Greater Columbia Behavioral Health, LLC
ASO -Administrative Service Organization

CONTRACT AGREEMENT
Behavioral Health Services Community Behavioral Health Rental Assistance (CBRA): 26CBRA-PRC-01

This Agreement is made and entered into by, and between **GREATER COLUMBIA BEHAVIORAL HEALTH, LLC BH-ASO,** hereinafter referred to as "GCBH", and the Network Provider identified below, hereinafter referred to as the "Contractor". Governed by Chapter 41.05 RCW and Title 182 WAC.

CONTRACTOR INFORMATION:

Contractor Name: Palouse River Counseling

Contractor Address: 340 Maple St. Pullman, WA 99163

CEO or Director Contact: Kathleen Stewardson, Director
Alternate Contact: Shannon Dooley, COO

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FY26 GRANT AMOUNT	FUNDING SOURCE	CFDA Number
$111,159.00	Federal: State: X Other: N/A	
FY27 GRANT AMOUNT	**FUNDING SOURCE**	**CFDA Number**
$109,409.00	Federal: **State: X** Other: N/A	
TAX ID #	**UBI #**	**DUNS**
74-3061832	602 236 800	833258572

ASO (Administrative Service Organization):

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AGREEMENT START DATE: 07/01/2025 AGREEMENT END DATE: 6/30/2026

AGREEMENT START DATE: 07/01/2026 AGREEMENT END DATE: 6/30/2027

EXHIBITS	**CONTRACTED**	
When the box(s) are marked with an X, the following exhibits are attached to and incorporated into this Agreement by reference:		
Attachment A – Scope of Work	X	
Attachment B – Budget	X	REVISED 07/01/2026
Attachment C – Complaint Procedure	X	
Attachment D – CBRA Guidelines	X	REVISED 07/01/2026
Exhibit H - Data Use, Security, and Confidentiality	X	
Exhibit R - Qualified Service Organization Business Associate Agreement	X	
Exhibit S - Service Area Matrix	X	
Exhibit U1 - Statement of Work (HOUSING)	X	

The terms and conditions of this Agreement are an integration and representation of the final, entire, and exclusive understanding between the parties superseding and merging all previous agreements, writings, and communications, oral or otherwise regarding the subject matter for this Agreement between the Parties. The Parties signing below represent they have read and understand this Agreement and have the authority to execute this Agreement. This Agreement shall be binding on GCBH only upon signature by GCBH.

IN WITNESS WHEREOF, the parties have signed this executed Agreement:

GREATER COLUMBIA BEHAVIORAL HEALTH, LLC

____

GCBH Chairman, Executive Board **Date**

Approved as to Content:

____

GCBH Co-Director/QM/CCO **Date**

Approved as to Form:

____

GCBH Legal Counsel **Date**

Content/Form Prepared by:

____

GCBH Accounting/Auditor/Contracts **Date**

Content/Form and Fiscal Review:

____

GCBH Co-Director/ Finance Director **Date**

FOR CONTRACTOR:

____

Signature Date

____

Printed Name

____

Title

Palouse River Counseling

CBRA Network Provider Name

Guidelines

FOR THE

Community Behavioral Health Rental Assistance Program (CBRA)

July 1, 2026– June 30, 2027

Version 1.0

July 2026

Released June 3, 2026

Table of Contents

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 (ALTSA) 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

The CBRA program is funded through State General Fund appropriations authorized by the Washington State Legislature. Initial funding for CBRA was established through ESSB 5092 (2021-2023 Operating Budget), Section 129(85), which allocated funding for long-term rental subsidies for individuals with mental health or substance use disorders.

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 within ten (10)?? business days of receipt.

2.1.2 Commerce Risk Assessment

Prior to contracting CBRA funds, Commerce will conduct a risk assessment in accordance with Housing Division policies and procedures using approved tools and data maintained in the division wide risk assessment system.

In cases where contracts are extended or continue within an existing biennium, Commerce may rely on a previously completed risk assessment and is not required to conduct a new assessment unless otherwise determined necessary.

Approved risk assessment tools will include:

- ✓ A base risk assessment based on standard elements utilized across the Housing Division. This risk assessment informs the monthly invoice submission documentation requirements for each contract.
- ✓ A program-specific risk assessment based on program and funder specific risk factors. This risk assessment combines with the base risk assessment to determine the type, depth and frequency of contract monitoring.

2.1.3 Commerce Monitoring

Commerce will monitor lead grantees' CBRA grant activities. Lead grantees will receive at least 30 days' notice unless there are special circumstances that require more immediate action. Monitoring notices will specify the scope and components of the review.

2.1.4 Discharge Planning Facilitation

Grantees are responsible for establishing and maintaining active coordination with discharge planners at state psychiatric hospitals, community-based psychiatric inpatient institutions, and subgrantees to ensure priority populations are identified and served. Coordination must include maintaining current points of contact, engaging in ongoing communication to support referral pathways, and facilitating timely referrals for eligible individuals.

Grantees are expected to document outreach and coordination efforts and to demonstrate how referrals are being facilitated and tracked. Commerce may request documentation of these activities to ensure compliance with program requirements.

Lead grantees should also support the development of referral pathways with other behavioral health institutions for individuals who are not part of the priority population but meet eligibility criteria.

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2.1.5 Subgrantee Management Requirements

Upon Commerce approval, lead grantees may enter into an agreement with any other nonprofit or governmental housing assistance organizations operating homelessness programs within a defined service area. Subgrantee requirements are outlined in CBRA Grant General Terms and Conditions, Section 33. All subgrantee agreements must be time-limited and have defined roles and responsibilities, detailed budgets and performance terms. Commerce reserves the right to contact subgrantees directly at any time regarding data quality, monitoring, fiscal and other issues.

