



Emergency Shelter and Homeless Prevention Program Guidelines

All of the requirements in these program guidelines apply to both the Lead Agency/Grantee and Subgrantees. These guidelines will be updated as necessary throughout the grant period. Check out www.commerce.wa.gov/ESHP frequently to ensure you are referencing the latest version and information.

1. Program Overview

The Emergency Shelter and Homeless Prevention program is supported by state and federal funds which are passed through to eligible Grantees who provide emergency shelter, homeless prevention, and case management to individuals and families who are homeless or at risk of becoming homeless.

2. Performance Measures

A. Emergency Shelter

Reduce shelter length of stay and transition individuals and families to permanent housing.

B. Homeless Prevention

Keep individuals and families most at risk of becoming homeless in current housing through emergency rental assistance.

3. Program Restrictions

A. Grantee shall not:

- Require participation in a religious service as a condition of receiving assistance;
- Require payment from clients for services rendered;
- Supplant funding;
- Use funds to rehabilitate **or repair** emergency shelters or purchase equipment with a value over \$1,000 without prior COMMERCE approval;
- **No mortgage payments on a shelter facility or costs associated with a mortgage payment such as taxes and insurance.**

4. Eligible Shelter and Prevention Expenses

Grant funds can be used for up to 180 days of combined shelter and prevention services for an individual or family.

- No more than 90 of those days can be used for Emergency Shelter.
- 180 days may be used for Prevention only.

Example 1: An individual stays in shelter for 90 days. They can then be served for an additional 90 days of Prevention. Prevention could be any combination of initial rent costs, such as first and last months rent, security and utility deposits, etc., as long as the total amount does not equal more than 90 days of rent.

Example 2: An individual stays in shelter for 60 days. They can then be served for an additional 90 days of rent assistance and 30 days of utility assistance, which equals a total of 120 days of prevention.

The days need not be consecutive. The total 180 days is for a calendar year.

A. Shelter Operations

- Utilities (heat, electric, water and sewer, garbage removal)
- **Lease/rent payment**
- Maintenance (janitorial supplies, pest control, fire safety, contract or staff maintenance and repairs, materials)
- Security
- Expendable supplies (food, office supplies)
- Expendable transportation costs directly related to the transportation of clients (bus tokens and fuel for a shelter van)
- Hotel/Motel Vouchers – short-term hotel or motel vouchers
- Other costs as approved by COMMERCE.

B. Shelter Case Management

- Staff salary and benefits for case managers and support staff for assisting individuals and families in the shelter or working with clients who have been provided a motel/hotel voucher
- Other costs as approved by COMMERCE

C. Homeless Prevention

- Rent or mortgage subsidies to prevent eviction. Use of funds for eviction prevention is restricted to individuals or families who have received eviction or foreclosure notices or other COMMERCE approved documentation from a landlord or financial

- institution. Assistance must be necessary to avoid eviction or foreclosure. There must be a reasonable prospect that the individual or family receiving homelessness prevention assistance will be able to resume payments within a reasonable period of time. Rental assistance is to be paid directly to the landlord on the client's behalf. Mortgage subsidies are to be paid directly to the lender on the client's behalf.
- First and/or last month's rent, rent, security deposits, and screening fees.
- Mediation program for landlord tenant disputes and legal services.
- Utility payments for individuals or families who have received a termination of service notice, to avoid shutoff of utilities. Other utility assistance programs should be accessed first, such as Washington State's Low-Income Home Energy Assistance Program www.liheapwa.org. Utility payments must be made directly to utility companies on the client's behalf.
- Other costs as approved by COMMERCE.

D. Prevention Case Management

- Staff salary and benefits for case managers and support staff directly assisting individuals and families.
- Other costs as approved by COMMERCE.

E. Administration

Administrative expenses are also sometimes called indirect or overhead. Such expenses can include, but are not limited to the following: executive director/accounting/human resource salaries, benefits, supplies, space, equipment; general agency insurance; audits; board expenses; membership or association fees and dues.

In cost reimbursement contracts, grants or interagency agreements, administration/indirect/overhead expenses can be charged to the funding sources using either a cost allocation plan or a federally approved indirect cost rate. Regardless of the method used, the rate of reimbursement shall not exceed that specified in the grant. All reimbursements shall be based on actual expenses. Estimates such as 1/12th do not qualify for reimbursement.

5. Eligibility for Assistance

Individuals or families eligible for assistance must either be homeless or highly at risk of becoming homeless.

