AMERICAN RESCUE PLAN ACT
POLICY AND OPERATIONS MANUAL

CHAPTER 3: EMERGENCY SHELTER

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CHAPTER 3: EMERGENCY SHELTER

3.1 OVERVIEW OF EMERGENCY SHELTER

3.1.1 DEFINITION

Emergency Shelter provides a short-term temporary place to stay for persons or households experiencing homelessness. The following are types of Shelter programs in Pierce County:

1. **Day Shelter:** Facility that is open during regular day-time hours for the purpose of meeting basic needs for persons experiencing homelessness or connecting them to services. This includes food, respite, hygiene services, connection to Coordinated Entry (CE), referral to mainstream and supportive services, or problem solving to meet the person's housing needs, all while employing a housing first approach.

2. **Same-Day (or Drop-in) Shelter:** Facility with the primary purpose of providing short-term, temporary overnight Shelter for persons experiencing homelessness that does not require occupants to sign leases or occupancy agreements. Same-Day Shelters are those which offer facility-based, night by night, living arrangement that allows households to enter and exit on an irregular or daily basis. Same-Day Shelters are required to work collaboratively with the CE providers to support the provision of the CE activities on site including screening, Diversion, and Prioritization.

   o **Safe Parking:** A parking lot in which people experiencing homelessness are permitted to park and remain in their vehicle overnight without penalty. Security and hygiene stations may also be available at the site. Typically, no services are provided on-site, though street outreach may attempt to engage households in services.

   o **Sanctioned Encampments:** Outdoor camps in area approved by the jurisdiction and the landowner to host people experiencing homelessness in tents or some other temporary structure. Must include security, hygiene stations, and services provided by a non-profit organization. Sanctioned Encampments must be designed to evolve into a more durable/non-temporary shelter model (e.g., tiny house style villages or similar).

3. **Continuous-Stay Shelter:** Facility with the primary purpose of providing short-term, temporary overnight Shelter for persons experiencing homelessness that does not require occupants to sign leases or occupancy agreements. Continuous-Stay Shelters are those which are facility-based where households have a room or bed assigned to them for a limited time, typically up to 90 days.

3.1.2 GOALS AND OBJECTIVES

Emergency Shelter programs empower families and individuals experiencing homelessness to regain permanent housing as quickly as possible while providing a safe place to sleep and housing-focused case management services. The objective of the Shelter system is to provide immediate respite for households that are experiencing literal homelessness and/or fleeing violence. While in Shelter, the programs aim to either provide housing-focused case management or to coordinate such services if the person or household is matched to a CE housing resource.

Desired results of Emergency Shelter include:

- Prioritize entry for households that have no other safe alternatives (Day Shelters exempt)

- Offer Diversion Conversations to all households seeking Shelter

- Provide housing-focused case management to support the attainment of permanent housing (Day Shelters exempt)

- Connecting households to mainstream resources and benefits for which they may be eligible

3.1.2.1   EXPECTATIONS FOR EMERGENCY SHELTER

All Emergency Shelter project types should coordinate with and support the Pierce County Dept of Emergency Management to deliver necessary day shelter services during emergencies, including seasonal weather response, as appropriate.

DAY SHELTER

- Day Shelter projects must either provide directly or facilitate access to Coordinated Entry activities on-site, including diversion and prioritization assessment.

- Day Shelter projects must either provide directly or facilitate access to basic needs, medical, and behavioral health services.

SAFE PARKING/SANCTIONED ENCAMPMENTS

- Coordinated with outreach teams for service delivery.

- During inclement weather seasons, connect participants to warming/cooling centers, as appropriate.

OVERNIGHT SHELTER

- Overnight Shelter projects must either provide directly or facilitate access to Coordinated Entry activities on-site, including diversion and prioritization assessment. Though Overnight Shelters targeting Domestic Violence Survivors are not measured on this outcome, the County expects such programs to offer connection to CE to all its shelter participants.

- Overnight Shelter project must work collaboratively with permanent housing and Coordinated Entry providers (as applicable) to help shelter participants move to permanent housing as rapidly as possible. Meaning, it is the County's expectation that all OS households will be offered a diversion conversation with a CE trained staff member.