Commerce contracts only allow self-insurance for government entities that contract directly with Commerce. Lead grantees who enter subcontracts are responsible for defining subcontracting terms, including the types of allowable insurance.

Lead Grantee Responsibilities are as follows:

- ✓ Lead grantees must maintain written procedures related to subcontracting and retain copies of all subcontracts and associated records.
- ✓ Lead grantees must ensure that subcontracts require subcontractors to comply with applicable terms of the Commerce grant and include language stating that Commerce and the State of Washington are not liable for claims or damages arising from subcontractor performance.
- ✓ Lead grantees must provide Commerce with copies of subgrant agreements (upon request) and notify Commerce of any subgrant terminations during the grant period.
- ✓ Lead grantees must notify Commerce of any changes to subgrantee selection or to the interventions provided by subgrantees funded through CBRA.

2.1.5.1 Subgrantee Risk Assessment and Monitoring

Lead grantees are responsible for ensuring subgrantee compliance with all requirements of the CBRA program. Lead grantees must maintain written policies and procedures governing the risk assessment, monitoring activities, and monitoring frequency.

For each subgrantee, the lead grantee must conduct a Commerce-approved risk assessment and develop a corresponding monitoring plan within six (6) months of executing a CBRA-funded subcontract. 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 conduct additional or targeted reviews when audit findings or other emerging issues require prompt intervention or investigation.

2.2 Performance Measurement

Performance Measures help evaluate the effectiveness of the Permanent Housing Subsidy programs. For more details, see Appendix E: Performance Requirements.

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

- ✓ Increasing retention in the PHS program or exits to permanent housing
- ✓ Ensuring equitable outcomes for vulnerable populations

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 must also provide information to Commerce to support legislative reporting and strategic distribution of funding.

2.4 Fiscal Administration

2.4.1 Budget Caps

Indirect Costs may not exceed fifteen (15%) of total contracted budget. See Section 4 for allowable expenses for Indirect and Direct administrative costs and approved billing methods.

2.4.2 Reimbursements

Lead grantees must submit invoices to Commerce on a monthly basis for reimbursement of allowable costs or payment of deliverables. Invoices are due no later than the twentieth (20th) calendar day of the month following the billing period unless otherwise approved by Commerce.

Failure to submit an invoice for three (3) consecutive months without prior approval or a documented explanation may result in corrective action, including withholding of payment or reduction of the contracted amount.

Final invoices for a biennium may be due earlier than the standard deadline, as specified by Commerce.

Exceptions to standard billing requirements must be in writing by Commerce and documented in the contract or through formal contract amendment.

Any approved exception must specify the alternative billing schedule and requirements. Requests for exceptions must be submitted in advance to Commerce.

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 include the following:

- ✓ The Commerce-provided CBRA Monthly Voucher Detail Report, completed in full and unaltered in format. Lead grantees must use the current version provided by Commerce and may not modify structure or fields of the report.
- ✓ A general ledger or equivalent financial report that clearly identifies all costs charged to the CBRA grant for the billing period. The report must be organized in a manner that allows Commerce to easily identify CBRA-related expenses. Reports generated from accounting systems or maintained in spreadsheets are acceptable, provided they are complete, accurate, and clearly labeled.
    - The general ledger must include an attestation from the lead grantee that all costs presented are true, correct, and complete, and that all expenditures were incurred in accordance with CBRA program requirements and the terms and conditions of the contract. The lead grantee affirms that supporting source documentation is maintained and available for review upon request.
- ✓ Any required back-up documentation identified in the Risk Assessment Monitoring Plan for this contract, if applicable based on risk level. (See Section 2.1.2 Commerce Risk Assessment for how back-up documentation requirements are determined. See Housing Division

Documentation Matrix for more information on specific documentation).

Requests for payment of deliverables must include all documentation specified in the contract deliverables schedule. All deliverables must be reviewed and approved by the contract manager prior to payment.

All required supporting documentation must be submitted with the invoice in the Contract Management System (CMS).

Commerce may require additional documentation as needed to approve reimbursement. Lead grantees must retain receipt level source documentation for all eligible expenses and original invoices submitted by 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 immediately notify Commerce of any use of CBRA funds for ineligible households or expenses. Grantees are responsible for implementing controls to prevent ineligible use of funds and must take prompt corrective action, including repayment of ineligible costs, as directed by Commerce.

3 Program Eligibility and Priority Populations

3.1 Priority Population

Grantees must prioritize households meeting eligibility criteria who are discharging, needing to discharge, or who have discharged within the past twelve (12) months from state psychiatric hospitals or community psychiatric inpatient facilities.

Grantees may only serve households outside of the priority population after demonstrating that reasonable and documented efforts have been made to identify and serve eligible individuals within the priority population. Documentation must include outreach, referral activity, or coordination efforts with relevant institutions.

Grantees must maintain records demonstrating how priority populations are identified, referred, and offered access to available resource.

Upon approval from Commerce, grantees may establish additional local prioritization criteria when the priority population has been exhausted or when there are no eligible priority population referrals available.

Lead Grantees using regional 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.

Subgrantees using local prioritization criteria must produce and maintain a prioritization policy that is approved by the Lead Grantee and 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). Loss of eligibility for a long-term supportive services program due to stabilization does not, by itself, result in loss of CBRA eligibility, provided the household continues to meet income requirements and demonstrates ongoing need for housing stability

Criteria One
Household Income is at or below 50% of area median income as defined by HUD. (See Section 3.2.2.4 Documentation of Household Income Eligibility)

AND

Criteria Two		**Criteria Three**		**Criteria Four**
Have a documented Behavioral Health Condition[1]	AND	Has a history of eligibility for or prior engagement with long term supportive services (see Appendix C)*	AND	Have a documented need for long-term housing subsidy with no other suitable[2] 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.

