



Housing and Homelessness Division  
Kitsap County Department of Human Services

# KITSAP GRANT GUIDELINES for

## Kitsap Eviction Prevention Assistance Program (KEPA)

Including the  
T-RAP 1.0 and 2.0  
(Treasury Rent Assistance Program)  
and  
ERA 1 and ERA 2  
(Eviction Rental Assistance – Treasury Program)

***Version 8/9/2022***

## Contents

<b>Section 1: Overview .....</b>	<b>1</b>
<b>Section 2: Funding Sources .....</b>	<b>1</b>
<b>Section 3: Contracting .....</b>	<b>2</b>
<b>Section 4: Outreach Partner Organization Contracts.....</b>	<b>2</b>
<b>Section 5: Allowable Contract Activities .....</b>	<b>3</b>
<b>Section 6: Allowable Uses of Funds.....</b>	<b>4</b>
<b>Section 7: Allowable Contract Expenses .....</b>	<b>6</b>
<b>Section 8: Reimbursement Requests .....</b>	<b>7</b>
<b>Section 9: Contractor Administrative Requirements .....</b>	<b>11</b>
<b>Section 10: Provision of Services Requirements .....</b>	<b>17</b>
<b>Section 11: Housing and Homelessness Division Complaint Policy and Procedure.....</b>	<b>17</b>

---

## Section 1: Overview

---

The Housing and Homelessness Division of the Kitsap County Department of Human Services was granted emergency Treasury Rental Assistance Program (T-RAP) funding from the Washington State Department of Commerce. In addition, Kitsap County applied directly to the Treasury Department and was awarded funding directly through the Treasury Eviction Rent Assistance program (Treasury ERA). These funds were granted for the purpose of supporting activities that will reduce the likelihood of eviction among low income households, with a focus on ensuring that historically underserved populations have information about and access to this resource.

These Guidelines are intended to provide guidance for organizations that contract with the Division for these grant funds to achieve this purpose.

Note: This project was supported by a grant awarded by US Department of the Treasury. Points of view in this document are those of the author and do not necessarily represent the official position or policies of the US Department of the Treasury. Grant funds are administered by the Coronavirus State Fiscal Recovery Fund thru the Washington State Department of Commerce.

---

## Section 2: Funding Sources

---

NOTE: For the purpose of this document and public outreach, both funding sources will be collectively referred to as “**Kitsap Eviction Prevention Assistance Program (KEPA)**.”

### 2.1 TREASURY RENTAL ASSISTANCE PROGRAM (T-RAP)

Treasury Eviction Rental Assistance Program (T-RAP) funds were granted to Kitsap County Human Services through a contract between the Washington State Department of Commerce and the Kitsap County Housing and Homelessness Division.

The T-RAP program is funded through federal Corona Virus Relief Act funding that was awarded to Washington State. These grant funds are administered by the Kitsap County Housing and Homelessness Division and sub-contracted to eligible service providers. The funds are governed by Commerce’s T-RAP Guidelines and Kitsap County’s T-RAP/ERA Guidelines.

### 2.2 EVICTION RENTAL ASSISTANCE (ERA)

In addition, Kitsap County applied to the federal Treasury Department and received a direct allocation of Eviction Rent Assistance (ERA) funds, which were part of the Corona Virus Relief Act. These funds are also being sub-contracted to eligible service providers. These funds are governed by the Treasury Department Guidance and Kitsap County’s KEPA Guidelines.

---

## Section 3: Contracting

---

KEPA grants are awarded to organizations with two different types of scope of work:

- 1) **Eviction Prevention Assistance Distribution** organizations which work directly with affected households and landlords to accept and process KEPA applications, assist with collection of required documentation, provide eviction prevention assistance funds to landlords directly, track basic household information, and provide required reports; and
- 2) **Outreach Partner** organizations (most of which are “By and For” organizations as defined by Commerce) which work to educate specific target populations about the availability of this eviction prevention assistance through education and outreach, and/or assist these households with making an application through the provision of transportation, translation, assistance with collecting documentation, and other support activities. More information about the Outreach Partner Organization Grants is included in a separate section by that name below.

Contracts are standard Human Services contract templates. Contract processing will be expedited per a Board of Commissioners temporary emergency ordinance that gives the Director of Human Services the authority to sign COVID-19-related emergency contracts.

---

## Section 4: Outreach Partner Organization Contracts

---

### 4.1 Definitions

For the purpose of this program, **Outreach Partner** organizations are organizations that work with specific populations that are historically underserved by programs like KEPA. Their missions specifically include providing resources and services to these populations, which may include marginalized groups such as Black, Native and Indigenous, People of Color, immigrants, people with criminal records, people with disabilities, people with limited English proficiency, people who identify as transgender, people who identify as LGBTQ+, people with mental health and substance use vulnerabilities, and other individuals that may not typically access mainstream support.

Many Outreach Partner Organizations are also **By and For Organizations**. As defined in the Commerce T-RAP Guidelines, By and For organizations are “operated by and for the community they serve. Their primary mission and history is serving a specific community and they are culturally based, directed, and substantially controlled by individuals from the population they serve. At the core of their programs, the organizations embody the community’s central cultural values. These communities may include ethnic and racial minorities; immigrants and refugees; individuals who identify as LGBTQ+, individuals with disabilities or who are deaf; and Native Americans.”