- Overnight Shelter support services should seek to compliment and supplement supportive services provided by other agencies, focusing primarily on meeting basic needs and services/supports that will help participants exit to permanent housing as smoothly as possible.

- For any participants in Overnight Shelter who are not receiving any other housing focused assistance, the project shall also provide such assistance, including housing locator assistance, which will help the participant develop a housing plan and exit to permanent housing.

3.1.3   PARTICIPATION IN COORDINATED ENTRY

Service providers should partner with Coordinated Entry to ensure that Shelter participants have access to services that can quickly re-stabilize their housing situation (i.e., link with permanent housing).

Shelter Type	CE Referral Policy
Day Shelter	No CE referral required.
Same-Day Shelter	Not required to accept referrals but must coordinate with CE by either becoming a Certified Partner in CE or by coordinating access to CE at their site.
Continuous-Stay Shelter	Must accept referrals from CE and must accept at least 95% of the households referred by CE for admission.

3.1.3.1   EXCEPTIONS TO PARTICIPATION IN CE

Victim service providers may choose to not use CE for referrals.

3.2   ELIGIBILITY AND TYPICAL SERVICE FLOW

3.2.1   ELIGIBILITY REQUIREMENTS: FOR PROGRAM ENTRY

3.2.1.1   STANDARD ELIGIBILITY

Within Pierce County, coordination among homeless service providers occurs primarily through CE for housing assistance. Households experiencing a housing crisis in Pierce County are directed to use CE. Exceptions are made for households at Emergency Shelters (that offer same-day entry). As noted above, Shelter providers that offer same-day entry may screen and serve households before they have gone through CE. However, Shelter providers must partner with CE to ensure participants have access to services that can quickly re-stabilize their housing situation.

Eligibility for Emergency Shelter may be evaluated by individual providers as long as it is in accordance with ESG guidelines (see 24 CFR 576.401). Households must meet the following conditions:

1. 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[1].

2. Households must meet an Income Standard. Eligibility varies dependent on fund source. Please see Additional Eligibility Requirements Specific to Funding Source below.

3.2.1.2   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 ES programs: • Households eligible for ARPA-funded resources must meet income requirements of at or below 50% Area Median Income.

3.2.2   ELIGIBILITY RE-CERTIFICATION: REQUIREMENTS FOR ENROLLED HOUSEHOLDS

There are no eligibility re-certification requirements for Emergency Shelter programs.

3.2.3   TYPICAL SERVICE FLOW

Emergency Shelters in Pierce County operate autonomously, and while the flow of services may vary, the flow described below identifies the general elements that must be provided by each Shelter type.

Shelter Type	Typical Service Flow
Day Shelter	1. **Data Collection:** Day Shelters collect some basic information from individuals or households who utilize their facilities.

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[1] See Appendix A-2 for details.

	2. **Daytime Respite**: After basic information is collected, Day Shelters provide households with a safe place to be, away from the elements. 3. **Service/Resource Connections**: Basic need resources are either available at the Day Shelter, or households can be connected with other resources they may need.
Same-Day Shelter, Safe Parking or Sanctioned Encampment	1. **Conduct and/or Coordinate Diversion Activity:** When a household contacts Emergency Shelter, Shelter staff at Certified Partner agencies will first have a Diversion discussion with the household (in person or over the phone) to explore natural resources available to the household to help them self-resolve their homelessness and offer support in utilizing those natural resources as appropriate, so they do not have to enter Emergency Shelter. Shelter staff at agencies that are not Certified Partners will coordinate with a CE provider to ensure access to a Diversion engagement. Additional information regarding Diversion strategies, housing solutions, and financial assistance may be found in **Homeless Housing Program Policy and Operations Manual Chapter 3**. 2. **Data Collection / Shelter Enrollment:** Once it is determined the household will enter Emergency Shelter, Shelter staff will enroll the household into the Emergency Shelter program in HMIS. 3. **Overnight Respite:** Shelter staff will provide sleeping arrangements and meals and ensure participant safety. 4. **Housing Stability Plan Development**: Shelter staff will meet in-person to assess for needs and develop a Housing Stability Plan with all Shelter participants residing in Shelter longer than 5 days. Shelter staff will upload a copy of these documents into the participant's profile in HMIS. Shelter staff will create a publicly viewable note that contains a summary of the meeting and housing plan. Additional details regarding the Housing Stability Plan may be found in **Section 3.3.4.3**. 5. **Permanent Housing Connections**: Shelter staff apply the practices of progressive engagement with all participants and develop Housing Stability Plans that rely first on the participant's own resources and networks, and then use the least amount of system resources needed to move the participant to permanent housing. Linkages may include Diversion housing solutions, Critical Time Intervention (CTI), Rapid Re-Housing (RRH), or Permanent Supportive Housing (PSH). 6. **Program Exit**: Upon exit from Shelter, Shelter staff will close out all agency paperwork according to agency procedures and exit the household from the Emergency Shelter program in HMIS.
Continuous-Stay Shelter	1. **Receive Referrals:** Continuous stay Shelters must accept referrals from CE. When the Shelter has a vacancy, it must be posted on