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

[1] 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.

[2] 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.

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, history of, or prior engagement 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, history of, or prior engagementfor 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.

    - ✓ *Acceptable documentation for supportive services may also include written statements documenting a participant's choice not to engage in services. This may be documented through a case note, service plan entry, or written statement from program staff or the participant indicating that services were offered, discussed, and declined. The documentation must include the date of the discussion and be maintained in the client file. A participant signature is encouraged but not required.

    - ✓ *Other documentation as approved by Commerce" may include alternative forms of written verification that demonstrate eligibility, prior eligibility, or ongoing need for long-term supportive services. This may include documentation from referral partners, discharge planners, prior program enrollment records, or other third-party verification. Documentation must be sufficient to support the eligibility determination and must be made available to Commerce upon request.

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 (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, Title 24 – Housing and Urban Development: Subtitle A 0-99: Part 5: Subpart F: Section 5.609 Annual Income. Exceptions to the Federal inclusions and exclusions align with WAC 388-450-0015 and include:

- ✓ TANF or other forms of public cash assistance (ABD, HEN, etc.)
- ✓ Basic food benefits
- ✓ Payments made to someone outside of the household for the benefit of the participant's household using funds that are not owed to the household
- ✓ Third party payments as income when a payment is specifically directed to be paid to a third party, doesn't pass through the participant household's control at any point and isn't otherwise

payable to them.

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

CBRA supports housing stabilization in real-world conditions where participant engagement and housing placement may not follow a linear path.

Grantees are expected to apply program requirements in a manner that supports housing stability while maintaining compliance with eligibility, documentation, and funding requirements.

Participant engagement and progress toward housing may vary over time. Temporary setbacks, disengagement, or delays in housing placement do not, on their own, require termination from the program. Grantees must document efforts, barriers, and reassessment of strategies to support continued progress toward housing stabilization.

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.

  - ✓ *Acceptable documentation for supportive services may also include written statements documenting a participant's choice not to engage in services. This may be documented through a case note, service plan entry, or written statement from program staff or the participant indicating that services were offered, discussed, and declined. The documentation must include the date of the discussion and be maintained in the client file. A participant signature is encouraged but not required.

  - ✓ "Other documentation as approved by Commerce" may include alternative forms of written verification that demonstrate eligibility, prior eligibility, or ongoing need for long-term supportive services. This may include documentation from referral partners, discharge planners, prior program enrollment records, or other third-party verification. Documentation must be sufficient to support the eligibility determination and must be made available to Commerce upon request.
- ✓

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.

3.3.3 Ongoing Participation and Housing Progress

Participants enrolled in CBRA must be supported in securing and maintaining housing in accordance with Housing First principles, which prioritize immediate access to housing without preconditions and provide voluntary, participant-centered services.

Grantees must document ongoing efforts to assist participants in accessing housing, including identifying and addressing barriers that may impact housing placement. Engagement in housing-related activities is voluntary and may vary based on individual needs, readiness, and choice.

When a participant is not housed, grantees must document continued efforts to support housing placement, barriers encountered, and strategies implemented to address those barriers.

If housing placement is not achieved over time, grantees must reassess the effectiveness of current approaches and identify adjustments to better support the participant. This may include changes in housing strategy, level of support, or coordination with other services.

Grantees are responsible for using CBRA resources effectively to support housing outcomes. When barriers to housing persist, reassessment should include consideration of alternative strategies or resource adjustments that align with both participant needs and program goals.

Housing assistance must not be conditioned on participation in services, treatment compliance, or demonstration of progress. Decisions regarding continuation, modification, or transition of assistance must align with Housing First principles and the CBRA Termination and Denial of Service Policy.

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 allowable and eligible activities and costs to support the primary activity is found in this section.

4.1 Deliverables

Contract deliverables support the primary activity of the program and include adherence to all applicable activities and requirements of the program guidelines. All deliverables and their required back-up documentation must be submitted to Commerce for approval. Payment as listed in the deliverables table of the contract will be provided upon approval of the deliverable.

4.2 Allowable Costs for Cost Reimbursement

<u>A cost may be charged to a grant only if it is allowable.</u>

To be allowable, a cost must be:

- ✓ Necessary and *reasonable for the performance of the award
- ✓ **Allocable to the grant as either a direct or indirect cost
- ✓ Consistently treated in like circumstances
- ✓ Adequately documented
- ✓ Determined in accordance with Generally Accepted Accounting Principles (GAAP)
- ✓ Otherwise consistent with program policies and procedures
- ✓ Not an expressly unallowable cost

[2 CFR 200.403](#) – Factors affecting allowability of costs

*To be *reasonable* a cost must be:

- ✓ Generally recognized as ordinary and necessary
- ✓ Match market prices for comparable goods/services
- ✓ In accordance with sound business practices

[2 CFR 200.404](#) – Reasonable costs

**To be *allocable* for reimbursement a cost must be:

- ✓ Incurred specifically for the award, or
- ✓ Benefits both the award and other work and can be distributed in proportions that may be approximated using reasonable methods
- ✓ Chargeable or assignable to the award in accordance with relative benefits received
- ✓ Not generating profits for grantees or subgrantees

[2 CFR 200.405](#) – Allocable costs

Allowable costs fall into two categories Direct costs and Indirect costs. Where housing costs are considered direct costs in the CBRA program, administrative costs will be considered either indirect or direct costs depending on the cost's association with the award. Please note,

- ✓ Costs incurred for the same purpose in like circumstances must be treated consistently as either direct or indirect costs.
- ✓ Indirect cost categories will vary by organization. The designation of costs as direct or indirect must be identified prior to the execution of a contract and cannot change during the contract period.

4.3 Administrative Costs

The term "administrative costs" may include both indirect and direct costs, depending on whether the cost can be identified directly or indirectly to the award.