### 4.2 Funding

Commerce has set aside specific funding for Kitsap County to sub-contract with By and For Organizations. There is also some limited funding available for Outreach Partner Organizations that do important work but do not meet the definition of a By and For Organization. All expenses are on a reimbursement basis.

### 4.3 Contracted Activities

Outreach Partner Organizations will work with Kitsap County and the Eviction Prevention Assistance Distribution organizations to educate specific target populations about the availability of this eviction prevention assistance program through education and outreach, and/or assist these households with making an application through the provision of transportation, translation, assistance with collecting documentation, and other support activities.

Outreach Partner Organizations can elect to provide one or both of the following activities:

- 1) **Outreach and Education** – This includes specific activities as a means of advertising the KEPA program with the purpose of encouraging KEPA Applications made through KCR. Activities under this scope may include but are not limited to: holding events, distributing information at existing events or venues, posting on social media, email distributions, and audio/video advertising.
- 2) **Application Assistance** – This includes helping tenants to fill out KEPA applications or procure required documentation, working with landlords to get paperwork completed, and other activities to assist people completing and submitting KEPA applications to KCR. Funds may be used for staff time, printing KEPA Pre-applications, interpreter services for non-English speakers, assistance completing the KEPA Pre-Application, assistance with tenants' providing documentation (immigration status documentation is NOT required), and/or other activities specified in the proposal and contract to best assist the population that they work with.

Any associated activities (outreach/education and application assistance) performed after an organization has reached their maximum contracted number of applications has been reached may not be reimbursed. Although the KEPA program is intended to run through 12/31/22, it is anticipated that funding for rental and utilities assistance will be spent out much sooner.

## Section 5: Allowable Contract Activities

### 5.1 ELIGIBLE ACTIVITIES AND SERVICES

Eligible activities and services for Eviction Prevention Assistance Distribution organizations are identified in Commerce's T-RAP Guidelines and Treasury Guidance.

In addition, eligible activities for Kitsap's Outreach Partner Organizations include:

- Salaries and benefits for staff or contractors performing the activities listed below
- Program supplies to carry out the activities listed below
- Outreach and education activities to populations that are typically under-served by eviction prevention assistance programs (as defined above) about this eviction prevention assistance program, including who is eligible and where to go to access the funds
- Production and printing/copying of materials that advertise the KEPA program
- Social media or electronic publication costs for promoting the KEPA program
- Translation services for non-English speakers
- Transportation services to get eligible households to KEPA appointments
- Providing assistance to tenants filling out KEPA applications or procuring required documentation

- Other activities approved in advance by Kitsap County

All activities must take place during the period outlined in the applicable contracts.

## Section 6: Allowable Uses of Funds

KEPA Grant funds may be only used for purposes outlined in the grant contract, in the amounts indicated in the contract budget, and in compliance with Commerce’s T-RAP Guidelines and Kitsap County’s KEPA Guidelines. Detailed information about allowable expenses is below in the “Allowable Expenses” section.

Shifting grant funds between the budget line items is not allowed unless approved by Kitsap County.

### 6.1 HOUSEHOLD INCOME ELIGIBILITY AND PRIORITIZATION

Household eligibility for the Kitsap Eviction Prevention Assistance Program is outlined in the most current version of Commerce’s T-RAP Guidelines.

In addition, Kitsap County is initially restricting eligibility to households earning 50% or less of Area Median Income (AMI). At some point in the future, Kitsap County may expand eligibility to households earning 80% or less of AMI. AMI is determined by the federal Department of Housing and Urban Development (HUD) for specific geographic areas.

Kitsap County	Number of Persons in Family							
FY 2022 50% Annual Area Median Income Limits (effective 4/18/22)	1	2	3	4	5	6	7	8
	36,050	41,200	46,350	<b>51,450</b>	55,600	59,700	63,800	67,950

Households must meet all three initial screening criteria:

- Households earning 50% or less of Area Median Income (AMI)
- Experiencing Financial Hardship:
  - T-RAP 1.0: Experiencing a financial hardship **directly or indirectly** due to the COVID-19 pandemic which threatens the household’s ability to pay the costs of the rental property when due.
  - T-RAP 2.0: Experiencing a financial hardship **during** the COVID-19 pandemic which threatens the household’s ability to pay the costs of the rental property when due.
- At risk of experiencing homelessness or currently experiencing housing instability.

Priority for receiving eviction assistance shall be given to:

1. Referrals from Eviction Resolution Pilot Program (ERPP) partners and Kitsap Legal Services (KLS)
2. Households with one or more individuals who have been unemployed for the 90 days immediately preceding the application date
3. First-round of receiving KEPA assistance
4. Second-round of receiving KEPA assistance

In addition, applications received by Kitsap Community Resources (KCR) through By and For partner organizations receive priority processing within the priority list above.

## 6.2 FAIR MARKET RENT PAYMENTS

In accordance with T-RAP Guidelines, Distribution Organizations must determine the Fair Market Rent (FMR) on units for which they are providing rent payments, depending on the month the rent is being paid. Distribution Organizations should refer to T-RAP Guidelines for rules regarding the amount of FMR that is allowed to be paid in different situations. The following chart outlines the FMR for Kitsap County.