the Daily Vacancy Tracking Sheet (or similar vacancy tracking mechanism) for CE to fill. CE will acknowledge the program opening and refer the highest qualifying priority household. The Shelter may deny any referrals that they are unable to contact after at least 3 attempts within 72 hours.

2. **Data Collection / Shelter Enrollment:** Once it is determined the household will enter Emergency Shelter, Shelter staff will enroll the household into the Emergency Shelter program in HMIS.

3. **Overnight Respite:** Shelter staff will provide sleeping arrangements and meals and ensure participant safety.

4. **Housing Stability Plan Development**: Shelter staff will meet in-person to assess for needs and develop a Housing Stability Plan with all Shelter participants residing in Shelter longer than 5 days. Shelter staff will upload a copy of these documents into the participant's profile in HMIS. Shelter staff will create a publicly viewable note that contains a summary of the meeting and housing plan. Additional details regarding the Housing Stability Plan may be found in **Section 3.3.4.3**.

5. **Permanent Housing Connections**: Shelter staff apply the practices of progressive engagement with all participants and develop Housing Stability Plans that rely first on the participant's own resources and networks, and then use the least amount of system resources needed to move the participant to permanent housing. Linkages may include Diversion housing solutions, RRH, or PSH.

6. **Program Exit**: Upon exit from Shelter, Shelter staff will close out all agency paperwork according to agency procedures and exit the household from the Emergency Shelter program in HMIS. The Shelter will then post a new vacancy when the bed space is available.

3.3 POLICIES AND STANDARDS

3.3.1 LOCAL, STATE, AND FEDERAL REGULATIONS

Emergency Shelter programs are governed by an array of state, local, and federal regulations. In addition to the regulations in **Section 1.3: Universal Policies and Standards**. This is not an exhaustive list; it is the responsibility of each individual grant recipient to ensure they are in compliance with all applicable local, state, and federal regulations. In instances where regulations overlap, grant recipients must comply with the more stringent of the applicable regulations.

3.3.2 HABITABILITY STANDARDS FOR SHELTER FACILITIES

All Emergency Shelters must maintain safe and sanitary facilities. Any Emergency Shelter that receives ARPA funds for Shelter operations must maintain compliance with 24 CFR 576.403 Shelter and Housing Standards and comply with the following minimum safety, sanitation, and privacy standards[2]:

- **Structure and Materials.** The Shelter building must be structurally sound to protect residents from the elements and not pose any threat to health and safety of the residents. Any renovation (including major rehabilitation and conversion) carried out with ESG assistance must use Energy Star and WaterSense products and appliances.

- **Access.** The Shelter must be accessible in accordance with Section 504 of the Rehabilitation Act (29 U.S.C. 794) and implementing regulations at 24 CFR part 8; the Fair Housing Act (42 U.S.C. 3601 et seq.) and implementing regulations at 24 CFR part 100; and Title II of the Americans with Disabilities Act (42 U.S.C. 12131 et seq.) and 28 CFR part 35; where applicable.

- **Space and Security.** Except where the Shelter is intended for day use only, the Shelter must provide each program participant in the Shelter with an acceptable place to sleep and adequate space and security for themselves and their belongings.