4.3.1 Indirect Administrative Costs (Formerly Administration)

Indirect administrative costs are costs that cannot be identified for a specific award, or activity but are incurred as the result of multiple awards, services and activities. These are the costs incurred for common or joint purpose and benefit more than one cost objective. They are not readily assignable to an award without effort which would be disproportionate to the result achieve. Because these costs often benefit more than just the award in question, they cannot be listed as direct costs without unreasonable effort to determine exactly what proportion of these costs should be allocated to a particular cost objective.

Examples of common indirect administrative costs:

- ✓ Accounting staff, HR or payroll staff
- ✓ Executive level staff time if not billed directly to a program
- ✓ General organization insurance.
- ✓ Organization wide audits.
- ✓ Board expenses.
- ✓ Marketing and advertising when not specific to a program.
- ✓ Organization-wide membership fees and dues when not specific to a program

- ✓ General agency facilities costs such as rent when not considered a program specific site or used by a specific program
- ✓ Supplies or services used by multiple teams (i.e. utilities, general office supplies)

Examples of costs serving joint purposes (may be applied as indirect or direct, depending on the circumstances):

- ✓ Rent/lease of office space
- ✓ Administrative and/or executive staff salaries
- ✓ Supplies or services used by multiple teams (utilities, general office supplies)

(See Appendix D for a framework to help identify indirect versus direct cost categories)

All amounts billed as indirect administrative costs 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 methods which is approved by Commerce prior to contracting:

4.3.1.1 **Cost Allocation**

When using cost allocation as a method to bill indirect administrative costs to the CBRA program, shared costs (as described in Section 4.2.1) are allocated to the grant by means of a reasonable cost allocation formula as approved by Commerce prior to contracting.

4.3.1.2 **De Minimis Rate**

When using a De Minimis rate as a method to bill indirect administrative costs to the CBRA program, indirect costs are charged to the grant using up to a specified rate applied to an identified cost pool known as Modified Total Direct Cost (MTDC). The amount charged to the grant may not exceed 15 percent of the MTDC, but all indirect administrative charges must be supported by actual costs.

4.3.1.2.1 Modified Total Direct Cost (MTDC)

The Modified Total Direct Cost (MTDC) is a defined term under 2 CFR 200. It is the sum of all direct costs less certain excluded costs.

Included	Excluded
Direct Salaries and Wages	Equipment *(tangible personal property including it systems having a useful life of more than one year and a per-unit acquisition cost that equals or exceeds the lesser of the capitalization level established by the lead or subgrantee for financial statement purposes or $10,000)*
Applicable fringe benefits (*in proportion to the salary charged to the award, to the extent that such payments are made under formally established and consistently applied organizational policies)*	Capital Expenditures *(expenditures to acquire capital assets or expenditures to make additions, improvements, modifications, replacements, rearrangements, reinstallations, renovations, or alterations to capital assets that materially increase their value or useful life)*
Materials and Supplies	Rental Costs *(rent/lease/mortgage of office space or any other facilities)*
Services Contract/Consultant Fees *(Allowable when reasonable in relation to the*	Charges for patient care, scholarships and fellowships

objectives of the services rendered and applicable to program objectives)	
Travel *(Allowable when reasonable in relation to the objectives of the travel and applicable to the program)*	Participant support costs and payments to or on behalf of beneficiaries *(ex. Rent assistance, utility payments, relocation costs, flex funds, etc.)*
Subawards up to the first $50,000 *regardless of the period of performance of the subawards under the award.*	The portion of each Subaward in excess of $50,000.

Please note, other items may only be excluded when necessary to avoid a serious inequity in the distribution of indirect costs.

4.3.2 Direct Administrative Costs (Formerly Operations)

Direct costs are specific, identifiable and incurred to provide services or products for a specific award, services or activity that are directly assigned relatively easily with a high degree of accuracy. Association with the award is the determining factor in distinguishing direct from indirect costs. Only direct costs can be traced to a specific program or project. When specifically identifiable to an award this may include:

- ✓ Salaries and benefits for administering the CBRA program or providing eligible services (data collection and entry, housing search and placement, and/or eligibility determination and recertification activities)
- ✓ Training
- ✓ Travel and Per Diem (if allowable in the scope of work for this contract)
- ✓ Materials and Supplies
- ✓ Equipment (up to $1,500 per grant period unless approved in advance by Commerce)
- ✓ Office space and/or utilities (Only for a program specific site or specific square footage). (See Appendix D for a framework to help identify indirect versus direct cost categories)

4.4 Housing Costs (Cost Reimbursement)

All housing costs must comply with lease and tenancy requirements outlined in Section 5.3.2.

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.

4.4.1 Emergency Housing Costs

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.

4.4.2 **Securing Housing**

- ✓ Costs for securing permanent housing including application fees, background check fees, credit check fees, and other related costs for securing permanent housing.
- ✓ Costs to cover documents needed to move a client into housing such as identification and birth certificates etc.
- ✓ 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.
- ✓ Utility deposits and arrears may be paid when necessary to support housing stability. Payment of utility arrears is generally limited to no more than three months; however, exceptions may be made when required to secure or maintain housing, particularly in areas with limited housing options.
- ✓ All exceptions must be documented, including justification for the amount paid and how the expense supports housing placement or stability.

4.4.3 **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

4.4.4 **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.

4.4.5 **Other Housing Costs**

- ✓ **Utility payments** may be provided for households receiving CBRA rental assistance when utilities are not included in rent and are necessary to maintain housing stability. Eligible costs include essential utilities such as electricity, water, sewer, garbage, and natural gas. Assistance must be reasonable, and documented in the client file, including confirmation that no other resources are available. Utility arrears may be considered when necessary to prevent loss of housing.