Final FY 2020 & FY 2021 & FY 2022 FMRs by Unit Bedrooms						
Year	FMR Rate	Efficiency	One-Bedroom	Two-Bedroom	Three-Bedroom	Four-Bedroom
<b>FY 2022 FMR</b> (April 11, 2022 – September 2022)	100% FMR	\$1,174	\$1,368	\$1,765	\$2,435	\$2,909
	150% FMR	\$1,761	\$2,052	\$2,647	\$3,652	\$4,363
<b>FY 2022 FMR</b> (October 2021 – April 10, 2022)	100% FMR	\$1,001	\$1,166	\$1,505	\$2,076	\$2,481
	150% FMR	\$1,501	\$1,749	\$2,257	\$3,114	\$3,721
<b>FY 2021 FMR</b> (October 2020 – September 2021)	100% FMR	\$976	\$1,141	\$1,479	\$2,074	\$2,397
	150% FMR	\$1,464	\$1,711	\$2,218	\$3,111	\$3,595
<b>FY 2020 FMR</b> (October 2019 – September 2020)	100% FMR	\$844	\$1,003	\$1,296	\$1,833	\$2,088
	150% FMR	\$1,266	\$1,505	\$1,944	\$2,750	\$3,132

## 6.3 FUTURE RENT PAYMENTS

Kitsap County is limiting future rent payments to three months. At some point in the future and depending on funding availability, KEPA may be re-opened to households that have already received two months of future rent to receive additional months of future rent.

## 6.4 RETURNING FOR ASSISTANCE

Kitsap County is now allowing a second round of financial assistance, but at a lower priority level. Limitations on the number of months of assistance apply; review the T-RAP Guidelines for rules regarding assistance limits.

## 6.5 FACT-SPECIFIC PROXY

A sub-grantee may rely on a self-declaration from the applicant to document household income if the grantee also uses a fact-specific proxy. A fact-specific proxy is a data set showing average incomes in the household's geographic area.

Grantees can opt to utilize Commerce's approved fact-specific proxy method. Grantees choosing to utilize a different fact-specific proxy method must seek approval from their grant coordinator prior to implementation. For more information about fact-specific proxies, refer to Commerce's T-RAP Guidelines and Treasury Guidance.

## Section 7: Allowable Contract Expenses

Grant funds are divided into several categories, which appear as different budget line items. Contract scopes of work include more details about the anticipated contract activities, which will inform the types of expenses that are eligible and allowed.

Allowable expenses are also contingent on Commerce’s T-RAP Guidelines, Treasury Guidance, and other accompanying Q&A or guidance from these entities.

Outreach Partner Organizations – all expenses will fall under the budget line items titled “By & For Grants” or “Program Administration and Operations,” depending on the type of organization. The appropriate budget line item will be identified in the contract budget. Any purchase of durable physical items must be directly related to KEPA outreach and/or KEPA application assistance AND must be pre-approved but Kitsap County.

Eviction Prevention Distribution Organizations will have multiple budget line items which may be found on the contract budget.

<b>Cost Categories</b>	<b>Definition</b>	<b>Example Expenses</b>
By and For Grants – Outreach and Education  Or  By and For Grants – Application Assistance	Expenses incurred for a wide range of activities which support outreach, education, and direct assistance to diverse underserved populations in applying for rent and utilities assistance.	Including but not limited to: staffing expenses and reimbursement, travel, transportation, driving expenses, printing, advertising, electronic/newsletter publication, and translation services or expenses.
By and For Grants – Potential Bonus - Application Assistance	An additional amount paid for each eligible, verified application submitted to KCR during the month being reported, not to exceed the amount noted in the contract. Payments based on actual performance may not be requested in advance; payment may only be requested for the current monthly reporting period.	For consideration as a valid submitted application, the requirements laid forth in the guidelines and contract must be met.
Rent Assistance	Up to 15 months or 18 months (depending on the funding source; see below) of rent payments in any combination of rental arrears, current rent or future rent through June 30, 2023. Future rent paid is limited to three months.  <ul style="list-style-type: none"> <li>• T-RAP 1.0: Up to 15 months</li> </ul>	Rental arrears, current rent, future rent, late fees



	<ul style="list-style-type: none"> <li>T-RAP 2.0: Up to 18 months</li> </ul> <p>“Other Housing Costs” are allowed but are limited to those specifically allowed by Commerce and/or Treasury. These costs may include internet, relocation expenses, or rental fees (per Commerce’s T-RAP Guidelines).</p>	
Utilities Assistance	Utilities assistance may only be paid for past due amounts. No future payments are allowed.	Utilities assistance to pay arrears and late fees for electricity, gas, water, sewer, waste disposal, and home energy costs (such as fuel oil).
Program Administration and Operations	<p>Operations expenses are directly attributable to this program.</p> <p>Amounts billed to administration must be supported by actual costs.</p>	Salaries & benefits for staff costs, including but not limited to program oversight staff, program staff, HR staff, bookkeeping, and accounting staff. Intake and assessment, outreach services, data collection and entry, office space, utilities, supplies, phone, internet, training related to grant management or service delivery, general liability insurance and auto insurance.

