AMERICAN RESCUE PLAN ACT
POLICY AND OPERATIONS MANUAL

CHAPTER 2: OUTREACH

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CHAPTER 2: OUTREACH

2.1   OVERVIEW OF OUTREACH

2.1.1   DEFINITION

Outreach services are designed to meet the immediate needs of people experiencing unsheltered homelessness by connecting them with Emergency Shelter, housing, and/or critical health services. Some Outreach programs also address the immediate needs of individuals who are unsheltered through the provision of items such as food, clean clothing, hygiene kits, and resource lists. Though Outreach efforts may vary in intensity and resources, they should incorporate the United States Interagency Council on Homelessness Core Elements of Effective Street Outreach[1]. In Pierce County, Outreach services have a specific focus on providing Coordinated Entry (CE) services to unsheltered individuals.

2.1.2   GOALS AND OBJECTIVES

The goal of Outreach is to ensure that CE is available to those unsheltered households who do not actively seek Shelter or services yet have a high need for assistance from the Homeless Crisis Response System (HCRS). Outreach teams will seek out homeless households wherever they are staying (e.g., encampments), or accessing services. While Outreach services can also include efforts to understand service needs (e.g., behavioral health issues), the focus of the engagement should be problem solving to meet the household's most basic needs, including their housing needs, using a Housing First approach. Please see Section 4.6.3 for other examples of Outreach Best Practices and Policies.

For some households experiencing chronic homelessness[2], multiple contacts over an extended period may be needed for engagement to be successful. Outreach teams are expected to continue to engage with these households with the goal of helping them to transition to permanent housing. Specialized Outreach teams may be deployed for chronically homeless single adults, Veterans, or youth and/or young adults.

2.1.1.1   EXPECTATIONS FOR STREET OUTREACH

- While Street Outreach can include efforts to understand service needs (e.g., behavioral health issues), the focus of the engagement should be problem-solving to meet the household's housing needs, using a housing first approach. For some chronically homeless households, multiple contacts over an extended period of time will likely be needed for engagement to be successful.

- Since many unsheltered and chronically homeless households will initially decline an offer of shelter or housing assistance, Street Outreach teams are expected to continue to engage with these households over an extended period, with the goal of eventually assisting the household to make the transition to permanent housing.

- When an unsheltered household is matched to an available program vacancy, the outreach team will be responsible for attempting to locate the household and assisting them to complete

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[1] https://www.usich.gov/resources/uploads/asset_library/Core-Components-of-Outreach-2019.pdf
[2] See Section 6.2.1.1 for a full definition of chronic homelessness

the steps needed to enroll in the housing project, such as collection of eligibility documentation, if the household chooses to do so.

- Coordinate with and support the Pierce County Dept of Emergency Management to deliver necessary outreach services during emergencies, including seasonal weather response, as appropriate.

2.1.3 PARTICIPATION IN COORDINATED ENTRY

Outreach programs either provide or connect participants to CE services.

2.2   ELIGIBILITY AND TYPICAL SERVICE FLOW

2.2.1   ELIGIBILITY REQUIREMENTS: FOR PROGRAM ENTRY

2.2.1.1   STANDARD ELIGIBILITY

Outreach services are targeted to assist people experiencing unsheltered homelessness who are otherwise not connected to Shelter, housing, or other critical services. Households must meet the following conditions:

- Households must be experiencing homelessness, in accordance with Category 1 or Category 4 of the U.S. Department of Housing and Urban Development (HUD)'s Homelessness Definition as defined by HUD under 24 CFR Part 578[3].

2.2.1.2   ADDITIONAL ELIGIBILITY: REQUIREMENTS SPECIFIC TO ARPA

Funding Source	Eligibility Guidelines
ARPA	In addition to the Standard Eligibility Requirements above, the following requirements apply for ARPA-funded Outreach programs: • Households eligible for ARPA resources must have income at or below 50% Area Median Income.