- ✓ **Storage costs** may be covered when no other suitable options are available and storage is necessary to support an active housing search or transition. Costs must be reasonable, time-limited, and limited to essential personal belongings. Grantees must document the need and may not use funds for long-term or indefinite storage.

- ✓ **Standalone internet** services not included in rent may be considered only when all other resources have been exhausted and with prior Commerce approval. Costs must be documented in the client file and are limited to basic internet service necessary to support housing stability. Bundled services and optional add-ons, such as cable television or streaming services, are not eligible.

- ✓ **Moving costs** may be approved by Commerce under special circumstances when necessary to secure or maintain housing and when all other resources have been exhausted. Requests must include documentation of need and verification that alternative resources were explored.

- ✓ **Other housing-related costs** may be approved by Commerce on a case-by-case basis when necessary to support housing stability.
- ✓
- ✓
- ✓

4.4.6 Temporary Absence and Subsidy Continuation

This section outlines requirements and limitations related to temporary absences from a unit and the continuation of CBRA-funded rental assistance.

- ✓ 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 when necessary to support housing stability and when there is a reasonable expectation of the participant’s return to the unit.

  When an absence extends beyond 60 days, or when there is no clear plan for the participant to return to the unit within a reasonable period of time, grantees should contact the Commerce Program Manager to discuss next steps and options.

4.5 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.

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. Lead grantees may create and maintain regional policies and procedures governing regional practices on referrals and prioritization.

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, which prioritize immediate access to safe, stable housing without preconditions, while offering voluntary, supportive services to promote long-term stability.

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.

5.2.4 Coordination with Other Programs

Grantees may coordinate with other housing and service programs to support timely housing placement when program requirements and real-time housing availability do not fully align.

Coordination across programs must ensure that CBRA funds are not duplicative of other funding sources and that roles and responsibilities are clearly defined. Grantees must document how multiple funding sources or programs are being used to support housing placement and stability.

5.3 Ongoing Program and Staff Development

Commerce highly encourages grantees and subgrantees to participate in ongoing learning and staff development opportunities to strengthen person-centered, culturally responsive practices and improve outcomes for individuals experiencing housing instability and homelessness.

These opportunities may include formal trainings, workshops, technical assistance, peer learning, and independent learning on key topic areas. Grantees are encouraged to engage in learning in ways that best fit their organizational capacity and community needs.

The following trainings and topic areas are recommended:

- ✓ Crisis intervention
- ✓ Landlord Tenant Law
- ✓ 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 (Program Requirements)

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.

Housing supported with CBRA funds must be governed by a lease or rental agreement that establishes a landlord-tenant relationship consistent with applicable landlord-tenant law.

Residency in program-based, transitional, or recovery housing settings is allowable only when the participant has tenant protections consistent with a lease or rental agreement, and occupancy is not contingent on program participation requirements beyond standard tenancy obligations.

Participant preference for a specific housing type does not waive the requirement for tenancy protections under this program.

In limited circumstances, CBRA assistance may be used on a short-term basis, not to exceed 90 days, to support participants residing in transitional, recovery, or other program-based housing settings that do not meet the tenancy requirements outlined above, for the purpose of facilitating transition to compliant housing.

Grantees should document a plan to transition the participant to housing that meets program requirements within this timeframe. Continued assistance in housing that does not meet tenancy requirements beyond 90 days is not considered long-term eligible housing under this program.

If compliant housing has not been secured within 90 days due to barriers beyond the participant's control, assistance may continue on a temporary, case-by-case basis with documented justification to prevent a return to homelessness.

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: CoC Leasing and Rental Assistance Requirements - Rent Reasonableness - HUD Exchange

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[3]. 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 Quarterly Check-In with Landlords

CBRA providers must check in with each landlord receiving CBRA subsidy payments at least quarterly to verify that the CBRA participant is still housed in the unit. All check-ins with landlords must be documented in the client file and include:

- ✓ Landlord's Name
- ✓ Tenant's Name
- ✓ Date of each contact attempt
- ✓ Date contact was made
- ✓ Signature/date of program staff verifying housing.

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[3]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.

5.3.7 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 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.

5.3.7.1 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.

5.3.7.2 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 5.3.7.1 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.)

5.3.7.3 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.

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).

Lead grantees are not required to have written habitability complaint procedures. However, Lead grantees must respond to complaints about habitability that are unresolved by subgrantees according to their written complaint procedures (see Section 5.5.1 Responding to Complaints)

5.3.8 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**.**

5.3.8.1 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.

5.3.9 Washington Residential Landlord-Tenant Act

Grantees must provide participants with information about their rights and responsibilities under the

Washington Residential Landlord-Tenant Act (RCW 59.18).

Grantees are expected to support participants in understanding and navigating landlord-tenant issues that may impact housing stability, including lease compliance, notices, habitability concerns, and dispute resolution.

Grantees are not expected to provide legal advice but should support participants in accessing appropriate legal or advocacy resources when needed.

For additional guidance, grantees and participants may refer to Washington Law Help (https://www.washingtonlawhelp.org/issues/housing/tenants-rights) and other local legal aid or tenant advocacy resources.

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

5.4 Homeless Management Information System (HMIS)

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 Continuum of Care (BoS CoC) agencies using the State HMIS: All data must be collected, entered, and stored in accordance with the Agency Partner Agreement. 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.

Counties not using the State HMIS (data integration counties), must work with Commerce 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.

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.

5.4.1 HMIS Data Quality

HMIS participating agencies are required to provide quality data to the best of their ability. Balance of State Continuum of Care (BoS CoC) agencies must enter HMIS data in accordance with requirements outlined in the HMIS Data Quality Plan.

Maintaining a high level of data quality is important for effective program evaluation. Data quality has four elements. Data quality requirements and targets for the elements listed below are identified in the HMIS Data Quality Plan.