## Section 8: Reimbursement Requests

### 8.1 REIMBURSEMENT REQUEST OVERVIEW

By/For Grants and Program Administration and Operations ONLY grants should be submitted monthly no later than the 14<sup>th</sup> day of the following month.

Reimbursement requests for Rental or Utilities Assistance funds may be submitted as frequently as weekly, using the Kitsap County Eviction Assistance grant reimbursement process detailed below.

No reimbursements will be made in advance of costs or expenses being incurred.

No costs or expenses incurred prior to the effective date of the contract or after its termination are eligible for reimbursement.

Receipts and bills must be itemized and submitted with the reimbursement request. For staff salary and benefits, timesheets signed by the employee must be submitted, unless approved by the Housing and Homelessness Division.

Reimbursement for gift cards or pre-paid cards is not allowed, except with pre-approval by the Housing and Homelessness Division.

## 8.2 REIMBURSEMENT REQUEST PROCESS

Reimbursement requests must be submitted using the following electronic process:

1. **Submit an invoice packet**, including all required paperwork.
  - a. **KEPA reimbursement requests** must be submitted monthly, no later than the 14th of the month.
2. **Go to the Grant Recipient’s Page on the website:**  
<https://www.kitsapgov.com/hs/Pages/HH-Grant-Recipients-page.aspx>
3. **Download the Excel Reimbursement Request Form.** Click the link to KCHHD Reimbursement Request Form to download.
4. **Open the Reimbursement Form Excel:** If you are prompted, please select Enable Content.
5. **Complete the Excel Workbook** in its entirety including **all applicable tabs**.
6. **Submit invoice packet that includes Reimbursement Request Excel File and all required backup documentation via Cognito at this link:**  
<https://www.cognitofrms.com/KitsapCounty1/KCHHDDocumentSubmissionForm>
  - a. Packet must include copies of all itemized receipts, clearly indicating the grant expense(s).
  - b. For Payroll expenses, submit time summaries, documentation of payment, and timesheets signed by employees.
  - c. For mileage please submit a log including the name of the driver, dates traveled, to/from locations, and miles traveled.
  - d. For Rental (Direct) Assistance details of clients and amount of assistance along with proof of payment on behalf of client.
7. **Once you have submitted your reimbursement request, your submission will be reviewed.** If there are errors or questions you will be contacted by email. When your submission is accepted you will receive an email from DocuSign [dse@docusign.net](mailto:dse@docusign.net) with a link “Review your Documents” within the email. Please make sure to check your junk mail and/or make emails from DocuSign a “safe sender” so that you do not miss these emails.
8. **Electronically Sign:** Launch the link from DocuSign email. You will see the submitted form with two signature areas, it will prompt you to ‘Confirm Signature’ to electronically sign the form. Once electronically signed, a pop-up will inform you that you have finished signing – and you will be offered the option to create an account – select “No Thanks” unless you choose to sign up for a free trial. You do not need a personal DocuSign account to complete the reimbursement requests.
9. **Signing Complete:** Once the Request has been signed by both the recipient and County Division staff DocuSign will send an email titled “Completed: KC General Reimbursement Request Form” with a link to the completed document. Use the link in the email to download and retain a copy of your reimbursement request.
10. **Routing for Payment:** Once the approved request is signed by both the Housing and Homelessness Division and Grantee:

- a. Invoice paperwork will be submitted to the County Accounting Department for issuing the payment.
- b. Division staff will submit the invoiced amount for reimbursement from the Department of Commerce.

**11. Payment:** Kitsap County will pay the request for reimbursement within 30 days of its receipt of the completed request.

Repeat this process each time you wish to submit a Reimbursement Request.

Assistance with this process is available by contacting Leah Noldan, [lnoldan@kitsap.gov](mailto:lnoldan@kitsap.gov), or (360) 337-7289.

### 8.3 ELECTRONIC REIMBURSEMENT REQUEST FORM

Below are additional instructions and definitions for each of the required elements of this electronic form.

Invoice # -- Invoices should be sequential numbers, starting with 1 for the first invoice of the contract (e.g. 1, 2, 3, 4).

Grant Funding Source – Indicate whether the funding for the Budget Award is from the Treasury Rent Assistance Program (T-RAP 1.0 or 2.0), Emergency Rental Assistance (ERA 1 or ERA 2), or Eviction Rental Assistance Program (ERAP). This information is available on your contract Budget Exhibit.

Cost Categories – Indicate on the reimbursement request form all the Cost Categories included in your Budget Exhibit. Cost Categories that are not included in your contract Budget Exhibit should not be selected on the reimbursement request form.

*NOTE: If you have more than 1 funding source per cost category, you will need to list the cost category with each associated grant funding source on the request form.*

Budget Awards – Fill in the column completely, based on the cost categories in your contract Budget Exhibit. If you have an amended budget, the Budget Awards Category will reflect the award amount from the initial contract Budget Exhibit.

New Adjusted Budget – This will be left blank, unless you have an approved Contract Amendment, or written approval from the Division Manager. If you have an approved Contract Amendment, you will need to complete both the Budget Award and the New Adjusted Budget fields. If a cost category was added through an amended budget and not present in the initial contract, leave the Budget Award amount blank for the associated Cost Category on the reimbursement request form.