2.2.2   ELIGIBILITY RE-CERTIFICATION: REQUIREMENTS FOR ENROLLED HOUSEHOLDS

There are no eligibility re-certification requirements for Outreach programs.

2.2.3   TYPICAL SERVICE FLOW

Process Step	Process Detail
Outreach and Engagement	1. Outreach teams engage households who are unsheltered and staying outdoors, in cars, vehicles, RVs, abandoned buildings, or other places not intended for human habitation. Participants are engaged for the purpose of providing immediate support, intervention, and connections with homelessness assistance programs and/or mainstream services. These engagements are initiated by Outreach teams directly and/or via referrals from CE. a. Referrals from CE: When a household who is unsheltered is matched to an available vacancy, the Outreach team is responsible for attempting to locate the household.
Data Collection / Program Enrollment	1. Outreach teams collect HMIS data and complete program enrollments for individuals or households to whom they are providing services. This information may be collected in one

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[3] See Appendix A-2 for details.

	encounter or over multiple engagements. Every engagement contact throughout the program enrollment should be entered in HMIS. 2. As one of the sources of homelessness status verification is documentation of unsheltered homelessness by an Outreach provider, Outreach staff members are also responsible for confirming the sleeping location of households experiencing unsheltered homelessness. Additional information may be found in **Section 2.3.2: Service Standards**.

CE Connections	1. For households not already connected to CE, Outreach teams will provide CE services including:
	
	    a. Diversion (See **Homeless Housing Program Policy and Operations Manual Chapter 3: Coordinated Entry, Section 3.3.5 Diversion Conversation**.)
	
	    b. Assessment (See **Homeless Housing Program Policy and Operations Manual Chapter 3: Coordinated Entry, Section 3.3.6 Prioritization and Eligibility**.)
	
	2. For households connected to CE who are matched to an available resource, Outreach teams will assist households in completing the steps needed to enroll in the housing program, such as collection of eligibility documentation.

Case Management and Resource Connections	1. Program staff will assess household housing and service needs and assist households in connecting with resources to address their immediate or crisis needs, including but not limited to:
	
	    a. Food pantries, Basic Food (Supplemental Nutrition Assistance Program) enrollment
	
	    b. General Assistance, Temporary Assistance for Needy Families (TANF), Apple Health
	
	    c. Connections to community-based services such as childcare, employment, health, mental health, etc.
	
	    d. Transportation assistance
	
	2. Program staff will monitor and evaluate participant progress and provide information, referrals, and service coordination.

Program Exit	1. Upon exit from the Outreach program, staff will close out all agency paperwork according to agency procedures and exit the household from the Outreach program in HMIS.

2.3   POLICIES AND STANDARDS

2.3.1   LOCAL, STATE, AND FEDERAL REGULATIONS

Outreach programs are governed by an array of state, local, and federal regulations. Service providers should reference applicable regulations included in **Chapter 1.3: Universal Policies and Standards**. This is not an exhaustive list; it is the responsibility of each individual grantee to ensure they are in compliance with all applicable local, state, and federal regulations. In instances where regulations overlap, service providers must comply with the more stringent of the applicable regulations.

2.3.2   SERVICE STANDARDS

2.3.2.1   HOMELESSNESS VERIFICATION

Outreach teams support the HCRS in meeting documentation requirements of homelessness status eligibility by [confirming and documenting the housing status of households experiencing Category 1 or Literal Homelessness](#)[4]. As persons who are experiencing homelessness may move frequently, Outreach providers may be requested to confirm housing status for anyone for whom sleeping in an unsheltered location or other location included within HUD's Category 1 homelessness definition is a frequent or sustained activity, even if this is interrupted by periods of sleeping in non-street homeless locations (such as a family or friend's apartment or a hotel).

To the extent feasible, Outreach providers are expected to confirm street homelessness by witnessing the household actually sleeping outdoors. If this is not possible, Outreach providers are expected to meet households at the location where they are reporting sleeping overnight.