- Timeliness,
- Completeness,
- Accuracy, and

- Consistency.

5.4.2 Consent for Entry of Personally Identifying Information

5.4.2.1 Identified Records

- ✓ Personally identifying information (PII)[4] 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* (or local CoC's equivalent 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 HMIS Agency Partner Agreement.

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.
- ✓ Minors under the age of 13 with no parent or guardian available to consent to the minor's information in HMIS
- ✓ Households in programs which are required by funders to report HIV/AIDS status.

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.

5.4.3 HMIS Data Suppression Policy

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.

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

[4] PII includes name, social security number, birthdate, address, phone number, email, and photo.

- ✓ Will be shared with an entity that is not covered in the [HMIS 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).

5.4.4 HMIS Data Quality

HMIS participating agencies are required to provide quality data to the best of their ability. Balance of State Continuum of Care (Bos CoC) agencies must enter HMIS data in accordance with the requirements outlined in the HMIS Data Quality Plan.

Maintaining a high level of data quality is important for effective program evaluation. Data quality has four elements. Data quality requirements and targets for the elements listed below are identified in the HMIS Data Quality Plan.

- ✓ Timeliness
- ✓ Completeness
- ✓ Accuracy
- ✓ Consistency

For additional information on HMIS Data Standards and data quality expectations, refer to the HMIS resources listed in this section.

5.4.5 HMIS Monitoring and Oversight

Lead grantees do not have direct access to HMIS and must monitor subgrantee compliance through review of standardized reports submitted by subgrantees.

Subgrantees providing direct services must submit HMIS-generated reports to the lead grantee on a quarterly basis and work with their local Continuum of Care HMIS team to correct any data quality issues identified by their agency, the Lead Grantee, the HMIS administrator, or Commerce.

HMIS Reports for BoS, King County, and Pierce County

- ✓ [HUDX-225] HMIS Data Quality Report
- ✓ Data Quality Reports Info Sheet: https://deptofcommerce.app.box.com/s/3trq1aqiwzi429ij017871maecoxmw9m

HMIS Reports for Other Independent Continuums of Care (CoCs)

- ✓ Clark County – Run an APR/CAPR report and include tables 5a and 6A-F. Please reach out to your agency's HMIS Administrator with any questions.
- ✓ Snohomish and Spokane – In ClienTrack run the HUD Data Quality Report also referred to

as MDQR.

At a minimum, lead grantees must:

- ✓ Review required data elements in the reports for completeness, timeliness, accuracy, and consistency (see HMIS Data Quality Plan for specific data quality requirements)
- ✓ Document their review of submitted reports and obtain confirmation from the subgrantees CoC HMIS team that the subgrantee has resolved all data quality issues satisfactorily.
- ✓ If there are concerns that can't be resolved, the Lead must work with their Commerce program manager to address any outstanding data concerns.

5.5 Additional Requirements

5.5.1 Responding to Grievances/Complaints

Lead grantees and subgrantees must provide a timely, transparent and fair grievance process for participants. Complaints and grievances must first be addressed through the Lead or Subgrantee's internal grievance/ complaint procedure, beginning at the lowest appropriate level and following an established escalation and appeals process. Complaints that are lodged with Lead and Subgrantees must be responded to in a timely and respectful manner, as outlined in their complaint procedure. Unresolved complaints may be escalated to the CBRA program manager at Commerce.

Grievance:

Grievance is a concern, dissatisfaction, dispute, or request for review related to services, staff interactions, program decisions, or service delivery that is submitted through a Lead Grantee or Subgrantee's internal grievance procedure.

Complaint:

A complaint is an unresolved grievance or alleged violation of program requirements, contractual obligations, participant rights, non-discrimination requirements, health and safety standards, fraud, waste, abuse, or other compliance-related concerns that have been escalated to Commerce for formal review.

5.5.1.1 Grievance Procedure

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

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

5.5.1.2 Complaint Process

All Lead and Subgrantees are responsible for addressing complaints about their services and/or any unresolved complaints about services provided by their subgrantees or subcontractors. All complaints not resolved to the satisfaction of the complainant are considered unresolved.

- ✓ Service Recipients are individuals or families receiving services from lead or subgrantees. Service recipients submit complaints directly to the service provider (usually the subgrantee) following their established complaint procedure. If the complaint is not resolved to their satisfaction through the subgrantee/Lead grantee's complaint process, the service recipient escalates the complaint to Commerce in one of the following ways:

  - Emails the CBRA Program Manager at CBRAADMIN@commerce.wa.gov
  - Emails the HD Quality Assurance Manager at HDComplaints@commerce.wa.gov.
- ✓ Sub Grantees receive complaints from service recipients are responsible for addressing all complaints about their services and/or unresolved complaints about services provided by any subcontractors. If complaints are not resolved to the satisfaction of the complainant, subgrantees must escalate the complaints to the Lead Grantee following the Lead Grantee's complaint process.
- ✓ Lead Grantees are responsible for addressing all complaints about their services or supports and/ or unresolved complaints about services or supports provided by subgrantees. If a complaint involves but has not been addressed by a subgrantee, the Lead Grantee forwards the complaint to the subgrantee via their complaint process to first be addressed at the lowest level. If a complaint involving a subgrantee is not resolved at the subgrantee level, it is addressed at the Lead Grantee level. If a complaint is not resolved at the Lead Grantee level, the Lead Grantee will assist, where appropriate and necessary, in escalating the complaint to Commerce.
- ✓ Commerce is responsible for addressing all complaints about their services or supports, unresolved complaints about the services or supports of lead grantees, and escalated complaints about the services or supports of subgrantees. If Commerce receives a complaint involving a Lead grantee or subgrantee, the complaint will be forwarded to the appropriate party to address at the lowest possible level. Otherwise, Commerce will evaluate and respond to complaints in alignment with the Housing Division Complaint Procedure.