This Request – Enter the amount in each cost category that you are requesting for reimbursement for this period.

*NOTE: This field will perform error-checking by summing the amounts on the SummaryExpenses worksheet. When there is an error the request amount will be formatted in a red and italicized font, when the amounts match the SummaryExpenses worksheet the standard black regular font will be displayed.*

Prior Invoice Cum. To Date –

Refer to the previously approved reimbursement request (prior invoice #) and enter the amount indicated in the “Cum. To Date Including This Request” into the current RR “Prior Invoice Cum. To Date” cell.

If this is the first reimbursement request or if there have not been any expenses prior for this cost category enter \$0.

Cum. To Date Including This Request – This field will automatically calculate. The amount reflected for each cost category should equal the amount entered in the “This Request” field plus the amount entered in the “Prior Invoice Cum. To Date Total” field. The amount indicated in this field will be the amount expended in this cost category to date.

Award Balance – This field will automatically calculate. The amount reflected for each cost category should equal the difference between the “Budget Award” (or “New Adjusted Budget”) field and the “Cum. To Date Including This Report” field. The total indicated in this field will be the amount of award funding remaining on the contract for that cost category.

## 8.4 SUMMARY STATEMENT OF EXPENSES FORM

Statement of Work Performed – Provide a brief description of what the expenses paid for and how they supported the scope of work in the contract. Please also include the number of households were reached through your activities, how many were assisted with completing KEPA applications and/or how many received rental/utility assistance during the reimbursement request period.

Summary of Expenses – List each expense separately. If you have an individual bill, invoice, or receipt from a vendor, it should be listed separately. For KEPA grants, a scanned copy of each bill, invoice, or receipt and proof of payment must be submitted before the reimbursement request can be processed. The backup documentation provided must also be kept on file at your organization for verification during the periodic site visits.

Cost Category – Use the drop down menu to indicate the appropriate cost category for each expense (from the cost categories option on the Reimbursement Request Form).

Description –

This is where you indicate vendor, invoice, receipt, staff mileage and other information.

- Invoice/Bill: List person, company, or organization to whom the expense was paid.
- Rental Assistance: List the landlord to whom the rental assistance was paid and the last name of the client for whom it benefited. If your organization was the landlord, put your organization’s name in the Description column and the last name of the client for whom it benefited, and months covered. (e.g. Housing Agency – Smith, or Glendale Apartments – Jones May-June ‘22)
- Salaries & Benefits: List the last name of the employee who was paid, the pay period dates (Not the date of the paycheck that date will be indicated under “Expenditure Date”).
- Potential Bonus Application Assistance: List the Last Name and First Initial of the Head of Household and the date the application was submitted to KCR. (e.g. Smith, J. 11/13/2022).

Expenditure Date – List the date that the bill, invoice, or payroll was **paid by your agency** (not the date of the bill or invoice).

- By & For Outreach Organizations *only*: If the Expense indicated is “Potential Bonus” then the Expenditure Date will be left blank.

Amount – Indicate the amount paid to the vendor, company, or staff member. *In some cases, this may be less than the total of the bill or invoice. If so, indicate this on the bill or invoice and note as to which RR submitted.*

If you are submitting for mileage multiply the total number of miles by the current IRS standard mileage rate to determine the mileage expense amount.

## 8.5 DOCUMENTATION

For KEPA reimbursement requests, all documentation of expenses must be submitted with each request. See section Reimbursement Request Process #5 for documentation information and the submission process.

## Section 9: Contractor Administrative Requirements

### 9.1 KEPA FORMS AND AVAILABILITY

The KEPA program will use a combination of KEPA-specific forms and T-RAP Forms.

#### KEPA Pre-Application Form

All applicants for KEPA funding must submit the KEPA Pre-application, which will be made available in paper-form at KEPA Distribution Organization offices and online at <http://kcowa.us/kepa>. It will also be available in other locations around the county, as these are arranged. Distribution Organization Staff will use information from the KEPA Pre-Application Form to complete the T-RAP Application Form (or other appropriate rental assistance program application) and other forms required to complete the eviction prevention assistance application packet.

#### KEPA Landlord Agreement Form

For applications submitted before 9/1/2021, before rental payments are made, landlords must sign both the KEPA Landlord Agreement and the T-RAP Rent Payment Agreement.

Applications received on or after 9/1/2021 must use the new T-RAP Landlord Payment Agreement form V4 which includes additional agreement language which replaces the existing Kitsap County KEPA Landlord Agreement form.

#### Other Forms

Distribution Organizations may also need to use other T-RAP forms, such as the Self-Declaration Form, to complete the application packet.

### 9.2 INSURANCE CERTIFICATES

As specified in grant contracts, contractors must provide updated insurance certificates demonstrating coverage limits identified in the contract. An up-to-date insurance certificate must be submitted

electronically to the Housing and Homelessness Division before the first reimbursement request of a contract will be processed.

