SERVICE GUIDE REFERENCE
Exclusion Attestation Monthly Report	Monthly	Last Business Day of each month following the month being reported	Chapter 11
Proviso 86 (BH Housing) Report	Quarterly	15 <sup>th</sup> of the month following quarter being reported (1/15, 4/15, 7/15, 10/15)	Chapter 19; Section 19.12
Certification of Liability Insurance	Annual	Annually prior to expiration	Not Applicable
Compliance Training Attestation Statement	Annual	Annual notification will be sent by North Sound BH-ASO Compliance Officer with further information	Chapter 11
Ownership and Control Disclosure Form	Annual	Annually on January 31 <sup>st</sup> , or more frequently when changes occur	Not applicable