2.3.2.2   COORDINATED ENTRY ACTIVITIES

Outreach teams should be trained to perform the following Coordinated Entry (CE) activities:

- Screening
- Diversion Conversation (if household identifies a solution through Diversion, the Outreach team may implement the solution or may provide a warm handoff to a CE provider to implement the solution)
- Prioritization Interview
- Collect initial documents needed to enter household in CE
- Work with households who are high on the priority list to complete documentation needed for admission to a housing program
- Document chronic homelessness, as needed

Outreach programs that perform these activities are expected to follow the services standards for Diversion and Assessment (See **Homeless Housing Program Policy and Operations Manual Chapter 3: Coordinated Entry**).

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[4] https://www.hudexchange.info/faqs/2758/how-can-encounters-with-the-individual-or-head-of-household-by-the-outreach/

2.3.3   PROGRAM EXIT

Households should be exited from the program when: 1) they are no longer eligible for or in need of services, or 2) violation of a Program Agreement is discovered. In all cases of exiting the program (voluntarily or involuntarily), staff must provide written communication to the both the household (and if applicable) the landlord, as well as inform any other partner staff with whom the household is currently working. Providers must have a Termination of Assistance procedure that adheres to the policy below.

2.3.3.1   TERMINATION OF ASSISTANCE

Outreach service providers must have a written program termination policy that describes the reasons a household may be terminated from participation, the notification process, and assurance the household will be made aware of the grievance process.

If a participant violates program requirements, the grantee may terminate assistance in accordance with the formal process established through the policy. Service providers must exercise judgment and examine all extenuating circumstances in determining when violations warrant termination so that a participant's assistance is terminated only in the most severe cases.

Program termination does not bar Outreach programs from providing further assistance at a later date to the same household.

2.4 PERFORMANCE MEASUREMENT

2.4.1 DATA COLLECTION AND DOCUMENTATION REQUIREMENTS

2.4.1.1 STANDARD HMIS DOCUMENTATION REQUIREMENTS

HMIS Entry and Exit Data Collection Requirements
• HMIS Participant Profile / Basic Information • HMIS Program Entry • HMIS Program Exit

2.4.1.2 ADDITIONAL DOCUMENTATION REQUIREMENTS

Outreach programs that are part of CE and conducting CE activities should strive to collect documentation from those seeking assistance. Documentation to collect includes:

- Homelessness status verification
- Income verification (i.e., paystubs, Supplemental Security Income (SSI) Social Security Disability Insurance (SSDI), etc.)
- Personal identification
- Disability verification, if applicable and available

Staff conducting Outreach who are not a CE agency are not required to obtain identifying or supporting documentation from people with whom they are engaging. However, completion of homelessness status verification, income verification, personal identification, and other documents will facilitate more efficient housing resource connections.

Service and Assistance Records
- Documentation of services and assistance provided to that participant. Where applicable, compliance with the termination of assistance requirement.
- Documentation of the types of supportive services provided under the service provider's program and the amounts spent on those services. The service provider or subservice provider must keep record that these records were reviewed at least annually and that the service package offered to participants was adjusted as necessary.
- Programs should also consider keeping a log of households that were not eligible. Such documentation would show a monitor/auditor that the time spent by personnel is reasonable, particularly in periods of very low number of eligible households being served but with a high level of salaries. This practice is recommended for any activities that might result in a low amount of assistance delivered, as it would demonstrate the program is incurring legitimate costs for the program.

2.4.1.3 DOCUMENTATION COLLECTION

Programs should begin working with participants to collect documentation at enrollment. If documentation has not been collected within 45 days, programs are not required to terminate participants from the program, but they may elect to do so. If documentation is not required until

sometime after enrollment, then programs may not terminate until 45 days after the documentation deadline. Programs must document their efforts to obtain eligibility documentation during this period and should only terminate participants as a last resort. Any information collected during this period should be updated in HMIS and any documentation collected should be scanned and uploaded into HMIS, so the participant record is as accurate as possible, and a more appropriate referral can be made.