### 9.3 RISK ASSESSMENTS

The County may conduct a Risk Assessment and develop a monitoring plan for each grantee. A Risk Assessment evaluates the risk of loss resulting from ineffective or failed internal processes, people, systems, or external events that can disrupt the flow of business operations. Risk can refer to both the risk in operating an organization and the processes management uses when implementing, training, and enforcing policies. Overlooked issues and control failures can result in a chain reaction whether small or large. Having a strong risk management system gives funders confidence in allocating grant funds to be used fiscally responsibly.

The Risk Assessment process may include agencies being requested to provide a variety of organizational and financial information, policies, and procedures to the Division if this information was not submitted as part of the response to the RFP or NOFA. These documents may include:

- Financial Policies listed in the section below.
- Organization Information such as an Organizational Chart, Board Meeting Minutes of the last Annual Board Meeting, Meeting Minutes of the most recent Board Meeting, a list of Board Members and their profiles, Organizational Bylaws, and Annual Report.
- Policies and Procedures such as Grievance Procedure, Procurement (Purchasing) Policies & Procedures, Non-Discrimination Policies & Procedures, and Termination and Denial of Services Policy.
- Financial Information such as Agency Budget, Financial Statements, Cash Flow Statements, Audit Documentation, and IRS 990 Tax Return.

If your agency/organization does not have one or more of these in place, please contact the County so we may provide technical assistance.

The County reserves the right to require a grantee to undertake special reviews when a Risk Assessment, audit, or other emerging issue demands prompt intervention and/or investigation.

A Risk Assessment will be done for each sub-contractor within six months of the start date of the contract. The Risk Assessment will be used to determine the frequency of KEPA compliance monitoring.

### 9.4 FINANCIAL POLICIES

It is best practice for any agency/organization that are recipients of public funds to have robust controls and financial management policies.

#### **Board-Approved Fiscal Control Policies & Procedures should include:**

- a. Cash Controls
- b. Expenditure Authorization Process
- c. Separation of Duties and Banking
- d. Account Reconciliation Process
- e. Budgetary Controls
- f. Purchasing/Procurement Procedures
- g. Financial Reporting
- h. Board Oversight
- i. The date of Board approval

### 9.5 COMPLIANCE MONITORING

The Kitsap County Housing and Homelessness Division monitors all projects for compliance with the funding terms and conditions in the contract(s). Monitoring and performance evaluation are generally conducted once per year and may be done in-person or remotely. Contractors will be contacted to schedule monitoring and provided with a checklist of monitoring components.

After compliance monitoring, contractors will be provided with a completed monitoring checklist and a list of required follow-up actions. Contractors must respond to the required follow-up actions within the specified time period. Failure to do so may result in reimbursements being delayed until the response is received.

Monitoring may be performed more frequently than annually if there are concerns about program performance or compliance.

In addition to the regular Compliance Monitoring, the County may also conduct a quarterly compliance review. A spot audit is a simple way that the County can verify that program requirements are being met and appropriate documentation is being obtained for the program and its clients. This information can help determine if the County can provide additional guidance, technical assistance, or ways to increase efficiency. Together we can ensure we are meeting our obligations under the funding requirements.

KEPA sub-contractors may also be monitored by the Department of Commerce in accordance with the T-RAP and ERAP Guidelines.

### 9.6 NON-DISCRIMINATION POLICY

Contractors must have a written non-discrimination policy, available for review during site monitoring visits. The policy should apply to all areas of employment and volunteer participation.

Contractors must comply with all federal, state, and local nondiscrimination laws, regulations, and policies.

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

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

Local nondiscrimination laws may include additional protected classes.

### 9.7 TENANT AND LANDLORD NOTIFICATIONS

Upon submittal of an application or pre-application, or by request, an Eviction Assistance Distribution Organization will provide a Letter of Application Submission which states that the household has applied

for rental assistance. This letter will be provided to the applicant directly or to the Outreach Partner Organization submitting the application to provide to their client.

For rental assistance applications, the Eviction Assistance Distribution Organization must notify the tenant and the landlord in writing when their application has final approval for payment. For utilities assistance, the Eviction Assistance Distribution Organization must notify the tenant and the utility provider in writing that the application has been approved and submitted for payment. Notifications should happen within 3 business days of the application being approved and submitted for payment. Notification may be through email, fax, US Mail, or in-person delivery.

## 9.8 INELIGIBLE USE OF FUNDS AND FRAUDULANT ACTIVITIES

The County is committed to the prevention of fraud and to the good stewardship of funds. All sub-contractors, employees, clients, landlords, and tenants are responsible for preventing, identifying, and reporting fraud. Reasonable attempts must be made to prevent the ineligible use of funds.

Fraud is a criminal act. Fraudulent activities may include, but are not limited to:

- Theft or embezzlement.
- Bribery or kickbacks.
- The intentional submission of false documentation.
- Forgery or alteration of documents.
- Destruction or concealment of records.

### Preventing Fraud

- All attempts will be made to communicate to employees, landlords, and tenants what may or may not constitute fraud under KEPA guidelines.
- Prior to payment, employees will have applications reviewed by another employee or manager for review.
- Employees will look out for “flags” of potential fraud, including inconsistent or incomplete information. Employees will confirm that the property referenced in the application exists. Subjective and potentially biased evidence shall not be used as a basis for flagging fraud (e.g., hunches, intuition).