A homeless person is someone who is living on the street or in an emergency shelter, or who would be living on the street or in an emergency shelter without homelessness assistance. A person is considered homeless only when he/she resides in one of the places described below:

- In places not meant for human habitation, such as cars, parks, sidewalks, abandoned buildings, on the street;
- In an emergency shelter;
- In transitional or supportive housing for homeless persons who originally came from the streets or emergency shelters;
- In any of the above places but is spending a short time (up to 30 consecutive days) in a hospital or other institution;
- Is being evicted within a week from a private dwelling unit **and** no subsequent residence has been identified **and** the person lacks the resources and support networks needed to obtain housing **or** their housing has been condemned by housing officials and is no longer considered meant for human habitation;
- Is being discharged within a week from an institution in which the person has been a resident for more than 30 consecutive days and no subsequent residence has been identified **and** the person lacks the resources and support networks needed to obtain housing; or
- Is fleeing a domestic violence housing situation and no subsequent residence has been identified **and** the person lacks the resources and support networks needed to obtain housing.

6. Documentation needed for Emergency Shelter and Prevention activities

Grantees are required to maintain adequate documentation of homelessness or at risk of homelessness (in the client file) to determine the eligibility of persons served in the client file.

Documentation should include the following:

Situation	Documentation
Persons living on the street or in short-term emergency shelter	Information should be obtained to indicate that the participant is living on the street or in short-term emergency shelter. This may include names of organizations or outreach workers who have assisted them in the past, whether the client receives any general assistance checks and where the checks are delivered, or any other information regarding the participant's activities in the recent past that might provide documentation. If unable to verify that the person is living on the street or in short-term emergency shelter, the participant or a staff person may prepare a short written statement about the participant's previous living place. The participant should sign the statement and date it.
Persons coming from transitional housing for homeless persons	Obtain written verification from the transitional housing staff that the participant has been residing at the transitional housing facility. The verification should be signed and dated by the referring agency personnel.

Persons being eviCOMMERCE from a private dwelling or house being foreclosed	Obtain evidence of formal eviction notice indicating that the participant was being eviCOMMERCE within a week before receiving homeless assistance. If the participant's friends or family is evicting, a statement describing the reason for eviction must be signed by the friend or family member and dated. In other cases where there is no formal eviction process, persons are considered eviCOMMERCE when they are forced out of the dwelling unit by circumstances beyond their control. In those instances, obtain a signed and dated statement from the participant describing the situation. The grantee must make efforts to confirm that these circumstances are true and have written verification describing the efforts and attesting to their validity. The verification should be signed and dated.
Persons house being foreclosed	Obtain evidence that the participant requesting assistance has a mortgage foreclosure notice.
Persons being released from jail or prison, or leaving an inpatient mental health facility or chemical-dependency treatment facility	Obtain evidence from the referring facility's case manager or other authorized staff that the participant is being or was released/exited and has no identified housing option.
Persons fleeing domestic violence	Obtain written verification from the participant that he/she is fleeing a domestic violence situation. If a participant is unable to prepare verification, the case manager may prepare a written statement about the participant's previous living situation for the participant to sign and date.
Utility shut off	Obtain evidence from the utility company of notice of termination.

Prevention payments made on behalf of clients do not need to be in the client file, but need to be made available when requested by COMMERCE.

***Self-Declaration:** Written statements by clients are acceptable ONLY when other verifications are not available. Since this method is self-serving, it should be viewed with caution and accepted as a last resort. Case manager may write the narrative if the client is unable. Client signature is required.

COMMERCE does not require that copies of an individual's driver's license, birth certificate or other identifying information be required or maintained in a client file to be eligible for Shelter or Prevention services. If the Grantee chooses to request this type of documentation, it should be for a specific, appropriate and time limited purpose and maintained in a confidential manner.

7. Termination of Participation, Denial and Grievance Procedures

Grantees may terminate assistance to clients who violate program requirements and may deny service if the participant is ineligible. Grantees must have in place a procedure that governs the termination, denial and grievance process. These procedures should describe the program requirements and the termination, denial process and a grievance procedure that

might, for example, allow participants to request a hearing regarding the termination of their assistance. The procedures should be readily available to participants either in written information or by posting them in a public place. **These documents will be carefully reviewed during program monitoring.**

8. Nondiscrimination Policy

Grantees shall neither deny services to, nor otherwise discriminate in the delivery of services, against any person who otherwise meets the eligibility criteria for the program on the basis of race, color, religion, gender, sexual orientation, age, national origin, **immigration status**, ancestry, marital status, physical or mental handicap or because such person is the recipient of federal, state or local public assistance.