In general, Third-Party source documentation should always be sought first. If it cannot be obtained, Third-Party Written or Oral Verification should be sought (with a preference for written documentation). If neither can be obtained, then efforts to collect all types of Third-Party documentation should be recorded and Self-Certification shall be obtained from the participant and kept in the Participant File. See Appendix C-4 and C-5 for sample forms.

2.4.2   METRICS

The following measures are typically used to evaluate the performance of HCRS programs. Measures may be added or amended based on specific funding source requirements, CoC priorities, or evaluation strategies.

Category	Metric
	All Funding Sources
Outreach Program Outcomes	Number of people served
	Number of Street Outreach contacts per FTE, per month (duplicated)
	Exits to positive outcomes from Street Outreach
	No less than 50% of households shall be connected to Coordinated Entry
Data Collection and Reporting	Percentage of HMIS data that is complete and accurate
	Percentage of HMIS data that is entered within 5 business days from initial collection
Contract Management	Percentage expenditure of funds
	Percentage of Contract Payment Requests submitted accurately and on time

Where practicable, the Program Outcomes above will also be evaluated to assess for the presence of any discrepancies or disparities across demographic categories (gender, race, ethnicity, and age tier).

2.5   ELIGIBLE ACTIVITIES

2.5.1   ELIGIBLE ACTIVITIES OVERVIEW

Funds may be used to provide engagement, case management, and immediate needs as necessary to help participants connect with Emergency Shelter, housing, and other critical health services. Eligible cost categories are included in the table below.

Outreach	ARPA
ELIGIBLE ACTIVITIES	
Project Operations	
Costs Associated with Payroll	
Engagement	X
Housing Search and Placement	X
Housing Stability Case Management	X
HMIS Data Collection and Entry	X
Services to Special Populations	
Sub-Contracted Services	X
Supportive Service Costs	
Child Care	X
Credit Repair - budgeting/money management	X
Emergency Mental Health Services	X
Emergency/Outpatient Health Services	X
Life Skills	X
Mediation	X
Substance Abuse Treatment Services	X
Transportation	X
Other Program Costs	
General Liability Insurance	X
Office Internet	X
Office Space	X
Office Supplies	X
Office Utilities	X
Staff Training/Conference/Per Diem	X
Telephone	X
Administrative Expenses	
Advertising	X
Communications	X
Facilities Maintenance & Repairs	X
Insurance	X

Outreach	ARPA
Machinery & Equipment	X
Office & Operating Supplies	X
Personnel Salaries & Benefits	X
Professional Services	X
Public Utilities	X
Small Tools & Minor Equipment	X

2.5.2 DETAILED ELIGIBLE ACTIVITIES

Eligible ARPA-funded Outreach activities are summarized in the table below. Other costs may be approved by the County on a case-by-case basis. Please contact PCHS Homeless Programs for further information.

ARPA-Funded Program Eligible Costs
Operations
Costs Associated with Payroll

• **Housing Search and Placement Services:** services or activities designed to assist households in locating, obtaining, and retaining suitable housing, tenant counseling, assisting households to understand leases, inspections, securing utilities, making moving arrangements, and representative payee services concerning rent and utilities.
     o Includes intake and assessment (time spent assessing a household), whether or not the household is determined eligible
     o Includes mediation and outreach to property owners/landlords related to locating or retaining housing
 	
 • **Housing Stability Services:** This includes developing an individualized housing and service plan, monitoring and evaluating household progress, identifying creative and immediate housing solutions outside of the traditional homeless service system (Diversion), SSI/SSDI Outreach, Access, and Recovery (SOAR), and assuring that households' rights are protected.
 	
 • **HMIS Data Collection and Entry:** staff and benefits for activity; must be directly attributable to project
 • **Sub-Contracted Services:** includes temporary employees contracted through an agency or third-party providers paid by the service provide to provide direct service.
 • **Other costs:** as approved in advance by the County

Supportive Service Costs – All activities below MUST be directly related to a household's ability to obtain or maintain permanent housing.