### Reporting and Investigating Fraud

- If fraud is suspected, the employee must immediately notify their supervisor.
- The supervisor will verify ownership of the property. This may be done through referencing the County Assessor’s site and/or by contacting the tenant or landlord.
- If the suspected fraud is confirmed or the suspicion of fraud is not alleviated, the organization will send a letter attempting to recover the funds.
- If funds cannot be recovered, law enforcement and the Washington State Department of Commerce shall be notified.
- Any investigation of fraud or other criminal activity will not be disclosed except to the appropriate law enforcement authorities.
- T-RAP, ERA, and ERAP sub-contractors shall not retaliate against tenants or employees who report fraud, criminal activity, or other program irregularities.
- Landlords, tenants, and employees shall be accorded full due process of law.



To report suspected fraud committed by a sub-grantee, please contact the Grant Manager. Kitsap County staff, including the KEPA Grant Manager, the Housing and Homelessness Division Manager, and the Human Services Director or their designees, will conduct investigations into alleged fraud or ineligible uses of funds by sub-grantees. Kitsap County may request to inspect the books and records of sub-contractors per 17.7 of the contract terms and may review and monitor financial and services components of the program per 17.9 of the contract terms.

Should claims of fraudulent activity be substantiated, funds must be returned to the payor. The person and/or entity which committed the fraudulent activity may be subject to administrative, civil, and/or criminal penalties. Kitsap County will inform the Washington State Department of Commerce and/or law enforcement as appropriate.

### 9.9 REQUIRED POLICIES AND PROCEDURES

Pursuant to Commerce requirements, contractors must have the following written policies in place before approving KEPA applications for payment. These written policies may be requested by the Housing and Homelessness Division for review at any time.

**Grievance Procedure** – Contractors must have a written grievance procedure/complaint process for households seeking or receiving services. Each client must be made aware of the grievance procedure when they enroll in the program.

Grievance Policies must include:

- how the Agency provides information to their clients about how they can make a complaint about an Agency program, staff member, or operations;
- how a complaint or grievance can be submitted to the Agency;
- the various levels of leadership within the Agency that a complaint can be directed to (for example if the complaint is about a program manager, who can the complaint be given to?);
- what happens internally in the Agency when a complaint is received,
- how information about the response to the complaint is communicated to the client (if they identify themselves in the complaint);
- when and how the complaint is considered to be resolved; and
- how the Agency records and tracks complaints to identify any patterns of concern.

Kitsap County may request a copy of an Agency's Grievance Policy at any time.

**Termination and Denial of Service Policy** – This policy must describe the reasons a household would be denied services and/or terminated from program participation. It must also describe the notification process and ensure that households are made aware of the Grievance Procedure.

**Written Self-Declaration Policy** – This policy must specify under what circumstances the organization will accept written self-declarations from the household without further documentation to determine any aspect of eligibility or the amount of assistance, and in such cases, the organization must have in place reasonable validation or fraud prevention procedures to prevent abuse. *If the organization is not an Eviction Assistance Distribution Organization, this policy is not required.*

**Eligibility Policy** – Program eligibility will be determined based on the KEPA Pre-Application form and other documentation submitted by the tenant in accordance with T-RAP Guidelines and Treasury

Guidance. If an applicant is not eligible for the KEPA program, then they will be considered for eligibility for other rental assistance/eviction prevention programs if such programs are available through the Distribution Organization. Distribution Organizations must document any additional procedures and policies for determining a household's eligibility for eviction assistance and/or utilities assistance. *If the organization is not an Eviction Prevention Assistance Distribution Organization, this policy is not required.*

**Prioritization Policy** – Prioritization for receiving eviction assistance is outlined in this document under the Household Eligibility and Prioritization section. If any additional prioritization is added at the organizational level, the contractor must receive prior approval from Kitsap County and the contractor's policy must include how the organization determines the prioritization of households for services in compliance with the Commerce and Treasury guidance. *If the organization is not an Eviction Prevention Assistance Distribution Organization, this policy is not required.*

**Unsafe or Unhealthy Living Conditions** – This policy should address how the organization will determine the presence of unsafe or unhealth living conditions to verify housing status and what evidence of risk is acceptable in order to support the determination that a household satisfies this requirement. *If the organization is not an Eviction Prevention Assistance Distribution Organization, this policy is not required.*

**Other Housing Costs Policy** – If an organization is planning to provide eviction assistance in the form of "other housing costs," this policy must describe which costs may be covered and what criteria will be used to determine if the cost is appropriate and meets Commerce and Treasury guidance requirements, as outlined in the Commerce T-RAP Guidance. *If the organization is not an Eviction Prevention Assistance Distribution Organization, this policy is not required.*

**Internet Costs Policy** – This policy must include the circumstances in which the organization will determine that covering internet costs would be appropriate. *If the organization is not an Eviction Prevention Assistance Distribution Organization, this policy is not required.*

## 9.10 REPORTING REQUIREMENTS

Reporting for KEPA grants is as follows:

- 1) All KEPA contractors must provide a summary of activities and the number of households reached and number of households referred to KEPA for that period with each reimbursement request on the Summary Statement of Expenses.
- 2) For contractors distributing eviction prevention assistance and/or utilities assistance directly, a Commerce T-RAP Monthly Report Form with corresponding information for households served in the prior month must be submitted to [cderenbu@kitsap.gov](mailto:cderenbu@kitsap.gov) on or by the 5<sup>th</sup> of the month.
- 3) For contractors that are By & For and Outreach Partners which perform outreach & education and/or application assistance, a Kitsap County Outreach Partner Organization Monthly Report Form with corresponding information for households served in the prior month must be submitted with your reimbursement request on or by the 14<sup>th</sup> of the month.
- 4) At the conclusion of the grant period, all contractors will be required to submit a completed simple KEPA Grant Final Report Form.