- **Interior Air Quality.** Each room or space within the Shelter must have a natural or mechanical means of ventilation. The interior air must be free of pollutants at a level that might threaten or harm the health of residents.

- **Water Supply.** The Shelter's water supply must be free of contamination.

- **Sanitary Facilities.** Each program participant in the Shelter must have access to sanitary facilities that are in proper operating condition, are private, and are adequate for personal cleanliness and the disposal of human waste.

- **Thermal Environment.** The Shelter must have any necessary heating/cooling facilities in proper operating condition.

- **Illumination and Electricity.** The Shelter must have adequate natural or artificial illumination to permit normal indoor activities and support health and safety. There must be sufficient electrical sources to permit the safe use of electrical appliances in the Shelter.

- **Food Preparation.** Food preparation areas, if any, must contain suitable space and equipment to store, prepare, and serve food in a safe and sanitary manner.

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[2] Additional information may be found at: https://www.hudexchange.info/resource/3766/esg-minimum-habitability-standards-for-emergency-Shelters-and-permanent-housing/.

- **Sanitary Conditions.** The Shelter must be maintained in a sanitary condition.

- **Fire Safety.** There must be at least one working smoke detector in each occupied unit of the Shelter. Where possible, smoke detectors must be located near sleeping areas. The fire alarm system must be designed for hearing-impaired residents. All public areas of the Shelter must have at least one working smoke detector. There must also be a second means of exiting the building in the event of fire or other emergency.

This policy does not exempt Shelters from having to be compliant with local housing codes. Therefore, if there are requirements that are in both the local housing code and the minimum standards above, the service provider must comply with the more stringent of the two. Additionally, to prevent lead poisoning in young children, Shelter operators must comply with the Lead-Based Paint Poisoning Prevention Act of 1978 and its applicable regulations found at 24 CFR 35, Parts A, B, M, and R. Please see Appendix B-1 for more information on Lead-Based Paint Visual Assessment Requirements.

3.3.3   REQUIRED PROGRAM POLICIES

3.3.3.1   EMERGENCY SHELTER STANDARD OPERATING PROCEDURES

All Emergency Shelters are responsible for developing their own Standard Operating Procedures (SOPs) regarding:

1. Admission
2. Diversion
3. Referral
4. Discharge

This includes domestic violence service providers, which adhere to statewide standards for provision of services. At a minimum, these policies must be person-centered, trauma-informed, and based in Housing First approaches. SOPs must be publicly available and must include the Shelter's policies. In addition, service providers are responsible for developing detailed procedures to operate Shelter in accordance with the policies and standards in this Manual.

3.3.4   SERVICE STANDARDS

3.3.4.1   PRIORITIZATION

When there is insufficient Emergency Shelter capacity to meet the need of households experiencing homelessness in Pierce County, Shelter admission should be reserved for unsheltered households who are at greatest risk for severe health and safety consequences.

3.3.4.2   FACILITATION OF CONNECTION TO COORDINATED ENTRY

Emergency Shelters are expected to facilitate a connection to Coordinated Entry for their participants. This may be facilitated by either certifying staff in CE to offer service on-site, or by coordinating with another certified CE partner organization.

Emergency Shelters are encouraged to reference **Homeless Housing Program Policy and Operations Manual Chapter 3: Coordinated Entry** for information regarding required policies related to Diversion and Referrals, as well as program standards. In addition, service providers are responsible for developing detailed procedures to facilitate connection to CE in accordance with the policies and standards in this

Manual. Victim service providers of Emergency Shelter must offer the opportunity to connect with Coordinated Entry but will not be measured on the rate of connection to CE.

3.3.4.3 HOUSING STABILITY SERVICES AND PLANS

Diversion Next Steps Plans and Housing Stability Plans outline the household's goals and action steps for obtaining permanent housing as quickly as possible. All Overnight Emergency Shelters are expected to support households in the development and pursuit of a Diversion Next Steps Plan or a Housing Stability Plan. In the case of Certified Partner agencies, the Shelter will initiate the development of the Diversion Next Steps Plan; in the case on non-Certified agencies, the Shelter will support the execution of Diversion Next Steps Plans that are initiated by CE.