• **Child Care:** The costs of establishing and operating childcare, and providing childcare vouchers, for children from families experiencing homelessness, including providing meals and snacks, and comprehensive and coordinated developmental activities, are eligible.
     o The childcare center must be licensed by the jurisdiction in which it operates in order for its costs to be eligible.
     o Children must be under the age of 13, unless they are disabled children. Disabled children must be under the age of 18.

- **Credit Repair:** including budgeting or money management
- **Education Services:** The costs of improving knowledge and basic educational skills are eligible. Services may include instruction or training in consumer education, health education, substance abuse prevention, literacy, English as a Second Language, and General Educational Development (GED).
  - Component services or activities are screening, assessment and testing; individual or group instruction; tutoring; provision of books, supplies, and instructional material; counseling; and referral to community resources.
- **Employment Assistance:** The costs of establishing and operating employment assistance and job training programs are eligible, including classroom, online and/or computer instruction, on-the-job instruction, services that assist individuals in securing employment, acquiring learning skills, and/or increasing earning potential. The cost of providing reasonable stipends to participants in employment assistance and job training programs is also an eligible cost.
  - Learning skills include those skills that can be used to secure and retain a job, including the acquisition of vocational licenses and/or certificates. Services that assist individuals in securing employment consist of:
    - Employment screening, assessment, or testing
    - Structured job skills and job-seeking skills
    - Special training and tutoring, including literacy training and pre-vocational training
    - Books and instructional material
    - Counseling or job coaching
    - Referral to community resources
- **Legal Services:** Eligible costs are the fees charged by licensed attorneys and by person(s) under the supervision of licensed attorneys, for advice and representation in matters that interfere with the homeless individual or family's ability to obtain and retain housing.
- **Life Skills**
- **Mediation**
- **Mental Health Services:** Eligible costs are the direct outpatient treatment of mental health conditions that are provided by licensed professionals. Component services are crisis interventions; counseling; individual, family, or group therapy sessions; the prescription of psychotropic medications or explanations about the use and management of medications; and combinations of therapeutic approaches to address multiple problems.
- **Outpatient Health Services:** Eligible costs are the direct outpatient treatment of medical conditions when provided by licensed medical professionals including:
  - Providing an analysis or assessment of an individual's health problems and the development of a treatment plan
  - Assisting individuals to understand their health needs
  - Providing directly or assisting individuals to obtain and utilize appropriate medical treatment
  - Preventive medical care and health maintenance services, including in-home health services and emergency medical services
  - Provision of appropriate medication
  - Providing follow-up services
  - Preventive and non-cosmetic dental care
- **Substance Abuse Treatment Services:** The costs of participant intake and assessment, outpatient treatment, group and individual counseling, and drug testing are eligible. Inpatient detoxification and other inpatient drug or alcohol treatment are ineligible.

• **Transportation** – includes costs for client transportation, reimbursement for staff travel to meet with or assist a client
    ◦ Bus tickets/token or pass
    ◦ Reimbursement or direct payment for gas (client)
    ◦ Reimbursement for mileage (staff)
    ◦ Gas cards are NOT eligible
• **Other costs:** as approved in advance by the County

Other Program Costs
• **General Liability Insurance**: also includes automobile insurance • **Office Internet, Space, Supplies, Utilities, and Phone:** when directly attributable to the project • **Training or Conferences**: related to service delivery, including travel and per diem • **Other costs** as approved by the County.
Administrative Expenses

Administrative Expense are costs an organization incurs that are not directly charged to a specific function or program but are related to the organization as a whole. Administrative Expenses may not exceed 10% of the Direct Program costs (Rental Assistance + Program Operations). Costs may include:
• **Advertising**
• **Communications**
• **Facilities Maintenance & Repairs**
• **Insurance**
• **Machinery & Equipment**
• **Office & Operating Supplies**
• **Personnel Salaries & Benefits**, including:
    ◦ Executive Staff
    ◦ Human Resources
    ◦ Accounting
    ◦ Legal
• **Professional Services**
• **Public Utilities**
• **Small Tools & Minor Equipment**
• **Other costs:** as approved in advance by the County

2.5.3   INDIRECT COSTS

Indirect costs are not eligible within ARPA.