9. Confidentiality of Client Records

Grantees must develop and implement policies and procedures ensuring client records are maintained in a confidential manner. To comply with this requirement, Grantees should, for example, keep written records or files pertaining to clients under lock and key with designated personnel granted access to those files.

10. Food Banks

Grantees must make information about local food banks available to clients. This can be accomplished through a flier or brochure posted on a bulletin board. A list of Washington State food banks can be found at www.COMMERCE.wa.gov/site/279/default.aspx.

11. Criminal Background Checks

Grantees must initiate criminal history background checks pursuant to WA State RCW 43.43.832 and 43.43.834 for all prospective employees and volunteers who may have unsupervised access to children.

12. Participation of Homeless Persons

Grantees must involve at least one homeless or formerly homeless person(s) in a policy-making function within their organization. This might include, for example, involvement of a homeless or formerly homeless person on the Board of Directors or other entity that provides feedback or advice and may help evaluate or make decisions for the Grantee agency.

13. Lead Based Paint

The Lead-Based Paint Regulations may or may not apply to your shelter; more information is available at www.hud.gov/lea.

14. Program Administration

A. Grantee Eligibility

An eligible grantee must:

- Be a unit of local government, non-profit organization, housing authority, or federally recognized Indian tribe in the state of Washington.
- Have been a provider of emergency shelter or homeless prevention for one year prior to the beginning date of the grant year or serve an area or population of demonstrated unmet need determined by a consortium of service providers in the county.
- Ensure to the best of their ability that the individuals and families that are receiving emergency shelter or homeless prevention are not receiving duplicated assistance from the Department of Social and Health Services and/or assistance from the Washington State Low-Income Home Energy Assistance Program (LIHEAP).

B. Ineligible Programs

Group care facilities, congregate care facilities, transitional housing programs, detoxification centers, and crisis residential centers are not eligible to receive funding.

C. Subgrantees

Lead Agencies shall not subgrant work or services contemplated under this program without prior authorization from COMMERCE. It is the responsibility of the Lead Agency to ensure that subgrantees meet eligibility requirements. The intent to subgrant shall be included in the grant application to COMMERCE. Approval of the grant application, including the intent to subgrant, shall constitute authorization.

Lead Agencies with subgrantees shall enter into a written agreement ensuring that all COMMERCE grant terms and conditions are passed on to subgrantees. This must include a signed contract that details the budget to be reimbursed and all of the COMMERCE grant terms and conditions.

D. Monitoring and Compliance of Subgrantees

- It is the responsibility of the Lead Agency to monitor subgrantees at a minimum of once every two years. The monitoring may consist of either a desk monitor or site visit. Terms and conditions of the grant and program guidelines need to be reviewed for compliance. At least one month of back up documentation needs to be reviewed to substantiate charges made to the program.
- Review the accounting practices of subgrantees that do not have an independent audit.

- Ensure all funds are expended in a timely manner, and according to the terms and conditions of the ESHP grant.
- COMMERCE will review Lead Agencies monitoring reports of their subgrantees.

E. Reports

The Lead Agency is responsible for submitting required reports by the dates due using required forms. The reports include, but are not limited to, the following:

Report	Due Date
Invoice Voucher	No more than monthly, due on the 15 th of month following the provision of services, except in July, when it is due on a date to be specified by COMMERCE.
Client Data Report	The 15th of the month following provision of services.

F. Budget Amendments

The approved budget is identified in the grant documents. Budget revisions are subject to the following parameters:

- Grantees may make budget revisions of up to ten percent (10%) of the total budget without an amendment provided any caps on budget categories are not exceeded.
- Budget revisions exceeding ten percent (10%) of the total grant amount require a grant amendment. Requests must be submitted to, and approved by, COMMERCE before the Grantee submits expenditure reports reflecting the revisions.

G. Lead Agency Monitoring

COMMERCE will monitor Lead Agencies at a minimum once every two years. Monitoring may consist of either a desk monitor or an on-site visit. Terms and conditions of the grant and program guidelines will be reviewed for compliance.

H. Changes to Guidelines

COMMERCE may issue revised or new guidelines at any time. All Grantees will be sent revised copies as they are published. It is the Grantees responsibility to pass on the revisions to subgrantees.