Households that do not identify a Diversion Plan are encouraged to develop a Housing Stability Plan that first utilizes the household's own resources and networks to gain permanent housing, but that also identifies a back-up plan for moving to permanent housing. Shelter Case Managers are encouraged to use Motivational Interviewing, Housing-Focused Case Management, and Progressive Engagement strategies to assist households in identifying ways in which they can move out of Shelter and into permanent housing.

Shelter staff will develop Housing Stability Plans that contain the following at a minimum:

1. **Housing Goals:** Concrete plan and action steps for moving to housing other than the Shelter, ideally to permanent housing.

2. **Linkages to Mainstream Resources:** Goal and action steps related to obtaining all public/ mainstream benefits to which the participant is entitled. This may include steps towards obtaining or maintaining income through education, employment, job training and/or financial counseling. It may also include linkages to needed physical, mental and/or behavioral health services and supports.

When developing Housing Stability Plans for households, Shelters should help households consider:

- *The Household's Own Resources and Networks to Gain Permanent Housing:* Some households may have housing options available to them, such as returning to doubled-up housing options. For some households, this may be more appropriate than moving into a unit of their own. This is particularly true of fixed income households or those waiting to receive benefit determinations (such as those waiting on SSI/SSDI applications or appeals). Shelter Case Managers are encouraged to have open conversations with these households about rent costs and their current income, and the time-limited nature of the RRH program. If doubling-up or room sharing is an option for these households, it may be more appropriate to develop a Housing Stability Plan for this option.

- *Preparing for RRH Intake and Housing Search:* Households eligible for Rapid Re- Housing should begin working with their Shelter Case Manager to prepare for their first intake appointment with the RRH provider. This includes compiling and preparing the needed documents, working through the household's budget, identifying apartment needs/ logistics for the household, and ensuring that all current benefits are being accessed. Shelter Case Managers should share a copy of the Housing Stability Plan and the participants' progress on it with the RRH provider once the household receives a referral. Shelter staff are also encouraged to attend the participant's RRH

intake session. This way, participants can transition more easily to the RRH program and both Case Managers are up to date on the participant's case.

- *Identifying Potential Barriers to Obtaining Housing*: Shelter Case Managers can help participants prepare for RRH by helping to identify elements of a participant's history that may make obtaining housing more difficult, so these can be mitigated if possible and/or discussed with the RRH provider at the first intake appointment. Barriers may include recent criminal history, a history of eviction, outstanding utility debts, very poor or no credit, no income, large family size with no income, or lack of transportation.

- *Preparing Documentation for PSH Eligibility*: Households eligible for Permanent Supportive Housing should begin working with their Shelter Case Manager to prepare the documentation needed for the PSH referral packet and documentation standards.

- *The Household's Needed Supports, Such as Mental Health, Physical Health, Public Benefits, Childcare, etc.*: While in Shelter, households should be developing plans to connect to all benefits and supportive services necessary to maintain permanent housing.

3.3.4.4   FACILITATION OF CONNECTIONS TO RRH OR PSH

When households are referred to either RRH or PSH, Emergency Shelter staff should:

- Collect the required RRH or PSH documentation.

- Upload all relevant case planning documentation (initial and updated Housing Stability Plans, budgets, etc.) to the participant's profile in HMIS so that these documents are readily accessible for review by the RRH or PSH provider.

- Maintain updated notes in HMIS that provide accurate and complete information regarding the participant's housing situation and status in Shelter.

- Attend the RRH or PSH intake meeting with the participant.

- Provide all documentation and case planning information to the RRH or PSH provider.

- Support carrying out the steps of the participant's Housing Stability Plan.

- Keep the RRH or PSH provider informed of the participant's progress on meeting action steps.

- Keep the RRH or PSH provider informed of the participant's location and eligibility for the program and inform the RRH or PSH provider within one business day if the participant does not sleep in the Shelter for more than two nights in a row.

3.3.4.5   DETERMINING TYPE, AMOUNT, AND DURATION OF ESSENTIAL SERVICES, HOUSING STABILIZATION AND/OR RELOCATION SERVICES

All Emergency Shelters must conduct assessments of their participants' needs for essential services, housing stabilization, and/or relocation services. For most Shelters, this will occur at intake or shortly thereafter, and may be a part of the Housing Stability Plan development process. Reassessment of essential service needs should occur at a frequency determined by each provider. In alignment with The CoC's policies, the standard duration of these services should be decided based on the needs of the participant.