2.5.4   SUBMITTING FOR COST REIMBURSEMENT

Pierce County administers its grants on a cost reimbursement basis only. Service providers may only request reimbursement for eligible costs (as defined in this section, by fund source) and for which they have included in their contract budget. Requests for reimbursement must be submitted on the County-provided invoice document, called a Contract Payment Request form (CPR). CPRs must be submitted to PCCCHMLSInv@piercecountywa.gov within 21 working days following the month in which the expenditures were incurred. The submission of incomplete or inaccurate information may delay the reimbursement process.

The expectation for supporting documentation for reimbursement of costs will be determined by the service provider's fiscal and accounting infrastructure:

- **For service providers that have an accounting system or software** that produces expense reports, the expectation would be an expense report with all costs easily identified, where costs requested for reimbursement are clearly classified from other agency costs, is required. Attach this report to the reimbursement request. The Provider will retain documents and actual receipts reflected in the expense report and be available for monitoring from Pierce County Human Services Contract Monitors, State Auditors and Federal Reviews as applicable.

- **For Providers that do not have an accounting system or software** that produces expense reports, the expectation is copies of receipts, and paid invoices will be provided with each payment request. The Provider will retain the original documents and actual receipts to be available for monitoring from Pierce County Human Services Contract Monitors, State Auditors and Federal Reviews as applicable.

All service providers are to complete the Salaries and Benefits Tab in the invoice template to clearly identify the portion of employee costs being requested. Proof that employees worked for the agency during the time period of the reimbursement request is required, so pay stubs (redact personal information) or a payroll report is required in addition to completing the Salaries and Benefits tab.

2.6 ADDITIONAL RESOURCES

This manual utilizes the Homeless Housing Program Policy and Operations Manual Appendix, which is available here: https://www.piercecountywa.gov/7587/Homeless-Program-Policies.

2.6.1 RELATED MANUALS AND RESOURCES

Resource	Link
ARPA Final Rule	Federal Register: Coronavirus State and Local Fiscal Recovery Funds
San Diego Homeless Outreach Work Best Practices	https://www.sandiegocounty.gov/content/dam/sdc/hhsa/programs/bhs/TRL/TRL Section 2/HOW_BestPractices.pdf
North Carolina Balance of State CoC Program Standards for Street Outreach	https://www.ncceh.org/media/files/files/3c2feb04/street-outreach-written-standards-final_DAXXKGy.pdf
Strategy on the Streets: Improving Los Angeles Outreach Program	https://lacontroller.org/wp-content/uploads/2019/08/Strategy-on-the-Streets_Improving-LAHSAs-Outreach-Program_8.28.19.pdf
HUD Guidance for Outreach Worker's Third-Party Observation Documentation of Homeless Status	https://www.hudexchange.info/faqs/2758/how-can-encounters-with-the-individual-or-head-of-household-by-the-outreach/
HUD Resource page on Chronic Homelessness	https://www.hudexchange.info/homelessness-assistance/resources-for-chronic-homelessness/
Defining "Chronically Homeless" Final Rule	https://www.hudexchange.info/resource/4847/hearth-defining-chronically-homeless-final-rule/
Flowchart of HUD's Definition of Chronic Homelessness	https://www.hudexchange.info/resource/5181/flowchart-of-huds-definition-of-chronic-homelessness/
Sample Chronic Homelessness Documentation Checklist	https://www.hudexchange.info/resource/5182/sample-chronic-homelessness-documentation-checklist/

2.6.2 REQUIRED FORMS

Form	Appendix Item
CHG Third-Party Verbal Documentation of Housing status, Chronicity, or Income Form	C-4
CHG Self-Declaration of Housing Status or No Income Form	C-5

2.6.3 REFERENCED APPENDICES

Item	Appendix Item
HUD Homeless Definition & Documentation Resource	A-2