## 9.11 RECORDS MAINTENANCE AND DESTRUCTION

Contractors must maintain records relating to each grant contract for a period of six years following the date of final payment.

### 9.12 TIMELEY EXPENDITURE OF FUNDS

Grant funds must be fully spent by the contract termination date. If the funds are not expended during the contract period, they will be forfeited.

### 9.13 COMMERCE REQUIREMENTS

Contractors must also abide by all Department of Commerce requirements for these funds, as outlined in Commerce’s T-RAP and ERAP Guidelines and corollary Q&A documentation. Such requirements will be provided to contractors by the Housing and Homelessness Division.

### 9.14 UPDATES TO KEPA GUIDELINES

Kitsap County may issue periodic updates to KEPA Guidelines, as T-RAP Guidelines, Treasury Guidance, availability of funding, or local policies or procedures change. KEPA contractors are responsible for following the most recent KEPA Guidelines, which will be available at:

<https://www.kitsapgov.com/hs/Pages/HH-Grant-Recipients-page.aspx>

## Section 10: Provision of Services Requirements

---

### 10.1 RELIGIOUS REQUIREMENTS PROHIBITED

Contractors are prohibited from making any program services, assistance, or housing conditional on clients participating in any sort of religious activity. No funding provided through Kitsap County may be used to support or engage in any explicitly religious activities, including activities that involve overt religious content such as worship, religious instruction, or proselytization.

### 10.2 COVID-19 RECOMMENDATIONS

Contractors must make every effort to comply with the most updated COVID-19 recommendations for providing services to people from the Center for Disease Control, the Washington State Department of Health, the Washington State Department of Commerce Housing Assistance Unit, and the Kitsap Public Health District.

## Section 11: Housing and Homelessness Division Complaint Policy and Procedure

---

The Kitsap County Housing and Homelessness Division (“the County”) regularly monitors contracts with agencies, including periodic site visits, typically resolving administrative contract issues.

### 11.1 COMPLAINTS TO THE COUNTY

Sometimes complaints are made directly to the County. Whether or not the County takes action in a given instance will be at the sole discretion of the County and the County has the right, but not the duty or obligation, to take action.

In general, complaints about agencies contracted with the Housing and Homelessness Division that are submitted to Kitsap County or forwarded from a provider will be sent to the Kitsap County Housing and Homelessness Division Manager (hereafter “County Manager”).

Upon receiving a complaint, the County Manager may attempt to get the complaint in writing if it is not already in that form.

The County Manager will forward the complaint or a summary of the complaint to the Agency for their information, redacting personally identifying information if the complainant does not wish to be known to the Agency.

The County Manager will record and track complaints to determine if multiple complaints about an Agency are forming a pattern of concern or if a complaint is of a nature to warrant further action. Further action may include requesting a response to the complaint from the Agency and/or initiating a Plan of Correction.

The County will determine when a Plan of Correction process should be undertaken with the Agency as follows:

#### **Developing Findings**

- a. The County Manager will notify the Agency in writing that there is concern about a pattern of complaints, send a brief summary of the complaints, and request a meeting regarding the complaints. The County Manager will request that the Agency designate an Agency representative who is not involved in the complaints to participate in this process.
- b. At the meeting, the County Manager will discuss the complaints with the Agency representative and gather any additional information about the situation.
- c. The County Manager will send a summary of findings to the Agency along with next steps.

#### **Plan of Corrections Process**

- d. If the Findings indicate a pattern of concern, then the Plan of Correction process will be initiated.
- e. The County Manager will send a list of Findings, a Plan of Correction template, and deadline for the Agency response to the Agency. If the findings involve the Agency Director, then the information will be sent to the Board Chair. The County Manager will be available to answer Agency questions during this process.
- f. The Agency will be required to submit a Plan of Correction to the County Manager for approval by the deadline provided.
- g. The County Manager has the authority to accept the Plan of Correction or send it back to the Agency for further work.
- h. Once a Plan of Correction has been approved by the County Manager, they will call a meeting of the Agency’s representative to review the Agency’s proposed Plan.
- i. Monitoring meetings will be held on a regular basis and will include the County Manager and the Agency representative(s) to review progress on the Plan. Coordination of these meetings, assessment of progress, and milestone completion will be the responsibility of the County Manager.
- j. When the County Manager determines that the appropriate milestones have been met and the Plan of Correction is complete, they will inform the Agency’s in writing.
- k. If the Agency fails to cooperate with the Plan of Correction process or fails to complete the Plan of Correction in a timely manner, the County will consider taking further action, such as withholding grant funding until the Plan is completed or invoking a contract termination.