3.3.5   PROGRAM EXIT

Households should be exited from the program when: 1) they are no longer eligible for or in need of services, 2) they have completed all goals as outlined in the Housing Stability Plan, 3) they have financial ability to meet basic living needs, or 4) violation of a Program Agreement is discovered. Participant households should not be exited from the program for lack of stability. 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.

3.3.5.1   TERMINATION OF ASSISTANCE

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. To terminate rental assistance or housing stabilization services, the process, at a minimum, must:

- Provide written notice to the participant with a clear statement of the reasons for termination;
- Provide an opportunity for the participant to present written or oral objections before a person other than the person (or subordinate of the that person) who made or approved the termination decision; and,
- Prompt written notice of the final decision to the participant.

If a participant violates program requirements, the service provider 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 programs from providing further assistance at a later date to the same household.

3.4   PERFORMANCE MEASUREMENT

3.4.1   DATA COLLECTION AND DOCUMENTATION REQUIREMENTS

3.4.1.1   STANDARD HMIS DOCUMENTATION REQUIREMENTS

Shelter Type	HMIS Entry and Exit Data Collection Requirements
Day Shelter	- HMIS Participant Profile / Basic Information - HMIS Program Entry (Shelter and, if applicable, Diversion/Diversion Conversation or Priority Pool) - HMIS Program Exit (Shelter and, if applicable, Diversion)
Same-Day Shelter	- HMIS Participant Profile / Basic Information - HMIS Program Entry (Shelter and, if applicable, Diversion/Diversion Conversation or Priority Pool) - Diversion Plan or Housing Stability Plan - Household Budget - HMIS Program Exit (Shelter and, if applicable, Diversion/Diversion Conversation)
Continuous-Stay Shelter	- HMIS Participant Profile / Basic Information - HMIS Program Entry (Shelter and, if applicable, Diversion/Diversion Conversation or Priority Pool) - Diversion Plan or Housing Stability Plan - Household Budget - HMIS Program Exit (Shelter and, if applicable, Diversion/Diversion Conversation) - Shelter Bed Vacancy on Daily Vacancy Tracking Form

3.4.1.2   ADDITIONAL DOCUMENTATION REQUIREMENTS

Households entering Emergency Shelter are exempt from housing/homeless status documentation requirements. However, Emergency Shelter programs should seek to collect and/or provide relevant documentation. Particularly, Emergency Shelter programs can provide Third-Party source documentation of homelessness for other programs.

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.

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.

3.4.1.3   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.

3.4.2   METRICS

The following measures are typically used to evaluate the performance of the Homeless Crisis Response System (HCRS) Emergency Shelter programs. Measures may be added or amended based on specific funding source requirements, CoC priorities, or evaluation strategies.

Category	Metric		
	All Funding Sources	Overnight Continuous Stay Shelters	Day Shelter and Overnight Same Day/Drop-In Shelter
Emergency Shelter Program Outcomes	Percent of beds occupied	Median length of stay from program entry to exit*	Exits to positive outcomes
	Percent of households exiting to permanent housing	Percentage of households successfully diverted from homelessness	
	Returns to homelessness within 2 years after Emergency Shelter exit**		
	Percent of households with a CE enrollment**		

* Victim Service Providers operating Emergency Shelter may have a longer median length of stay target.
** Victim Service Providers operating Emergency Shelter will not be held to these targets.

Category	Metric
	All Funding Sources
	Percentage of HMIS data that is complete and accurate

Data Collection and Reporting	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).

3.5   ELIGIBLE ACTIVITIES

3.5.1   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.