5.5.1.3 **Documenting Complaints**

Lead Grantees and subgrantees must maintain complaint logs which may be reviewed during monitoring or upon request by Commerce.

5.5.1.4 **Complaint Procedures**

Both Lead Grantees and subgrantees must maintain written complaint procedures establishing a process to receive complaints related to the CBRA program and/or any service or deliverable funded under this program. This procedure must be written in plain language and include:

- ✓ Clear instructions on how anyone can lodge a complaint about the services delivered.
- ✓ Contact information for a responsible person(s) in the organization that complaints can be forwarded to and who Commerce can follow-up with regarding complaints.
- ✓ Clear instructions on how to access translation and accessibility accommodation when lodging a complaint.
- ✓ Clear instructions on how to lodge an anonymous complaint about a Lead Grantee/subgrantee staff member, including how to escalate a complaint anonymously to Commerce.
- ✓ Clear response steps including how and when the agency will notify appropriate parties when

complaints have been filed, who will be notified, timelines for responding to complaints, the process of how the complaint will first be addressed at the lowest level, the progression/appeals process that may lead up to involvement with Commerce and steps to escalate the complaint to Commerce, if needed.

- ✓ Clearly prohibit any form of retaliation via fines, fees, or other strictly enforced terms and clear language encouraging individuals afraid of repercussions for filing a complaint due to retaliation to submit complaints directly to Commerce.
- ✓ Clearly list the Commerce Housing Division as an entity that can receive complaints if all other avenues have been exhausted and/or service recipients are afraid of repercussions due to lead and/or subgrantee retaliation.
- ✓ Note that the Lead Grantee complaint process is not meant to replace landlord-tenant law or other applicable laws, provisions or established processes such as Medicaid fair hearing processes.

The complaint procedure and contact information for the responsible person at the agency to receive complaints must prioritize transparency and be accessible to employees, subgrantees and the public.

For Lead Grantees this includes being provided directly to all subgrantees, accessible to all employees working with CBRA funds, posted at the facility and on the agency or program's website, included in regional guidelines or CBRA program handbooks and available to the public upon request.

For Subgrantees this includes being provided to all CBRA participants at the beginning of receiving CBRA services, accessible to all employees working with CBRA fund, posted at the facility and on the agency or program's website, included in or referenced in recipient materials including client handbooks and/or signatory paperwork, verbalized to awardees during intake and available to the public upon request.

5.5.2 Termination and Denial of Service Policy/Procedure

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 complaint 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

Lead Grantees must have a Termination of Service Procedure for the CBRA program that details any steps Subgrantees must take prior to terminating a CBRA participant from program.

Lead Grantees may have a Denial-of-Service Procedure detailing any steps Subgrantees must take prior to denying services for a potential or current CBRA participant.

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	Leads	Subs
Subcontracting policies and procedures (section 2.1.5)	X	--
Referral policies and procedures (section 5.1)	O	X
Habitability Complaint Procedure (section 5.3.6.3)	--	X
Complaint Procedure (section 5.5.1.3)	X	X
Termination or Denial of Service Policy (section 5.5.2)	--	X
Termination of Service Procedure (section 5.5.2)	X	O
Denial of Service Procedure (section 5.5.2)	O	O
Prioritization Policy, if applicable (section 3.1)	O	O

Table Key:

X= Required

O= Optional

-- = Not Needed

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 CBRA webpage.

	Required Documentation
✓	***CBRA Client File Checklist**
✓	***HMIS Client Release of Information and Informed Consent Form signed by all adult household members (unless DV OR client refuses consent) (section 5.4.2)**
✓	***CBRA Verification of Eligibility Checklist Form with applicable documentation attached (section 3.2.2)**
✓	***CBRA Verification of Recertification with applicable documentation attached, *as needed (section 3.3.1)***
✓	**CBRA Income Eligibility Worksheet, *as needed for recertification* (section 3.3.1)**
✓	***Landlord Habitability Certification or *HHS or *HQS (section 5.3.7)**
✓	**Lead-based Paint Assessment, if applicable (section 8, Appendix F)**
✓	**Executed Lease or Rental Agreement (section 5.3.2)**
✓	**Household Rent subsidy amount / Rent determination process (section 5.3.5)**
✓	**Quarterly Check-In with Landlord Verification (section 5.3.6)**
	Required Information
✓	**Dates and Circumstances of temporary absence to an institution (section 4.3.6)**
	Other Recommended Forms
✓	**CBRA Certification of Long-Term Housing Support Need (section 3.2.2.3)**
✓	**Rent Calculation Worksheet (Section 5.3.5)**
✓	**Rent Reasonableness Worksheet (Section 5.3.4.2)**
✓	**Move in/Move out condition report (section 6)**

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: Framework of Potential Identification of Indirect Cost Categories

Potential INDIRECT Cost Categories	How these cost may also be considered DIRECT costs
Audit Costs	
Board Expenses	
General Office Supplies	Program Specific Supplies
Executive Level Staff	If executive staff work and track time directly on a program. **
Insurance	Program specific insurance
Marketing/advertising	Specific to a program
Organization membership fees/dues	Specific to a program
Rent/lease for office space	For a program specific site, specific square footage used by a specific program
STAFF	
HR Staff	If HR staff work and track time directly on a program. **
IT Staff	Proportion based on # of computers, etc.
Accounting Staff	If accounting staff work and track time directly on a program. **
Payroll staff	If payroll staff work and track time directly on a program. **
Utilities	For a program specific site, proportion specific to the program.

** Generally, one person's salary can either be directly charged or indirectly charged in one program, NOT both. If direct billed, timekeeping must be performed.