Emergency Shelter	ARPA
ELIGIBLE ACTIVITIES	
Project Operations	
Costs Associated with Payroll	
Housing Search and Placement	X
Housing Stability Case Management	X
HMIS Data Collection and Entry	X
Sub-Contracted Services	X
Supportive Service Costs	
Child Care	X
Credit Repair - budgeting/money management	X
Education Services	X
Employment Assistance	X
Legal Services	X
Life Skills	X
Mediation	X
Mental Health Services	X
Outpatient Health Services	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
Uniform Relocation Assistance	
Facility Support	
Lease Payments	
Lease/Rent on Facility	X
Hotel/Motel	X

Emergency Shelter	ARPA
Move-in Costs to Permanent Housing	X
Other Facility Costs	
Facility Equipment and Supplies	X
Facility Janitorial	X
Facility Maintenance/Repair	X
Facility Security	X
Food served in Facility	X
Off-Site and Residential Facility Management Fees	
Other Costs to Secure Permanent Housing	X
Property Insurance	X
Transportation to the Facility	X
Utilities	X
Administrative Expenses	
Advertising	X
Communications	X
Facilities Maintenance & Repairs	X
Insurance	X
Machinery & Equipment	X
Office & Operating Supplies	X
Personnel Salaries & Benefits	X
Professional Services	X
Public Utilities	X
Small Tools & Minor Equipment	X

3.5.2   DETAILED ELIGIBLE ACTIVITIES

Eligible ARPA-funded Emergency Shelter 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 Case Management:** 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).
  - o   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.
  - o   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.

Facility Support
Lease Payments

- **Lease/Rent on Facility:** Cost of lease/rent for a facility used as emergency shelter.
- **Hotel/Motel:** When used as shelter or waiting for an HQS inspection on a unit.
- **Move-in Costs to Permanent Housing:** Cost of security deposit, first/last month's rent to secure a permanent housing unit
- **Other costs:** as approved in advance by the County

Other Facility Costs

- **Facility Equipment and Supplies:** Essential items for the operation of shelter such as common-use toiletries, bedding, mats, cots, towels, microwave, etc.
- **Facility Janitorial:** Salaries and benefits associated with providing building janitorial services
- **Facility Maintenance and Repairs:** Includes janitorial/cleaning supplies, pest control, fire safety, materials and contract or staff maintenance salaries/benefits associated with providing the maintenance, mileage for maintenance staff

- Maintenance activities include cleaning activities, protective or preventative measures to keep a building, its systems and its grounds in working order and replacement of existing appliances or objects that are not fixtures or part of the building. Maintenance activities should fix, but not make improvements that would add value to the building
- Maintenance activities do not include the repair or replacement of fixtures or parts of the building. A fixture is an object that is physically attached to the building and cannot be removed without damage to the building. Fixtures also include, but are not limited to kitchen cabinets, built-in shelves, toilets, light fixtures, staircases, crown molding, sinks, and bathtubs. Maintenance activities do not include the installment or replacement of systems designed for occupant comfort and safety such as HVAC, electrical or mechanical systems, sanitation, fire suppression, and plumbing.

- **Facility Security:** Salaries and benefits associated with providing building security
- **Food Served in Facility**
- **Off-site and Residential Facility Management Fees:** Related to the operation of the emergency shelter
- **Other Costs to Secure Permanent Housing:** Includes application fees, background checks, credit check fees, utility deposits, and costs of urinalyses for drug testing of household members if necessary/required for housing
- **Property Insurance:** For the emergency shelter building (mortgage insurance is not eligible)
- **Transportation to the Facility:** Directly related to the transportation of eligible households (bus tokens/tickets, fuel for shelter van)
- **Utilities:** Includes gas/propane, phone, electric, internet, water and sewer, garbage removal
- **Other costs:** as approved in advance 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

3.5.3 INDIRECT COSTS

Indirect costs are not eligible within ARPA funding awards.

3.5.4   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.

3.6   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.

3.6.1   RELATED MANUALS AND RESOURCES

Resource	Link
ARPA Final Rule	Federal Register: Coronavirus State and Local Fiscal Recovery Funds

3.6.2   REQUIRED FORMS

Form	Appendix Item
Daily Vacancy Tracking Sheet *(Required for Overnight Continuous Stay Shelters only)*	Contact CE Referral provider for access

3.6.3   REFERENCED APPENDICES

Item	Appendix Item
HUD Homeless Definition & Documentation Resource	A-2
Lead-Based Paint Visual Assessment Requirements	B-1
Diversion Next Steps Plan	C-16