7.5 Appendix E: Performance Requirements

Performance monitoring is needed to ensure that the CBRA program is serving its intended audience and reaching its envisioned goals. Grantees must adopt the required housing outcome performance measure outlined in Table A below.

Grantees must improve housing outcomes by making progress towards the statewide performance targets. The performance target is the level of desirable performance and is an indicator of a high performing system.

Grantees that do not make progress towards the performance requirements will enter into a corrective action plan developed by the AHAH and DPU departments at Commerce. The Program Manager and the Data and Performance team will provide technical assistance as appropriate. If the grantee fails to meet the performance requirements after entering into a corrective action plan, they may be subject to a reduction in funding.

Table A: Required CBRA Performance Measures

Performance Measure	Calculation	Performance Target
Exits to or Retention of Permanent Housing	Of people in PSH, those who remained in PSH or exited to permanent housing destinations	Target: 95%

Equitable Outcomes	Exits to or Retention of Permanent Housing, disaggregated by race and ethnicity	Outcomes across racial and ethnic demographics should not be significantly less than the overall rate

7.5.1 Compliance Methodology

The Homeless Management Information System (HMIS) and RDA's database are the data sources for calculating the baseline performance and progress towards performance targets.

Exits to or Retention of Permanent Housing Calculation

Step One: Client Universe

Select all people who were served by CBRA during the reporting period.

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. If a head of household has multiple exits, all exits are included.

Of the remaining client universe, remove any person who exited to one of the following destinations:

- Foster care home or foster care group home
- Hospital or other residential non-psychiatric medical facility
- Long-term care facility or nursing home
- Deceased

Step Two: Count Exits to or Retention of Permanent Housing

Of the client universe, count those who remained in the CBRA program AND those with destination categorized as permanent.

Other permanent housing destinations are:

- Owned by client, no ongoing housing subsidy
- Owned by client, with ongoing housing subsidy
- Rental by client, no ongoing housing subsidy
- Rental by client, with ongoing housing subsidy
- Staying or living with family, permanent tenure
- Staying or living with friends, permanent tenure
- Permanent Supportive Housing
- Other permanent housing dedicated for formerly homeless persons

Step Three: Calculate Percentage

Divide the total from Step Two by the total from Step One (client universe) to calculate the percent of people who exited to or retained permanent housing.

Step Four: Compare percentage against target or baseline
If percentage obtained from Step 3 is 95% or higher, the grantee is in compliance on this performance measure.
If the percentage is under 95%, it will be compared against baseline data (the performance on the same measure for the prior fiscal year). If the current percentage is *higher than the baseline*, the grantee is in compliance with the performance measure. Otherwise, the grantee will be required to enter into a corrective action plan.

Equitable Outcomes Calculation

Commerce will evaluate the CBRA program's outcomes by assessing exits to or retention of permanent housing across racial and ethnic demographics for any potential disparities[1].

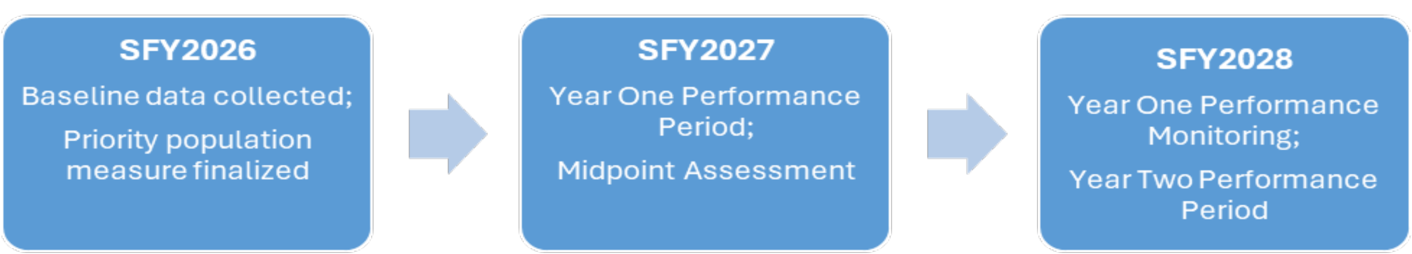
To be considered in compliance with the equitable outcomes performance measure, the housing outcomes of the households across racial and ethnic demographics should not be significantly less than the overall rate[2]. If racial or ethnic disparities in housing outcomes are identified in the data, Commerce will determine if the requirement has been met on a case-by-case basis.

Example:

	Overall rate (All households)	Rate for Black/African American households	Rate Differences	Disparity Identified
Example Community A	80%	60%	-20 %	Yes, disparities identified
Example Community B	75%	75%	0%	No disparities identified

[1] For the equitable outcomes measure, disparities are defined as instances in which the outcome rate of a particular racial or ethnic category is significantly less than the overall rate.
[2] The "overall rate" refers to the rate of a particular intervention type's total exits to positive outcomes. This is inclusive of all ethnic or racial categories.

7.5.2 **7.5.2 Performance Timeline**



SFY26

In early SFY26, the Priority Population Measure will be finalized. The remainder of the year will then serve as a baseline data collection period.

SFY27

SFY27 will serve as the first year for which performance is monitored. TA will be available during this year, with an informational Midpoint Assessment conducted to advise grantees of their progress.

SFY28

The first Monitoring will occur in early SFY28 on the full year of SFY27 data. Grantees that do not make progress towards the performance requirements will enter into a corrective action plan.

This year will also serve as the second year for which performance is monitored (monitoring occurring early SFY29).

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/leadand 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-lbpabatement/ 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 https://www.hudexchange.info/programs/lead-based-paint/lshr-toolkit/introduction/

7.7 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
Interest and Dividend Income	Copy of most recent interest or dividend income statement **OR** 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	
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